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APPENDIX A
SCOPING SUMMARY, SCOPING COMMENTS, KEY DOCUMENTS,
NOTICES, AND PUBLIC COMMENT DOCUMENTS

Appendix A-1

CPO Purpose and Need Factors

A-1 CPO Purpose and Need Factors

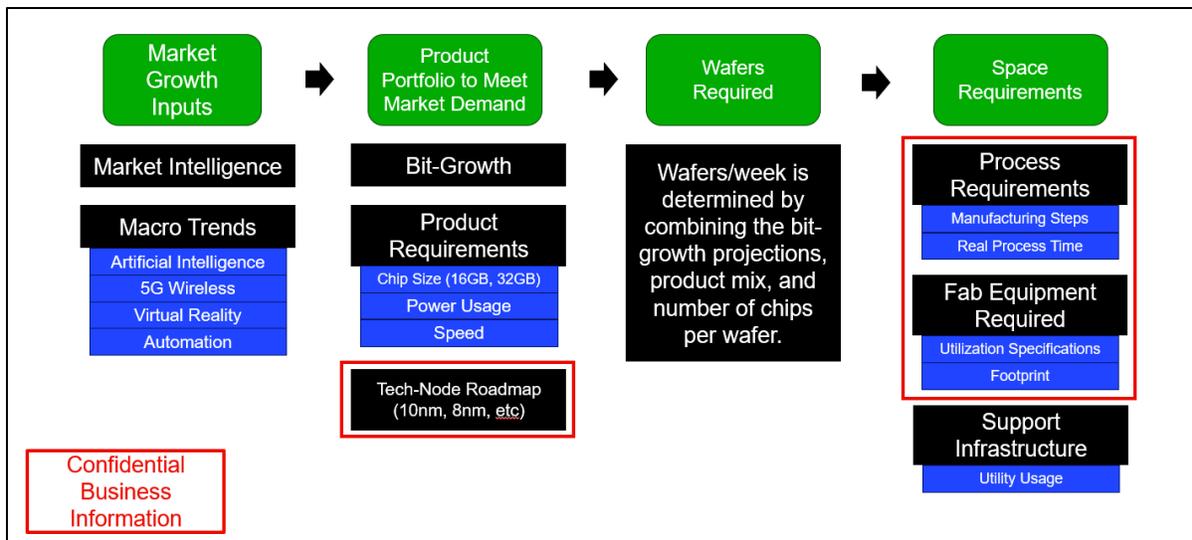
As described in Section 1.1.1, the Department of Commerce’s funding award for a semiconductor memory facility is based on two factors: (1) the amount of cleanroom space that would be required to achieve an economically viable domestic memory chip output sufficient to meet U.S. economic and national security objectives, based on economic modeling; and (2) by extension, the amount of total building area and site configuration that would be required to support that cleanroom space, accounting for technological, logistical, and cost considerations.

A-1.1 Cleanroom Space

Based on the economic modeling that Micron submitted in support of its CHIPS application, the Department of Commerce determined that Micron would need to construct 2.4 million sq. ft. of cleanroom space capable of producing an average of 52,000 wafers per week over the life of the project to achieve the level of domestic memory chip output sufficient to meet U.S. economic and national security objectives.

This output and associated cleanroom space requirement is based on Micron’s sources and uses information submitted in support of its CHIPS application, including economic modeling and estimates that Micron prepares as part of its annual long-range SNOP process. Micron uses its SNOP process to forecast overall memory sector market growth based on market intelligence, macro trends from new technologies such as AI, virtual reality, 5G wireless proliferation, and many other factors. Based on its product mixes and technological capabilities, such as the number of bits it can manufacture per wafer, Micron then determines how many wafers would be required to meet DRAM market demand, which in turn determines the cleanroom space required to meet that demand. Figure A-1 illustrates the SNOP process.

Figure A-1 Micron Long Range SNOP Process



Source: Micron Technology.

The economic modeling in Micron’s SNOP process analyzes key market trends. In the semiconductor industry, one key trend is the continuous effort to develop chips based on increasingly smaller (e.g., nanoscale) “technology nodes” enabled by advancements in semiconductor manufacturing technology.¹ As technology nodes become smaller typically every 18 to 24 months, more processing steps are required per wafer due to increased manufacturing complexity. This results in both longer processing times per wafer and the need for additional, highly complex, space-consuming, and expensive semiconductor manufacturing equipment or “tools,” which in turn require more cleanroom space.

Therefore, as reflected in historic data and information from the research and development processes of Micron and other manufacturers, as technology advances, the number of wafers that can be produced per square foot of cleanroom space declines, necessitating more cleanroom space. Micron’s modeling also considers that, as technology advances and technology nodes become smaller, the amount of data stored per wafer (measured in bits) increases, which further drives longer processing times per wafer, manufacturing complexity, the need for additional tools, and requirements for more cleanroom space.

Micron’s ability to achieve a target DRAM wafer output and successfully align its investment planning and product optimization with that output thus depends on the ability to effectively model and forecast memory chip demand based on the above technical considerations. The economic and commercial viability of Micron’s planned facilities depends in part on Micron’s ability to analyze how trends in declining wafer production per square foot of cleanroom space and increasing data storage per wafer affect overall operational capacity and efficiency, so that Micron can align its production capacity with future market growth and competition.

Micron gathers market intelligence from a variety of sources, including industry publications and engagement with customers. The Boston Consulting Group (BCG) and the Semiconductor Industry Association (SIA) estimate that the United States accounts for 25 percent of global memory chip demand, and that 9 percent of the global memory chip output is consumed by applications that are critical to U.S. economic and national security (Varas et al., 2021), including defense, aerospace, telecommunications, energy, medical equipment, and other applications. As noted in Section 1.1.1, because Micron currently manufactures all DRAM produced in the United States, but that output is less than one percent of global DRAM production, the United States memory chip supply chain is largely dependent on production in East Asia, which leaves the United States exposed to geopolitical tensions and large-scale supply interruptions, which could impair access to suppliers or customers.

To expand domestic DRAM production, Micron has first looked to expansion and modernization of their existing domestic facilities. The expansion at the Virginia site is focused on the automotive, aerospace, defense and industrial markets, and does not offset any of the DRAM and HBM chips planned to be manufactured in New York. The ongoing expansion at Micron’s HQ and R&D facility in Idaho to include high volume DRAM production will satisfy the short-term domestic needs for DRAM chips but will be inadequate to satisfy projected growth leaving

¹ A technology node is the smallest manufacturable feature size on a chip, typically measured by transistor gate length, often in nanometers (nm). As the technology node size shrinks, more transistors can be packed into a given area, improving performance.

the United States again dependent on production in East Asia over the next decade. The expansion of HVM in Idaho is also possible due to colocation benefits with R&D.

The 2.4 million sq. ft. of additional cleanroom space that would be needed to achieve the level of domestic memory chip output sufficient to meet U.S. economic and national security objectives described above is based on historical investment data showing that DRAM memory chip manufacturing requires, on average, approximately 2.05 times the capital intensity of logic chip manufacturing (Yoon, 2021), which drives memory cleanroom size. In general, an economically viable logic operation requires approximately 300,000 sq. ft. of cleanroom space, and the typical memory operation requires approximately 600,000 sq. ft. of cleanroom space. Based on these factors and technical constraints relating to bit-growth per wafer and step-growth per wafer from new technology nodes, achieving the necessary level of DRAM output requires a total of 2.4 million sq. ft. of cleanroom space.

In addition, growth trends in logic fabs also drive growth trends in memory fabs. In their 2021 report, “Strengthening the Global Semiconductor Value Chain,” BCG and SIA specifically noted that “covering the expected domestic consumption of advanced logic chips for critical infrastructure applications by 2030 would require building . . . 2-3 new state-of-the-art [logic] fabs in the U.S.” (Varas et al., 2021). The Department of Commerce factored in this domestic need for logic chip production in the context of a separate CPO award to TSMC Arizona Corporation to construct three leading-edge logic fabs in Arizona with 900,000 sq. ft. of cleanroom space.² Because on-shoring of logic chip production is anticipated to drive domestic growth of products requiring logic chips that also will require memory chips,³ 2.4 million sq. ft. of cleanroom space is in keeping with the projected capital intensity needed to on-shore memory chip production at pace with logic chip production.

A-1.2 Co-Location at Sufficient Scale

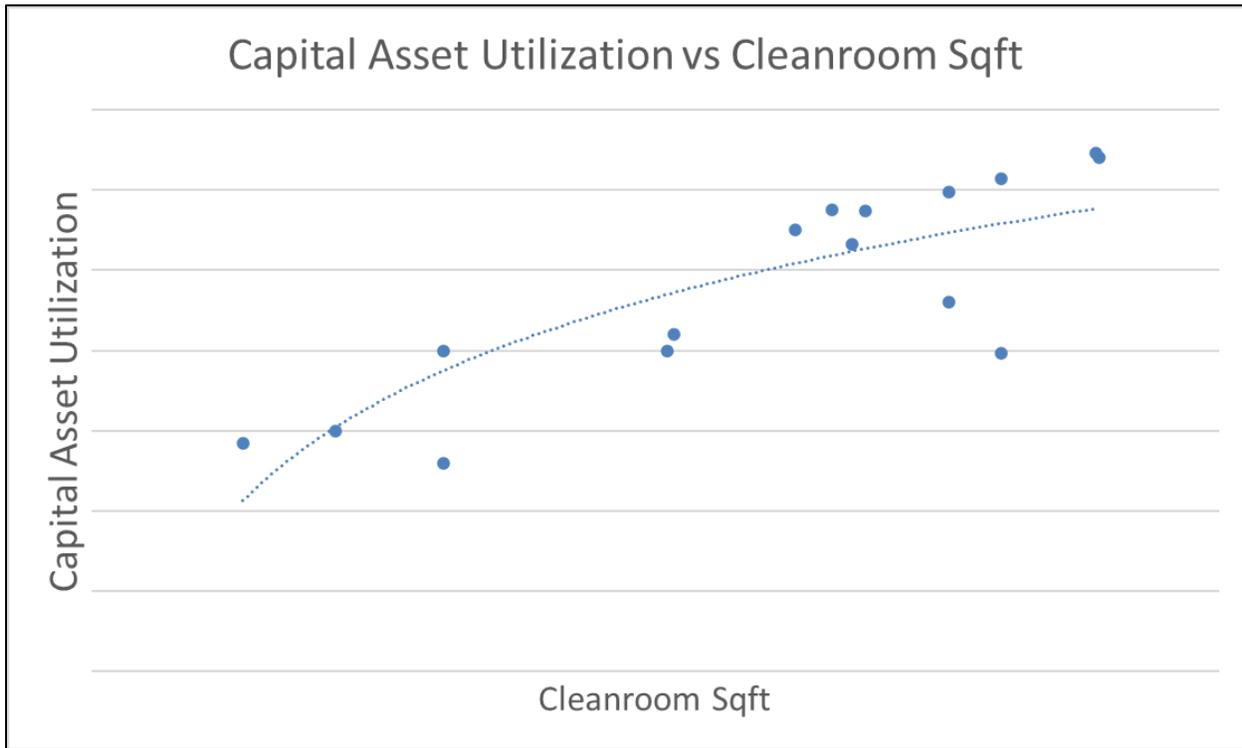
As noted above, cleanroom space is the primary driver of semiconductor facility size requirements. However, a key related requirement is the need to accommodate such large amounts of cleanroom space with sufficient supporting infrastructure and utilities, accounting for technological, logistical, and cost considerations. As noted in Section 1.1.1, to be economically viable, large-scale semiconductor facilities need to be simultaneously: (a) large enough to achieve a utilization rate of their expensive facility infrastructure capable of justifying their capital expenditures, known as the CAU rate; and (b) compact enough with buildings efficiently designed to meet precise sizing, engineering, and interoperability specifications while minimizing overall building, utility, and equipment costs.

² See U.S. Department of Commerce, “Biden-Harris Administration Announces CHIPS Incentives Award with TSMC Arizona to Secure U.S. Leadership in Advanced Semiconductor Technology” (Nov. 15, 2024), <https://www.commerce.gov/news/press-releases/2024/11/biden-harris-administration-announces-chips-incentives-award-tsmc>; See also Arizona Commerce Authority, “President Trump, TSMC Announce \$100 Billion Investment in Arizona” (Mar. 3, 2025), <https://www.azcommerce.com/news-events/news/2025/3/president-trump-tsmc-announce-100-billion-investment-in-arizona/>

³ Logic chips are primarily designed to perform complex logical operations and execute instructions for programmable devices that rely on them; memory chips are primarily responsible for storing and retrieving data for such devices.

Although it would not cost more money, narrowly construed, to build only two or three fabs as opposed to four, a campus limited to two or three fabs would have a higher *per wafer cost* due to lower scale and production efficiencies. The incremental wafer cost would be higher at a 2-fab facility than a 4-fab facility. Put differently, to avoid a higher per wafer cost, semiconductor facilities must take advantage of larger economies of scale. The CAU rate is one measurement of this requirement and reflects the utilization rate of advanced semiconductor manufacturing equipment, weighted by cost. (For example, the average privately owned car is used only at certain times, to drive to work, the store, etc., whereas a taxi, which operates more continuously, has a much higher utilization rate.) In semiconductor manufacturing, the CAU rate increases with cleanroom square footage, as larger fabs enable more efficient equipment use (see Figure A-2).

Figure A-2 Capital Asset Utilization vs. Cleanroom Square Footage



Source: Micron Technology.

Micron estimates that with only two fabs instead of four, its CAU rate would be approximately 6.7 percent lower. This lower utilization rate would reflect the less efficient use of resources from operating fewer fabs with the same expensive equipment, which would result in a higher production cost per wafer. Specifically, Micron estimates that an additional up-front investment of approximately \$3.3 billion would be necessary to achieve the same output needed to meet the Department of Commerce’s goals with fewer fabs, due to the less efficient economies

of scale and lower CAU rate that approach would create.⁴

Building a large campus with four fabs would require co-locating the fabs in a precise site configuration to ensure adequate cost controls for economic viability. Memory is a commodity that is built to precise standards (such as the Joint Electron Device Engineering Council (JEDEC) standards) and is designed to be pin-compatible, enabling customers to easily substitute one supplier's product for another. This high level of interchangeability creates a highly competitive market. When combined with the cyclical nature of the semiconductor industry, which includes periods of operating at a loss, this combination reinforces the principle that controlling cost is paramount. Strict cost control is therefore essential for long-term viability. Co-locating cleanroom space in multiple fabs on a single site to reduce both the fixed cost per wafer produced and the average operating cost per wafer has become a demonstrated cost control strategy in the industry. In the context of the Proposed Project, and as shown in Table A-1 below, co-locating four fabs on a single site is necessary to avoid cost impacts that could prevent the campus from achieving economic viability.

⁴ This calculation is not applicable to the Virginia or Idaho expansions. The Virginia expansions is occurring within an already built clean room space that is underutilized. The Idaho facility is collocated with Micron's existing HQ and R&D facility and can share existing assets, making the expansion costs more favorable than the cost identified in Table A-1.

Table A-1 Cost Impacts of Building Fewer Than Four Fabs

Requirement	Description	Est. Cost Impact
Electrical Infrastructure	Each fab would use approximately 400 MW of electricity, which would require very large copper cables from the Clay Substation to the fabs. This cost is projected to remain high as the world electrifies transportation and builds out renewable energy solutions. By locating all four fabs at the WPCP across the road from the Clay Substation, Micron would be able to control these high transmission costs.	\$50 million (approx. \$5,000 per linear foot)
Lighting Strike Protection	One of the most damaging events to a semiconductor operation is the loss of power, even a short loss measured in seconds. ⁵ The Clay Substation has invested \$150 million to install lightning protection over the past five years. If Micron built some of the fabs elsewhere, Micron would need to invest \$150 million to ensure adequate lightning protection.	\$150 million
Water	By locating all four fabs at the WPCP, and with installation of the proposed OCWA water supply system upgrades discussed in this EIS, Micron would be able to ensure an adequate water supply for Fabs 1 and 2 using as much existing infrastructure as possible.	Estimate not available
Capital Equipment	As described above, Micron estimates that achieving the required memory chip output with a lower CAU rate from operating fewer fabs with the same expensive semiconductor manufacturing equipment would require \$3.3 billion in additional capital investment.	\$3.3 billion
Transportation	The WPCP is conveniently located near a major highway and is a short drive (20 minutes) from Syracuse. In comparison, STAMP is two times farther from I-90 and twice as far from a major metro area (Buffalo).	Estimate not available
Total Estimated Impact: \$3.5 billion (approx.)		

Source: Micron Technology

⁵ In 2019, a major semiconductor manufacturer in Japan experienced a 13-minute power outage due to a lightning strike on its electrical infrastructure. The outage impacted approximately 25 percent of the company’s output for the quarter, a material event financially for the company resulting in an estimated loss of \$250 million.

References

- Varas, A., Varadarajan, R., Goodrich, J., & Yinug, F. (2021). *Strengthening the global semiconductor value chain*. Boston Consulting Group & Semiconductor Industry Association. <https://web-assets.bcg.com/9d/64/367c63094411b6e9e1407bec0dcc/bcgxsia-strengthening-the-global-semiconductor-value-chain-april-2021.pdf>
- Yoon, J. K. (2021). *Foundry to account for 35% of chip spending in 2021*. The Elec. <https://thelec.net/news/articleView.html?idxno=3684>.

Appendix A-2
Final SEQRA Scope

MICRON SEMICONDUCTOR FABRICATION
CLAY, NY

FINAL SEQRA SCOPE OF WORK

December 14, 2023

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ABBREVIATIONS

ADA	Americans with Disabilities Act
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CLCPA	Climate Leadership and Community Protection Act
DEIS	Draft Environmental Impact Statement
EIS	Environmental Impact Statement
FHWA	Federal Highway Administration
GEIS	Generic Environmental Impact Statement
GHG	Greenhouse Gas
LWRP	Local Waterfront Revitalization Program
MSAT	Mobile Source Air Toxic
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NOI	Notice of Intent
NYSDEC	New York State Department of Environmental Conservation
NYSDOT	New York State Department of Transportation
OCDOT	Onondaga County Department of Transportation
OCDWEP	Onondaga County Department of Water Environment Protection
OCIDA	Onondaga County Industrial Development Agency
OCWA	Onondaga County Water Authority
OPRHP	New York State Office of Parks, Recreation and Historic Preservation
SEORA	New York State Environmental Quality Review Act
SGEIS	Supplemental Generic Environmental Impact Statement
SHPO	State Historic Preservation Office
SMTC	Syracuse Metropolitan Transportation Council
SPDES	State Pollutant Discharge Elimination System
SWPPP	Stormwater Pollution Prevention Plan
TEM	NYSDOT's The Environment Manual
USACE	United States Army Corps of Engineers
U.S.C.	United States Code
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
WPCP	White Pine Commerce Park
WWTP	Wastewater Treatment Plant

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1 Introduction

Micron New York Semiconductor Manufacturing LLC (Micron), a Delaware limited liability company (LLC) and wholly owned subsidiary of Micron Technology, Inc., is proposing to construct a semiconductor manufacturing campus (the “Micron Campus”) in the Town of Clay, New York, at the White Pine Commerce Park (WPCP), an approximately 1,400-acre industrial park controlled by the Onondaga County Industrial Development Agency (OCIDA). The Micron Campus, together with ancillary development on nearby properties (described below), are referred to collectively as the “Proposed Project.”

After receipt of an Application for Financial Assistance from Micron, OCIDA circulated a notice of intent to serve as State Environmental Quality Review Act (SEQRA) (6 NYCRR Part 617) (New York Environmental Conservation Law §§8-0101 et seq.) Lead Agency on July 28, 2023. No objections to that notice were received during the 30-day period commencing on that date. At its regular meeting of September 14, 2023, OCIDA issued a Positive Declaration, indicating the need for an Environmental Impact Statement (EIS), and scheduled a public scoping meeting held on October 11, 2023.

Micron, as the Project Sponsor, will prepare a draft Environmental Impact Statement (DEIS) pursuant to SEQRA. Since Micron is seeking federal funding under the “Creating Helpful Incentives to Produce Semiconductors and Science Act of 2022 (the “CHIPS Act”) and the Proposed Project will require certain federal permits and approvals that require federal environmental review, including, but not limited to, federal wetlands permits pursuant to Section 404 of the Clean Water Act, the SEQRA DEIS will also contain information to support the National Environmental Policy Act (NEPA) of 1969 (42 United States Code (U.S.C.) § 4321 et seq.) review.

This document is the Final SEQRA Scope for the proposed DEIS. It was prepared pursuant to 6 NYCRR Part 617.8 and provides: (1) a brief description of the Proposed Project; (2) an identification of potentially significant adverse impacts from the SEQRA Environmental Assessment Form and through consultation with Federal, State, and local agencies; (3) the extent and quality of information needed to adequately address each impact; (4) an initial identification of mitigation measures; and (5) the reasonable alternatives to be considered.

1.1 PROPOSED PROJECT OVERVIEW AND DESCRIPTION

Micron is a world leader in innovative memory solutions that transform how the world uses information. For over 40 years, the company has been instrumental to the world's most significant technology advancements, delivering optimal memory and storage systems for a broad range of applications. Memory is at the leading edge of semiconductor manufacturing and fuels everything from feature-rich 5G smartphones to the AI-enabled cloud. Micron's leadership in both

DRAM and NAND technologies provides the market-based confidence to invest up to \$100 billion to affirm the company's industry-leading memory innovation and deliver differentiated products to its customers.

Micron's proposed semiconductor manufacturing facility campus ("Micron Campus") in the Town of Clay, Onondaga County, New York will be built-out over an approximate 20-year period, and will consist of the construction of four (4) Memory Fabrication facilities (Fabs). Micron expects that the Fabs will be built in sequence, with construction of each Fab starting as the preceding Fab is being fit-out with manufacturing equipment and operations begun (the DEIS will analyze two interim analysis years as well as a final year of completion). This process will result in continuous construction activities on the site over the approximate 20-year period, with a significant portion of that construction occurring inside previously-constructed Fab buildings. Micron intends to start construction of the Micron Campus in 2024 with Fabs 1 and 2 operational by 2032. Fabs 3 and 4 would be operational by 2041.

1.1.1 Proposed Project Location

The proposed Micron Campus is an approximately 1,400-acre assemblage of land located at the White Pine Commerce Park (WPCP) in the Town of Clay bordered by NYS Route 31 to the south, Caughdenoy Road to the west, a series of National Grid overhead power lines to the north (although the Micron Campus extends approximately 100 feet beyond the power lines), and the Town of Clay/Town of Cicero boundary line to the east. Most of the Micron Campus is contained within the Town of Clay, Onondaga County, New York and is accessible from I-81 via an interchange with NYS Route 31. Figure 1 identifies the broader vicinity within which the Micron Campus would be located. Figure 2 identifies the Micron Campus in relation to surrounding roadways.

1.1.2 Project Background

OCIDA completed a Generic Environmental Impact Statement (GEIS) in 2013 and a Supplemental GEIS (SGEIS) in 2021 on potential development of WPCP with manufacturing use. See Section 3.2 for additional information on the project background and OCIDA's efforts to prepare a shovel-ready site for manufacturing use, with a particular focus on the semiconductor industry.

FIGURE 1 VICINITY MAP

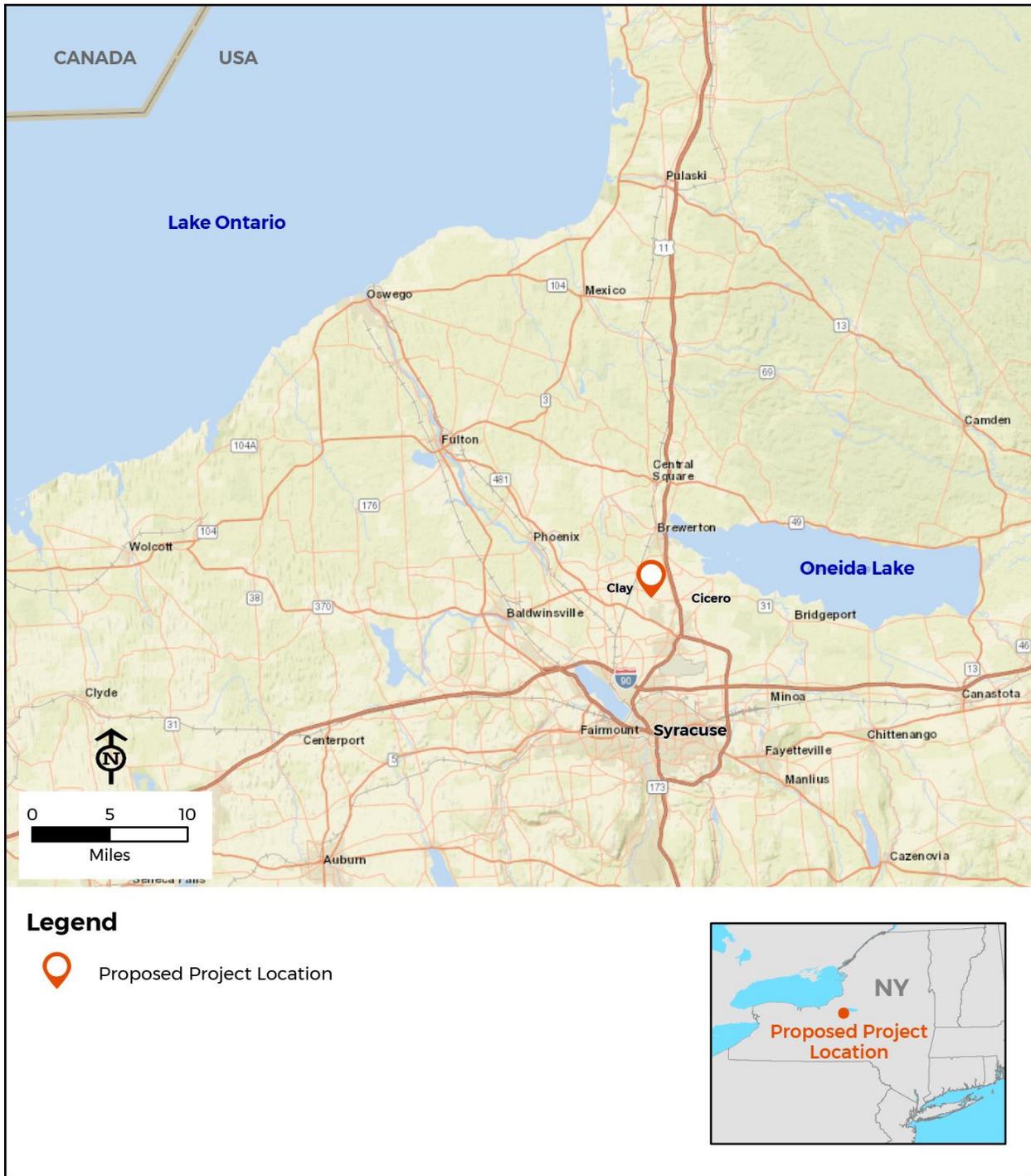


FIGURE 2 LOCATION OF PROPOSED PROJECT



1.1.3 Project Description

1.1.3.1 Micron Campus

The Micron Campus would comprise approximately 1,400 acres, consisting of the enlarged WPCP parcel studied in the 2021 SGEIS along with additional contiguous acreage acquired or to be acquired by OCIDA or Micron. Each Fab is expected to cover approximately 1.2 million sf of land and contain approximately 600,000 sf of cleanroom space¹, 290,000 sf of cleanroom support space², and 250,000 sf of administrative space. Each set of two Fabs will be supported by approximately 470,000 sf of central utility buildings³, 200,000 sf of warehouse space, and 200,000 sf of product testing space⁴ housed in separate buildings. The Micron Campus will also have ancillary on-site electrical substations, as well as facilities for water and wastewater treatment and storage, along with industrial gas storage. See Figure 3 for a preliminary site plan of the proposed Micron Campus.

Two (2) additional properties will be developed with uses ancillary to the Micron Campus (see Figure 4):

- An approximately 30.2-acre parcel on the north side of Caughdenoy Road (Town of Clay tax parcel 042.-01-13.0, 9100 Caughdenoy Road) (the "Childcare Site") on which Micron will construct an employee health care center and childcare center; and
- An approximately 1-acre parcel on the northwest side of the WPCP (048.-01-02.1) ("jack and bore site") which will be used for utility line conveyance.

The Micron Campus, with four (4) Fabs and all ancillary support facilities, driveways, and parking; the jack and bore site; and the Childcare Site comprise the "Proposed Project." The DEIS will include additional description of each element of the Proposed Project as well as a high-level description of key Micron systems to provide an understanding of Micron's proposed use and management of water, chemicals, and energy serving the site (including provisions for renewable energy sources). The DEIS will also describe Micron's generation and management of various waste streams and how best management practices will be implemented to limit energy consumption, water consumption, air pollutants, and generation of waste.

¹ Cleanroom: This part of the campus is where the thousands of advanced pieces of equipment are housed that are used to take raw silicon wafers and build the chips. It is called a cleanroom because there are strict requirements on particles in the air that can impact the functionality of the chips. The chips are built up in layers of metals and insulators, similar to how a building is constructed floor-by-floor.

² Cleanroom support: This part of the campus includes functions such as workshops to refurbish parts, labs to complete incoming chemical tests, surface analysis of what is on the wafers, and analysis of cross-sections of the wafer to validate the structure of the chips meets requirements.

³ Central utility building: These buildings house the systems required for delivering the utilities necessary to produce the chips. These utilities include systems such as HVAC, electrical transmission equipment, water purification and recycling, and chemical/specialty gas delivery systems.

⁴ Product testing space: This space is used to house advanced equipment that takes finished wafers and performs electrical testing that validates the chips function to required specifications before the wafers are shipped out for assembly into products and further testing.

FIGURE 3 PROPOSED SITE PLAN FOR MICRON CAMPUS



1.1.3.2 Off-Site Improvements

Off-site energy (natural gas and electricity), telecommunications, water, wastewater utility, and rail spur improvements also will be required and will be identified as "off-site improvements" necessary for the Proposed Project (see Figure 4). The DEIS will assess impacts of the Proposed Project and off-site improvements. National Grid will complete a separate Article 7 regulatory process before the New York Public Service Commission with regard to the electric transmission lines needed for the Proposed Project. The following off-site improvements have been identified:

Energy

- Extension of a 16-inch diameter natural gas line from National Grid's Gas Regulator Station (GRS) 147 at 4459 NYS Route 31 to the Micron Campus (approximately 3.15 miles) and construction of GRS 147A at the same address as the existing GRS;
- Construction of eight (two per Fab) underground electrical transmission duct bank connections from the existing National Grid sub-station west of Caughdenoy Road.

Telecommunications

- Extension of existing fiber-optic lines located along NYS Route 31 to the Micron Campus and from the existing fiber-optic lines located along Caughdenoy Road.

Water Supply

Onondaga County Water Authority (OCWA) has capacity within its water supply system to service Micron's initial water demand for construction and operations of Fab 1 (approximately 11.5 million gallons per day (MGD)). A new Clear Water Pumping Station at OCWA's Lake Ontario Water Treatment Plant (LOWTP) would be required. This new Clear Water Pumping Station will be designed to accommodate anticipated water demand for Micron's Fab 2, Fab 3, and Fab 4. Potable water for initial construction would be provided to the Micron Campus through existing buried water mains located within the Caughdenoy Road and Burnet Road rights-of-way. Potable water for Fab 1 operations would be provided to the Micron Campus through construction of a new connection from OCWA's existing Eastern Branch Transmission Main south of NYS Route 31 via a new service connection within a 99-foot-wide easement within the Micron Campus along Caughdenoy Road.

To serve the anticipated future demand of approximately 48 MGD, OCWA would have to make the following water supply infrastructure improvements:

- Construction of a new Raw Water Tunnel and Raw Water Pumping Station at OCWA's existing Burt Point property on Lake Ontario (City of Oswego);
- Construction of a new Raw Water Transmission Main from Burt Point to OCWA's Lake Ontario Water Treatment Plant (LOWTP) using an easement that OCWA obtained for such purposes in the 1990s;

- Modification to the LOWTP with addition of two (2) new filters, one (1) contact basin, and one (1) new clearwell as well as additional chemical storage space and residual handling facilities;
- Expansion of OCWA's Clear Water Transmission Main from LOWTP to OCWA's Terminal Campus with one (1) additional 54-inch diameter line parallel to the existing 54-inch diameter line;
- Construction of one (1) 15 million gallon water storage tank at OCWA's Terminal Campus;
- Upgrading of existing pumps at OCWA's Farrell Pumping Station at Terminal Campus and construction of a parallel pumping station;
- Expansion of OCWA's Eastern Branch Transmission Main south of NYS Route 31 from one (1) 54-inch diameter water main with up to three (3) additional 54-inch diameter water mains depending on evaluations of Micron's initial water re-use and reclamation performance; and
- Relocation of a portion of the existing OCWA Eastern Branch Transmission Line crossing the Micron Campus to allow for Micron Fab 3 and Fab 4 construction.

Wastewater

Onondaga County Department of Water Environment Protection (OCDWEP) will be able to convey sanitary wastewater from the Micron Campus during initial construction through a previously planned and separately studied extension of municipal sanitary wastewater force mains to a portion of the Oak Orchard Wastewater Treatment Plant (WWTP) service area that has not previously been served by municipal infrastructure. Operation of Micron's Fabs 1-4 will require additional industrial wastewater infrastructure and improvements to the Oak Orchard WWTP in addition to planned industrial wastewater pre-treatment facilities that Micron will construct on the Micron Campus. The following OCDWEP infrastructure improvements are required prior to operation of Micron's Fab 1:

- Construction of OCDWEP industrial wastewater service conveyance to the Oak Orchard wastewater treatment plant (WWTP) from a new industrial wastewater pumping station to be constructed on the Micron Campus. Conveyance infrastructure would comprise four (4) 30-inch force mains for industrial wastewater; and one (1) 36-inch force main for reclaimed water supply; and
- Expansion of the Oak Orchard WWTP to treat industrial wastewater (with pre-treatment required by Micron at the Micron Campus).

Rail Spur Site

Micron has proposed to construct a rail spur on an approximately 37-acre area on the west side of Caughdenoy Road (including Town of Clay tax parcel 046.-02-03.2) (the "rail spur site"). The rail spur will be used to deliver construction aggregate to the Micron Campus to reduce construction vehicle impacts on the local community from construction of the Proposed Project, which will

facilitate the avoidance, minimization and mitigation of traffic, air, climate change and community character impacts. The rail spur is a separate but related action that would require advanced construction to achieve the intended benefit of reduced construction vehicle impacts from the Proposed Project. Although it will be addressed separately under SEQRA so that it is in place at the commencement of groundbreaking in order to maximize mitigation measures for the Proposed Project, it will also be analyzed in the SEQRA DEIS.

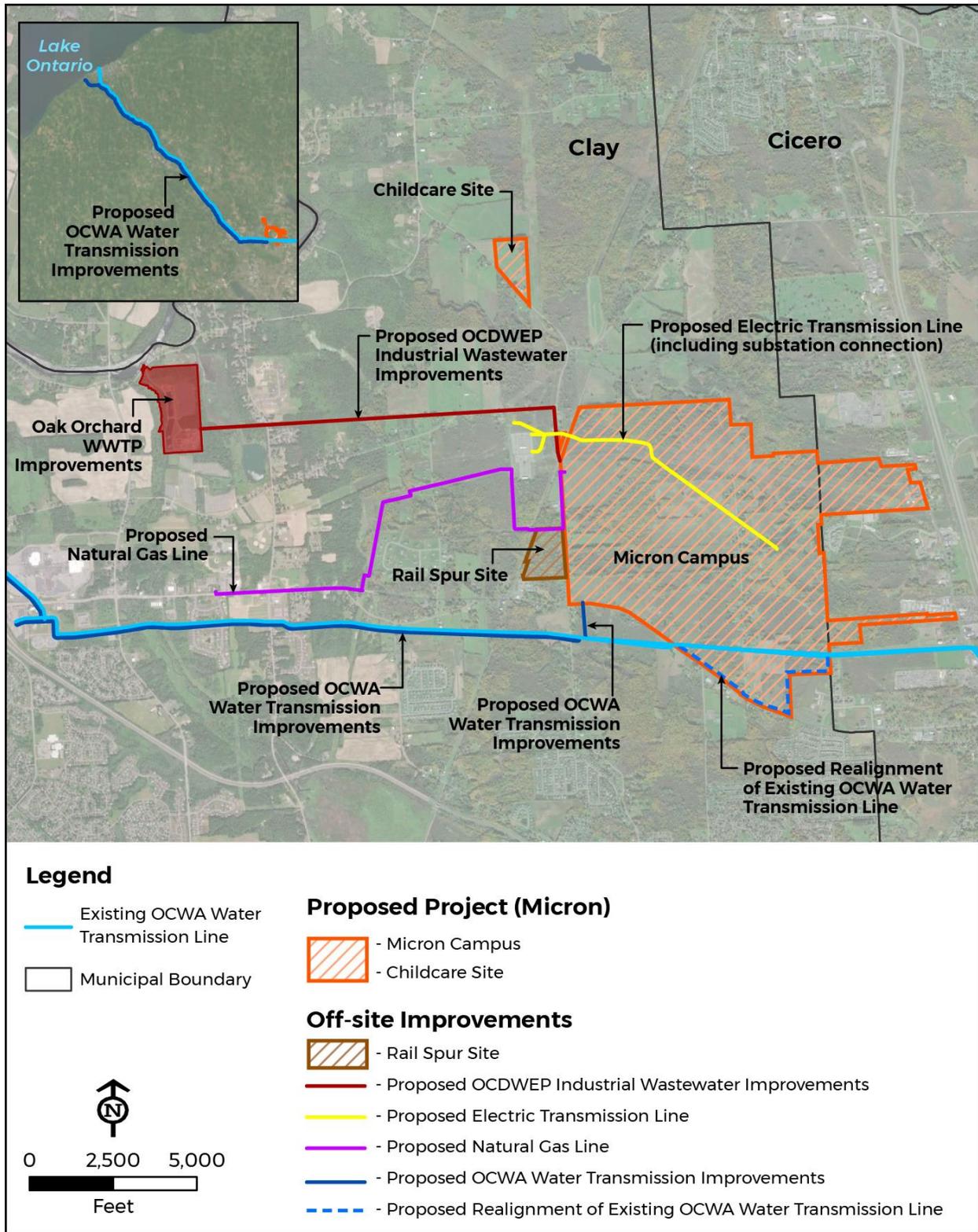
1.1.3.3 Proposed Project Employment

Micron will create approximately 9,000 high-paying jobs by 2045 to support the Micron Campus when operating at full capacity and about 40,000 community jobs over a 20-plus year period to include suppliers, contractors, and other supporting roles. Micron has begun efforts to attract a diverse and multi-talented workforce to Central New York. Using its existing labor models for high-volume fabs around the globe, Micron has estimated that 90% of its workers will be dedicated to manufacturing, and the remaining 10% will provide support services, including IT, security, quality, procurement, supply chain, smart manufacturing technology, finance, people, and legal services.

The bulk of manufacturing headcount will comprise three major job categories, each with a mix of specific jobs and skillsets. In the category of leadership (~10%), there are directors, managers, and supervisors. Typical qualifications for managers are a B.A. or B.S. degree or equivalent training and experience and five years of leadership experience. For supervisors, these are an A.A. or A.S. degree or Production Operations Management Certificate or equivalent training and experience. For directors, a B.A. or B.S. degree or equivalent training and experience, and eight years of leadership experience is required. In the category of Engineering & Professional (~44%), the bulk of needed roles are equipment engineers and process engineers. Engineering roles require a B.S. in Engineering or a B.S. in a relevant discipline, and Micron provides specific on-the-job training for the role's function. In the category of Technicians (~36%), the bulk of needed roles are equipment technicians and process technicians. Technician roles require the same minimum qualifications, and Micron provides specific on-the-job training for the role's function. The qualifications are an A.A or A.S. degree or completion of a Micron Apprenticeship Program or, other approved certification, or a combination of certifications under development with Micron community college partners or equivalent training and experience.

Micron will operate three (3) shifts over a 24-hour day. Day and night shifts will be utilized to sustain 24-hour manufacturing activities as well as a maintenance shift.

FIGURE 4 PROPOSED PROJECT AND OFF-SITE IMPROVEMENTS



2 The Scoping Process and Agency Coordination

Scoping provides an opportunity for the public to learn more about the Proposed Project and to provide valuable input as Micron and OCIDA prepare the SEQRA Draft EIS (DEIS). A SEQRA Positive Declaration and notice of public scoping meeting was published in the *Environmental Notice Bulletin* on September 20, 2023. Notice of the public scoping meeting was placed in The Post Standard (Syracuse.com) – a newspaper of general circulation serving the broader Clay, New York area on September 19, 2023.

Project information and this final SEQRA Scope was also posted on OCIDA's website (www.ongovd.com).

OCIDA, as SEQRA Lead Agency, invited the public and agencies to be involved in the environmental review process. During the SEQRA scoping process, comments were encouraged on the draft purpose and need, potential alternatives, and environmental issues of concern. A list of the Federal, State, and local agencies with which OCIDA is coordinating is provided in Section 6.

Public Comment Period and Community Meetings

- The comment period for the scoping process was extended beyond the minimum required 30 days from September 20, 2023, to October 31, 2023. During this period, OCIDA held a public scoping meeting on October 11, 2023, at 6:30 PM to obtain input from the public. Everyone who registered or asked to speak was given the opportunity to submit a verbal comment.

The scoping meeting provided simultaneous Spanish and American Sign Language interpretation. No additional language translation services or special needs assistance were requested.

How Comments Were Received

Comments were accepted during the scoping period via:

- Public comment at the public scoping meeting on October 11, 2023;
- E-mails to micron@ongov.net; and
- Mail to Attn: Micron Project, Office of Economic Development, Onondaga County, 335 Montgomery Street, 2nd Floor, Syracuse, NY 13202

All comments received, no matter their format, were considered equally. In total, 39 individuals, organizations, or agencies provided comments during the public comment period including written comment letters from the United States Fish & Wildlife Service and the New York State Department of Environmental Conservation.

How Comments Were Used

After the end of the comment period on October 31, 2023, OCIDA, with assistance as needed from Micron, collected, reviewed, and summarized the comments received and prepared this final SEQRA Scope with attached Response to Comments found in Appendix B. The comments received during the scoping period were considered by OCIDA to define this final scope of the DEIS and to inform the related technical analyses and environmental resources to be evaluated.

OCIDA has made the final SEQRA Scope available to all interested and involved agencies as well as on its website (www.ongovcd.com/ocida) and to everyone that commented during the public comment period. This final SEQRA Scope will be used to prepare the DEIS.

3 Purpose and Need

3.1 PURPOSE AND NEED

The purpose of the Proposed Project is to further the United States goal to expand domestic memory chip manufacturing capacity and restore U.S. leadership in semiconductor manufacturing as embodied in the "Creating Helpful Incentives to Produce Semiconductors and Science Act of 2022" (the "CHIPS Act"). For Micron, the purpose is to advance its leading-edge position in the development and manufacturing of DRAM memory chips.

The purpose of the CHIPS Act and the need for the Proposed Project is to reduce U.S. reliance on foreign production of both leading edge and older generation microelectronics. Semiconductors were invented in America, and the U.S. semiconductor industry has historically dominated many parts of the international semiconductor supply chain, such as R&D, chip design and manufacturing. Yet the U.S. position within the semiconductor industry has been declining. According to the Semiconductor Industry Association, U.S. production of the world's microchips has fallen from 37% in 1990 to 12% in 2020. The need for the Proposed Project is to reduce economic and national security risks by building domestic capacity, to establish a dynamic and collaborative network for semiconductor research and innovation centers, and to improve competitiveness and strengthen regional supply chain industries. Micron provides a unique and essential role in domestic production of leading-edge memory chips that are essential and high-volume components of the semiconductor industry.

Micron's investment in the Proposed Project will also advance the goals of the State of New York and OCIDA to enhance job growth in Central New York by promoting advanced manufacturing in the region. The Proposed Project is anticipated to generate nearly 50,000 jobs in Central New York over more than a 20-year period, including 9,000 good-paying Micron jobs directly generated by the Proposed Project and over 40,000 additional jobs with suppliers, contractors and other businesses supporting the proposed chip manufacturing facility. To this end, Micron and the State of New York have announced a historic \$500 million investment in community and workforce development over a more than 20-year period. Micron will further invest \$250 million in line with its commitment to the Green CHIPS Community Investment Fund. An additional \$250 million is expected to be invested, with \$100 million from New York, and \$150 million from local, other state and national partners. This fund is intended to expand and train the workforce in the region, including providing support for disadvantaged populations.

3.2 PROJECT BACKGROUND

Central New York as well as other regions of New York State have experienced a reduction in manufacturing jobs over several decades. In 1991, OCIDA and the City of Syracuse Chamber of

Commerce commissioned an Industrial Park Feasibility Study to identify potential candidate sites for locating industrial businesses in Onondaga County (the "County"). The study identified two sites for large scale industrial uses, with the White Pine Commerce Park (WPCP) ultimately selected as the preferred site for purchase due to its proximity to National Grid's Clay electric substation, highway access, and Industrial zoning designation. Between 1991 and 1999, the County purchased seven properties to form the original approximately 340-acre WPCP (previously referred to as Clay Business Park).

OCIDA's intent in acquiring the lands, was further justified in 1998 with the advent of the SEMI-NY program (as discussed below), resulted in the accumulation of the original 340-acre footprint of the WPCP. The SEMI-NY program was a New York State initiative initiated in 1998 to attract the semiconductor industry to the state by identifying and advancing "qualified" sites that were consistent with conceptual semiconductor industry profiles. OCIDA's objective was to further the County's economic development agenda by providing a site that met the SEMI-NY criteria and could be presented as a qualified site for a semiconductor manufacturing facility under the SEMI-NY program. To support OCIDA's efforts to obtain the SEMI-NY "qualified" site designation for its site, OCIDA prepared a SEQRA Generic Environmental Impact Statement (GEIS) to assess potential environmental and socio-economic impacts associated with full build-out of the 300-acres by a yet to be determined semiconductor company.

From 2017 to the present, OCIDA has made significant investments to advance and market the WPCP, with the semiconductor industry targeted as the site's highest and best use. In the ensuing years following the initial creation and focused marketing of the WPCP, the semiconductor industry, for several commercial reasons, has transitioned toward the construction and use of a Fab complex, which typically consists of two to four fabrication facilities operating at a single site; a trend introduced in Asia and Europe and now replicated in the United States. The semiconductor industry of today focuses on economies of scale; the need to build fewer, larger Fabs; and the managerial and economic benefits regarding workforce and reducing operational downtimes during expansions. This has resulted in the need for 1000-acre sites.

As a result, over the past six years, OCIDA decided to purchase adjacent land to enlarge the WPCP to accommodate this new industry model. The WPCP is now over 1,400 contiguous acres. This size makes it considerably larger than most available sites in New York. Considering other critical additional project needs beyond sheer size (e.g., proximity to a sufficient supply of electricity and water, wastewater treatment, and natural gas) further diminishes the number of available sites that can accommodate modern semiconductor manufacturing. Overlaying the acreage and infrastructure needs with access to multi-modal transportation and labor needs is often a point of failure for most other sites, which might otherwise meet the acreage need. Accordingly, sites that substantially meet Micron's site selection criteria are not commonly available, which further supports Micron's selection of the WPCP for the proposed Micron Campus.

OCIDA utilized the development of a GEIS (2013) and the follow-up Supplemental Generic Environmental Impact Statement (SGEIS), completed in 2021, to evaluate potential locations throughout Onondaga County for development of a site suitable to attract semiconductor manufacturing. OCIDA, in 2013, and again in 2021, selected the WPCP as its preferred site to attract private industrial and commercial development because of its size, potential for industrial zoning, access to transportation, proximity of utilities, as well as a history of Town of Clay efforts to facilitate industrial development at the property.

The 2013 GEIS considered several other potential sites in addition to WPCP:

- Radisson Corporate Park – 950 acres in the Town of Lysander;
- Hancock Air Park – 200 acres adjacent to the Syracuse Hancock Airport;
- Collamer Crossings Business Park – 200 acres in the Town of Dewitt located near NYS Route 298, I-90, I-481; and
- Syracuse Research Park – 99-acre site adjacent to Syracuse University.

OCIDA deemed the Radisson Corporate Park as an unviable choice because it lacked sufficient room and it did not offer the location specific advantages such as the proximity to I-81 and I-481/NY 481 that the WPCP did. Neither the Hancock Air Park nor the Collamer Crossing Business Park were deemed viable options because the available lots were small and could not accommodate large industrial uses. The Syracuse Research Park was available for light industrial use, but OCIDA concluded that it could not easily accommodate large-scale industrial uses.

The 2013 GEIS evaluated three (3) different site layouts for the WPCP: 1) a layout that provided 1 million sf of development while avoiding all State-mapped wetlands; 2) a layout that provided 1.5 million sf of development that balanced approximately 4.2 acres of wetland impacts against the additional benefits from the larger size of development; and 3) a layout that provided over 2 million sf balanced against additional impacts to wetlands. OCIDA identified the third alternative as the “preferred alternative” in the 2013 GEIS based on the overall economic returns versus the degree of environmental impacts. The 2013 GEIS also included a 2012 engineering report evaluating three (3) options for extending sanitary sewer service to the WPCP: 1) use of Verplank Road north of NYS Route 31; 2) use of the NYS Route 31 right-of-way; and 3) use of the Metropolitan Water Board (now OCWA) right-of-way south of NYS Route 31. The 2012 engineering report built from a 2003 feasibility study, the *Semi-NY Sewer Route Feasibility Study*, which evaluated five (5) sanitary sewer line routing options. OCIDA selected the third option for extension of sanitary sewer service to the WPCP as the preferred alternative.

The 2021 SGEIS revisited the question of whether the WPCP was the preferred alternative to attract industrial and commercial development to Onondaga County. The SGEIS compared WPCP to the

same alternative candidate sites that the 2013² GEIS assessed, again concluding that “[n]one of the previously considered alternative locations would be able to accommodate the large-scale industrial use that the [White Pine Commerce] Park is promoting due to size limitations and proximity to services and necessary infrastructure.”

The 2021 SGEIS concluded that significant expansion of the WPCP was feasible and more likely to attract leading edge manufacturing, such as semiconductor manufacturing. The alternative locations considered in the 2021 SGEIS were rejected as much too small to accommodate semiconductor manufacturing. The 2021 SGEIS assessed the additional potential significant adverse impacts from a larger facility and the creation of a shovel-ready WPCP by increasing the size of the development parcel to approximately 1,250 acres (later expanded to the current approximately 1,400 acres). OCIDA indicated in the SEQRA Findings Statement that “consistent with social, economic and other essential considerations from among the reasonable alternatives available, the action is the one that avoids or minimizes adverse impacts to the maximum extent practicable, and that adverse impacts will be avoided or minimized to the maximum extent practicable by incorporating as conditions to the decision those mitigation measures that were identified as practicable.”

On August 9, 2022, President Biden signed into law the CHIPS Act making over \$50 billion available “to strengthen American manufacturing, supply chains, and national security, and invest in research and development, science and technology, and the workforce of the future to keep the United States the leader in the industries of tomorrow, including nanotechnology, clean energy, quantum computing, and artificial intelligence.”⁵

On August 11, 2022, New York State Governor Kathy Hochul signed into law the Green CHIPS Act, which provides up to \$10 billion in economic incentives for environmentally friendly semiconductor manufacturing and supply chain projects (Ch. 494, L. 2022). The Green CHIPS legislation was passed to align with the provisions of the Federal CHIPS Act for the purpose of attracting domestic semiconductor manufacturing and related activities to New York State.

On October 4, 2022, Micron announced plans to invest up to \$100 billion over the next 20-plus years to develop a new leading edge semiconductor manufacturing facility at what is now known as the WPCP in Clay, New York, with a first-tier investment of \$20 billion planned by the end of this decade. Micron intends to apply for funding from both the CHIPS Act and the Green CHIPS Act to assist in the financing of the Proposed Project. Micron and Empire State Development (ESD), the umbrella organization of New York State’s two principal economic development public-benefit corporations, established a framework, known as the Community Investment Framework, outlining the shared investments to be made by Micron and the State of New York. This framework

⁵ FACT SHEET: CHIPS and Science Act will Lower Costs, Create Jobs, Strengthen Supply Chains, and Counter China, August 9, 2022, The White House. <https://www.whitehouse.gov/briefing-room/statements-releases/2022/08/09/fact-sheet-chips-and-science-act-will-lower-costs-create-jobs-strengthen-supply-chains-and-counter-china/>

will allow for the strengthening of the existing regional workforce and to create new growth and expansion of the workforce overall.

Micron's Proposed Project is the long-anticipated fulfillment of OCIDA's original goal to attract a state-of-the-art manufacturing facility to generate high-paying employment opportunities in Onondaga County. Micron's investment also furthers recent United States and New York State policies and programs to incentivize domestic semiconductor manufacturing.

4 Project Alternatives

4.1 INTRODUCTION

SEQRA requires the evaluation of alternatives to the Proposed Project, including either alternative sites or alternative designs, as well as a No Action Alternative. The evaluation of alternative site locations to be presented in the DEIS for the Proposed Project will be based upon the prior evaluation of alternative sites reflected in the earlier SEQRA analyses prepared by OCIDA as well as work completed by the New York State Economic Development Council (Project Rhino). See Table 1 for a summary of the various alternatives considered previously in the establishment of WPCP and those that will be carried into the DEIS for consideration.

4.2 DISCUSSION OF ALTERNATIVE PROJECT LOCATIONS

4.2.1 Alternative Sites in New York State

The DEIS will include a discussion of project location needs for semiconductor manufacturing in general and Micron in particular. The DEIS will also discuss the process previously undertaken by New York State to identify candidate sites for semiconductor manufacturing over recent years. That process identified four (4) sites throughout New York State as “shovel ready” sites for semiconductor manufacturing: STAMP in Genesee County, WPCP in Onondaga County, Marcy Nanocenter in Oneida County, and Luther Forest Technology Campus in Saratoga County. The DEIS will discuss the three alternative shovel ready sites and detail why they are not suitable alternative locations for the Proposed Project. For example, since 2012, GlobalFoundries U.S., Inc. has operated a semiconductor manufacturing facility at the Luther Forest Technology Campus in Saratoga County. Marcy Nanocenter Parcel #1 was previously developed into a manufacturing facility for Wolfspeed. The remaining parcel at Marcy Nanocenter is only 438 acres, too small for the proposed project. Some development has already occurred at STAMP and the remaining available acreage at that site also is too small to accommodate the Proposed Project.

In 2018 the New York State Economic Development Council (NYSEDC) prepared a “Competitive Site Location Benchmarking for Semiconductor Manufacturing” study (also known as “Project Rhino”). The purpose of the benchmarking study was to assess and compare four (4) sites in New York State, including WPCP, for their readiness to support semiconductor manufacturing; benchmark those four (4) sites against six (6) other sites located throughout the United States; and identify other industrial sectors that might be attracted to New York State to support semiconductor manufacturing. The study was based upon a hypothetical semiconductor manufacturing facility and evaluated each of the sites against a number of quality, cost, and economic incentive factors.

The qualitative assessment evaluated the sites against five categories, each of which had several factors included: site quality and suitability; workforce and community alignment; utilities capacity, quality, and reliability; economic development and regulatory context; and incentive capacity and capability. WPCP ranked second nationally for access to utilities and readiness of those utilities to serve the site. It was noted that all four New York State sites ranked first through fourth for the degree to which tax and non-tax incentives have been made available from the State and local governments. Lastly, three of the New York sites, including WPCP, ranked in the top five for economic development and regulatory support.

While all four New York State sites were among the most expensive in terms of construction costs, personnel, water and wastewater, and real estate and personal income taxes, the New York State sites had a competitive advantage on electricity and natural gas costs. On balance, the study concluded that New York State led all competitors in terms of the capacity, capability, and probability of delivering a meaningful incentives package.

The DEIS will include a summary of the prior New York State site selection process and detail why alternative semiconductor locations in New York State cannot accommodate the Proposed Project.

4.2.2 Alternative Sites and Design Options in Onondaga County

As previously noted, as part of its effort to develop a “shovel-ready” industrial park in Onondaga County, OCIDA evaluated a number of potential locations throughout the county. OCIDA ultimately selected WPCP as its preferred site to attract private industrial and commercial development because of its size, potential for industrial zoning, access to transportation, proximity of utilities, as well as a history of Town of Clay efforts to facilitate industrial development at the property.

The 2012 DGEIS prepared by OCIDA evaluated three (3) different site layouts for WPCP: 1) a layout that provided 1 million sf of development while avoiding all State-mapped wetlands; 2) a layout that provided 1.5 million sf of development that balanced approximately 4.2 acres of wetland impacts against the additional benefits from the larger size of development; and 3) a layout that provided over 2 million sf balanced against additional impacts to wetlands. OCIDA identified the **third alternative as the “preferred alternative” in the 2012 DGEIS** based on the overall economic returns versus the degree of environmental impacts. The DGEIS also included a 2012 engineering report evaluating three (3) options for extending sanitary sewer service to WPCP: 1) use of Verplank Road north of NYS Route 31; 2) use of the NYS Route 31 right-of-way; and 3) use of the Metropolitan Water Board (now OCWA) right-of-way south of NYS Route 31. The 2012 engineering report built from a 2003 feasibility study, the *Semi-NY Sewer Route Feasibility Study*, that evaluated five (5) sanitary sewer line routing options. OCIDA selected the third option for extension of sanitary sewer service to WPCP as the preferred alternative.

The 2021 Final SGEIS prepared by OCIDA revisited the question of whether WPCP was the preferred alternative to attract industrial and commercial development to Onondaga County, and compared it to the same alternative candidate sites that were assessed in the 2012 DGEIS, concluding that “[n]one of the previously considered alternative locations would be able to accommodate the large-scale industrial use that the [White Pine Commerce] Park is promoting due to size limitations and proximity to services and necessary infrastructure.” The 2021 Final SGEIS further concluded that significant expansion of WPCP was feasible and more likely to attract leading edge manufacturing, such as semiconductor manufacturing. The 2021 SGEIS assessed the additional potential significant adverse impacts from a larger facility (up to 4 million sf of manufacturing space) and increase in size of the development parcel to approximately 1,250 acres. OCIDA indicated in the SEQRA Findings Statement that “consistent with social, economic and other essential considerations from among the reasonable alternatives available, the action is the one that avoids or minimizes adverse impacts to the maximum extent practicable, and that adverse impacts will be avoided or minimized to the maximum extent practicable by incorporating as conditions to the decision those mitigation measures that were identified as practicable.”

The DEIS will include a summary of the prior Onondaga County site selection process, but will not include detailed impact assessment of any of the candidate sites included in that prior process.

4.2.3 Other Alternatives Considered but Determined Not Feasible

The DEIS will include a summary of other alternatives previously considered but determined not to be feasible, including an alternative that relies exclusively on alternative sources of energy (beyond use of renewable energy for purchased electricity).

The DEIS will also summarize previous Onondaga County Water Authority studies evaluating potential alternative sources of water.

4.3 ALTERNATIVES TO BE CONSIDERED IN THE DEIS

4.3.1 No Action Alternative

Under the No Action Alternative, WPCP would **delay OCIDA's long-standing** efforts to develop the WPCP, with a particular focus on development that will bring high-tech facilities and high paying jobs to Onondaga County. OCIDA's 2021 Final SGEIS concluded that development of up to 4 million sf of manufacturing space would avoid, minimize, or mitigate adverse environmental impacts to the maximum extent practicable. The WPCP would therefore remain vacant land until such time as OCIDA identified another development proposal for the WPCP.

4.3.2 The Proposed Project

Micron intends to build a semiconductor manufacturing facility campus (the “Micron Campus”) at the expanded WPCP, which will be built-out over an approximately 20-year period with four

Fabs. It is expected that Fabs will be continuously fit-out and construction on the next Fab will be in sequence as the prior Fab finishes fit-out. The DEIS will analyze an interim analysis year of 2031 with Fab 1 in operation and Fab 2 under construction and anticipated completion of major off-site transportation improvements,⁶ 2037 with Fab 1 and Fab 2 operating and construction of Fab 3 underway, as well as a final analysis year of 2041 with all four Fabs in operation with on-going fit-out of Fab 4).

4.3.3 The Proposed Project with No Access from US Route 11

Micron intends to build a site access road from US Route 11 in the Town of Cicero to facilitate construction and operation access to the Proposed Project once construction of Fab 3 commences. The DEIS will analyze an alternative access scenario that eliminates this site access road from the Micron Campus to US Route 11. In this alternative, all access to the Micron Campus would be from NYS Route 31 and Caughdenoy Road.

4.3.4 Alternative Internal Configurations of the Proposed Project

Consistent with the requirements of the Clean Water Act (Section 404(b)(1)), which governs the filling of wetlands, Micron must demonstrate that the Proposed Project is the least environmentally damaging practicable alternative (“LEDPA”). In accordance with USEPA “Guidelines for Specification of Disposal Sites for Dredged or Fill Material (40 CFR Part 230), Micron has developed an alternative analysis to evaluate the reasonableness and practicableness of several on-site layout alternatives. The DEIS will consider these on-site layout alternatives.

4.3.5 Reduced Scale Proposed Project

The DEIS will consider an alternative development site plan reflecting a reduced scale of the Proposed Project, which would comprise only the first two Fabs, as described above. All of the same off-site improvements would be considered as part of the Reduced Scale Proposed Project and while the improvements would be scaled to the requirements of the smaller project, the areal extent of disturbance to construct those conveyances would be substantially similar to that required for the Proposed Project while only realizing half of the economic and social benefits from the Proposed Project.

The purpose of this alternative is to assess significant adverse effects from a reduced scale project and compare such effects to the Proposed Project.

⁶ The 2031 interim year analysis will evaluate any traffic, air quality, noise, and construction impacts for what is projected to be a peak of operations and construction employment. For other areas of impact analysis, the 2037 analysis year representing completion of Fab 1 and Fab 2 will be used to reflect the larger amount of project completion at that time.

TABLE 1 SUMMARY OF ALTERNATIVES CONSIDERED OR TO BE CONSIDERED

Alternatives Considered	Status of Alternative
Alternative Sites Considered in New York State	
STAMP in Genesee County	Withdrawn from further consideration because some development has already occurred, and the remaining parcel is too small for the proposed project.
Marcy Nanocenter in Oneida County	Withdrawn from further consideration because the site was previously developed into a manufacturing facility for Wolfspeed.
Luther Forest Technology Campus in Saratoga County	Withdrawn from further consideration because, since 2012, GlobalFoundries has operated a semiconductor manufacturing facility on this site.
Previous Alternatives Considered in OCIDA 2013 Generic EIS (GEIS) for White Pine Commerce Park	
Radisson Corporate Park	Withdrawn from further consideration because it lacked room and did not offer the location specific advantages such as proximity to Interstate 81.
Hancock Air Park	Withdrawn from consideration because it could not easily accommodate large-scale industrial uses.
Collamer Crossings Business Park	
Syracuse Research Park	
Concept 1: 1 million square foot development – no wetland impacts	
Concept 2: 1.5 million square foot development – 4.2 acres of wetland impacts	Withdrawn from consideration because it could not easily accommodate large-scale industrial uses.
Concept 3: 2 million square foot development – additional wetlands impacts	
Concept 3: 2 million square foot development – additional wetlands impacts	
Previous Alternatives Considered in OCIDA 2021 Supplemental GEIS for White Pine Commerce Park	
Alternative 1: Retain site as open space	Withdrawn from consideration because it could not easily accommodate large-scale industrial uses.
Alternative 2: Same as Concept 3 in OCIDA’s 2013 GEIS	Withdrawn from consideration because it could not easily accommodate large-scale industrial uses.
Alternative 3: Comparable to Alternative 2 but at smaller scale	
Preferred Alternative: 4 million square feet development – additional wetlands impacts	OCIDA identified this alternative as the preferred alternative in the Supplemental GEIS based on the overall economic returns versus the degree of environmental impacts.
Other Alternatives Considered but Determined to be Not Feasible	
Alternative Energy Sources	The DEIS will describe how Micron’s Proposed Project could not rely exclusively on alternative energy sources (beyond use of renewable energy for purchased electricity) before reliable energy sources are identified and developed.
Alternatives to be Considered in the Draft EIS for the Micron Semiconductor Fabrication Project	
No Action	These alternatives will be considered in the DEIS for the Micron Semiconductor Fabrication Project in Clay, NY.
Proposed Project (4 fabs)	
Proposed Project No Access from US Route 11	
Proposed Project Alternative Internal Configurations* – Options 2, 3, 4, 5, 6 and 7	
Reduced Scale Proposed Project (2 fabs)**	

* Note: Proposed Project– Alternative Internal Configuration Option 1 is the Proposed Project (4 fabs).

** This alternative is similar to the Preferred Alternative: 4 million square feet development identified in the OCIDA 2021 SGEIS.

5 Analysis Framework

This section outlines the analytical framework that will be used to complete the DEIS. It describes the reasoning behind the chosen analysis year(s) and study area(s) and outlines the methodology used to establish baseline conditions from which the environmental effects will be analyzed.

5.1 ORGANIZATION OF THE ENVIRONMENTAL IMPACT STATEMENT

Preparation of the DEIS will conform to 6 NYCRR Part 617.9(b). The Proposed Project will be evaluated for potential significant adverse effects to the Project Site⁷ and applicable study areas for all relevant environmental technical categories in accordance with applicable SEQRA requirements. The DEIS will consider short-term (construction) and long-term (operational) effects (including direct and indirect effects) of the Proposed Project. Cumulative impacts will also be addressed, as applicable. The DEIS will identify proposed mitigation for any significant adverse environmental impacts. The DEIS shall include a list of all Involved and Interested Agencies to which copies of the DEIS and supporting material will be distributed. See Table 2, "Preliminary List of SEQRA Lead, Involved, and Interested Agencies," and Table 3, "Preliminary List of Federal Agencies," in Section 6.

Consistent with those regulations, the DEIS technical chapters are proposed as shown below. Appendices of the DEIS will contain any detailed technical studies used to complete the DEIS.

- Cover Sheet (see below)
- Table of Contents
- Executive Summary
- Chapter 1 – Purpose and Need
- Chapter 2 – Project Alternatives and Description of the Proposed Project
- Chapter 3 – Land Use, Zoning, and Public Policy
- Chapter 4 – Community Facilities, Open Space and Recreation
- Chapter 5 – Socioeconomic Conditions
- Chapter 6 – Environmental Justice
- Chapter 7 – Historic and Cultural Resources
- Chapter 8 – Visual Impacts and Community Character
- Chapter 9 – Geology, Soils, and Topography
- Chapter 10 – Water Resources
- Chapter 11 – Ecological Communities and Wildlife
- Chapter 12 – Solid Waste
- Chapter 13 – Hazardous Materials

⁷ References to the "Project Site" refer to any location where elements of the Proposed Project or off-site improvements will be constructed.

- Chapter 14 – Transportation
- Chapter 15 – Air Quality
- Chapter 16 – Greenhouse Gas Emissions and Climate Change
- Chapter 17 – Noise and Vibration
- Chapter 18 – Utilities and Infrastructure
- Chapter 19 – Use and Conservation of Energy
- Chapter 20 – Construction
- Chapter 21 – Permits
- Chapter 22 –Cumulative Impacts
- Chapter 23 – Unavoidable Adverse Impacts
- Chapter 24 – Growth Inducing Aspects
- Chapter 25 – Irreversible and Irrecoverable Commitment of Resources
- Chapter 26 – Mitigation
- Appendices

Consistent with 6 NYCRR Part 617.9(b)(3), the DEIS Cover Sheet shall:

- (i) identify the document as a DEIS;
- (ii) identify the name of the Proposed Project;
- (iii) identify the location of the Proposed Project;
- (iv) identify the name and address of the Lead Agency and the contact information of a person at the agency who can provide further information;
- (v) identify the names of individuals and organizations that prepared any portion of the DEIS;
- (vi) identify the date the DEIS was accepted as complete with respect to the Final Scope by the Lead Agency; and
- (vii) identify the date of the DEIS Public Hearing and the closing of the Public Comment Period.

5.2 ANALYSIS YEARS

The following analysis years (build years) will be included in the DEIS for the Proposed Project. Selection of analysis years is based on Micron's projected operations and construction employment and peak levels of activities:

- 2031 — Interim analysis year with Fab 1 in operation and Fab 2 under construction and anticipated completion of major off-site transportation improvements⁸;

⁸ The 2031 interim year analysis will evaluate any traffic, air quality, noise, and construction impacts for what is projected to be a peak of operations and construction employment. For other areas of impact analysis, the 2037 analysis year representing completion of Fab 1 and Fab 2 will be used to reflect the larger amount of project completion at that time.

- 2037 — Interim analysis year with Fab 1 and Fab 2 operating and construction of Fab 3 underway; and
- 2041 — All four Fabs in operation with on-going fit out of Fab 4.

Specific study areas for technical evaluations will be established and described in each chapter as appropriate (i.e., traffic intersections for analysis).

5.3 METHODOLOGIES FOR TECHNICAL ANALYSES

5.3.1 Technical Studies

The environmental review will include site-specific evaluations and studies of the full range of technical areas needed to comply with SEQRA. The following bullets identify the key environmental topics that could result in potential adverse impacts that will be studied. If environmental analysis reveals any significant adverse impacts, the document will identify any reasonable measures to minimize or mitigate those impacts. To the extent applicable, prior studies completed by OCIDA as part of its generic environmental impact statements will be referenced in the site-specific assessments completed as part of the current environmental impact statement.

- **LAND USE, ZONING, AND PUBLIC POLICY:** This analysis will assess land use, zoning, and public policy, including relevant New York State policy related to Green CHIPS. Zoning compliance of the Proposed Project will be assessed where project elements are proposed. The study area for the land use assessment will be one mile from the Micron Campus as well as, where relevant, any other areas where off-site development is proposed to occur. Public policy assessments will cover the Town of Clay, Town of Cicero, and Onondaga County, as appropriate. This analysis will also identify reasonably foreseeable development projects (projects known or likely to be built within the time horizon of the Proposed Project in the study area) based on information obtained from the Town of Clay, Town of Cicero, and Onondaga County. Changes in land use and/or zoning that may result from the Proposed Project, either directly or indirectly, will be described and evaluated. Consistency with any applicable local or regional policies, including the SMTC 2050 Long Range Transportation Plan, Onondaga County Comprehensive Plan, Onondaga County Climate Action Plan, Town of Clay Comprehensive Plan (if available; draft anticipated in March 2024), Town of Clay Northern Land Use Study, Town of Clay Local Waterfront Revitalization Program (LWRP) (for proposed modifications to the Oak Orchard WWTP), Town of Cicero Comprehensive Plan (if available; draft anticipated in April 2024), and City of Oswego LWRP (for proposed improvements to water supply infrastructure) will be evaluated.
- **COMMUNITY FACILITIES/OPEN SPACE AND RECREATION:** The police, fire, emergency, and community service providers within the Town of Clay and the Town of Cicero, and school district(s) that serve the Proposed Project will be identified and the impacts to each service will be analyzed with potential mitigation identified where significant adverse impacts are identified. The relevant Town of Clay and Town of Cicero departments will be consulted regarding the

existing staffing of emergency services; planned changes to staffing levels, service levels, equipment and/or facilities; and how those departments would respond to emergency situations at the site. The DEIS will assess potential impacts of the Proposed Project on staffing levels, service levels, equipment and/or facilities on- and off-site. The chapter will discuss separation distance between buildings, proposed fire access, and construction in accordance with applicable building and fire codes. The chapter will also describe and map existing parks and recreational resources on-site and within one mile of the Micron Campus, including walking paths and trails. Using information made available by the State/County/Town parks agencies, the assessment will include a discussion of planned changes to existing parks and recreational resources, and/or development of new parks and recreational resources anticipated to occur in the future without the Proposed Project. Potential direct and indirect impacts of the Proposed Project on parks and recreational facilities will be assessed. Operations of the Proposed Project may result in new residential populations that may generate additional school children. The DEIS will identify enrollment trends for the following school districts and will identify whether any of these school districts may require capacity enhancements: North Syracuse Central School District (CSD), Baldwinsville CSD, Liverpool CSD, Central Square CSD, and Phoenix CSD.

- **SOCIOECONOMIC CONDITIONS:** This analysis will examine the potential direct and indirect effects of the Proposed Project on population, housing, and economic activities within local and regional study areas. The local study area will be the Town of Clay, and the regional study area will include Onondaga County and surrounding counties in the Central New York region (the area from which most Micron employees would reside). The analysis will use a variety of data sources including the U.S. Census Bureau, New York State Department of Labor, Syracuse Metropolitan Transportation Council (SMTC), OCIDA, Empire State Development (ESD), and study area municipalities to present: existing demographic and workforce characteristics; changes that are expected to occur in the future independent of the Proposed Project; and the potential impacts of the Proposed Project. The impact assessment will consider changes in demographics and housing costs, property taxes, changes in labor supply and effects on existing businesses, and municipal costs generated by the Proposed Project. In addition to considering potential adverse effects, the analysis will describe anticipated social and economic benefits such as jobs, economic and workforce development opportunities, and municipal and state tax revenues. **The DEIS will also describe Micron's efforts to work with community leaders through the Community Engagement Committee (CEC) (an entity convened by the Governor's Office, Micron, and local elected officials) to consider how project benefits can be distributed throughout the affected communities, including to communities of color or low-income communities. This is necessary to issue findings where agencies must balance social and economic considerations against environmental impacts that cannot be avoided or mitigated.**
- **ENVIRONMENTAL JUSTICE:** The environmental justice study area will include all census block groups that are within or intersect a 10-mile radius of the Proposed Project as well as the area that

could be affected by changes in traffic patterns resulting from the Proposed Project. The environmental justice study area also encompasses the areas that would be affected by the off-site improvements. Pursuant to the Laws of New York (2022) ECL § 8-0113(2)(b), this analysis will consider the direct or indirect impacts of the Proposed Project on any identified low-income, minority, or “disadvantaged communities” (as defined in ECL § 75-0101(5)), including whether the Proposed Project may cause or increase a disproportionate pollution burden on those communities. This analysis will also follow Executive Order 12898 on Environmental Justice, “Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations,” Executive Order 14008, “Tackling the Climate Crisis at Home and Abroad,” and Executive Order 14096, “Revitalizing our Nation’s Commitment to Environmental Justice for All,” to determine whether the Proposed Project will result in any disproportionate and adverse impacts on minority or low-income populations (in anticipation of consistency with federal guidelines as part of federal NEPA review or permitting for the Proposed Project). This analysis will also describe the public outreach undertaken to inform and involve minority and low-income populations who may be affected by the Proposed Project.

- **HISTORIC AND CULTURAL RESOURCES:** This analysis will document the Proposed Project’s impact on historic and cultural resources consistent with Section 14.09 of the New York State Historic Preservation Act, and NYSDEC Commissioner Policy 42, “Contact, Cooperation, and Consultation with Indian Nations.” An Area of Potential Effects (APE) (study area) will be defined for potential direct effects covering any location where construction would occur as well as a ¼-mile study area for potential indirect effects where construction activities would result in permanent above-ground features that could have the potential to indirectly affect historic architectural resources. The New York State Office of Parks, Recreation, and Historic Preservation (OPRHP) Cultural Resources Information System (CRIS) will be consulted to identify if there are any known listed or eligible structures within the APE. Additionally, any previously unidentified historic resources in the APE will be identified and evaluated. The evaluation will assess the potential of the Proposed Project to affect historic and cultural resources in the APE including buried archaeological resources through consultation with the New York State Historic Preservation Office (SHPO). It is anticipated that Section 106 of the National Historic Preservation Act compliance would be completed by a Federal agency as part of federal permitting for the Proposed Project.
- **VISUAL IMPACTS AND COMMUNITY CHARACTER:** This analysis will evaluate the Proposed Project for potential visual and community character impacts within a five-mile radius of the Micron Campus and ¼-mile from the Childcare Site and rail spur site (which are included within the five-mile radius of the Micron Campus) and ¼-mile from above-ground structures associated with the off-site improvements. This section of the DEIS will detail the existing aesthetic characteristics of the WPCP and surrounding area through descriptive text and representative photographs including a description of prevalent landforms and vegetative cover. Potential changes in views of the Proposed Project and its surroundings will be evaluated through comparisons of post-development conditions to the existing conditions and to the established

aesthetic character of the surrounding area. The analysis will identify and describe significant views into the existing WPCP from a range of representative publicly accessible vantage points and aesthetic resources and the preservation of existing vegetative buffers. The visual and architectural character of the Proposed Project, with special attention to the site lighting and off-site visibility of buildings and structures will be assessed. Assessment of impacts shall be based on the NYSDEC Program Policy document "Assessing and Mitigating Visual and Aesthetic Impacts" last revised December 13, 2019.

- **GEOLOGY, SOILS, AND TOPOGRAPHY:** This analysis will identify the major geologic and soil conditions within areas where construction of the Proposed Project and off-site improvements would occur, focusing on suitability of the property for development and stormwater management purposes, as applicable. The analysis will use information readily available from the United States Department of Agriculture's Natural Resources Conservation Service (e.g., soil survey) as well as the geotechnical investigation of the Micron Campus to complete this chapter. Any soils classified as prime agricultural soils will be identified. The assessment will also include a slope map and discussion of proposed modifications to site topography including categories of 0-10%, 10-15%, 15-25% and 25% or greater. A summary of the geotechnical investigation and cut and fill analysis for the Micron Campus will also be included.
- **WATER RESOURCES:** This analysis will address the potential impacts to water resources present on the Project Site or in any area impacted by off-site improvements, including groundwater, streams and wetlands. Groundwater levels will be described from geotechnical investigations. Wetlands will be delineated using the three-part standard outlined in the 1987 U.S. Army Corps of Engineers delineation manual, with the boundaries verified through the Jurisdictional Determination process. New York State regulated wetlands will also be delineated pursuant to the standards set forth at Article 24 of the Environmental Conservation Law and NYSDEC's freshwater wetlands regulations set forth at 6 NYCRR Part 663. Any water resources will be characterized and any potential adverse impacts to them will be assessed and potential mitigation identified. The DEIS will include an assessment of wetland functions and services. A physical and chemical characterization of Youngs Creek will be presented in the DEIS based on site reconnaissance. The Proposed Project's location with respect to any floodplain would also be documented. A Stormwater Pollution Prevention Plan (SWPPP) prepared pursuant to the NYSDEC *Stormwater Management Design Manual* will be prepared for the Proposed Project and included as an appendix to the DEIS. Potential impacts of stormwater generated by the Proposed Project on streams and wetlands will be described in the DEIS. While specific impacts and mitigation measures are not known at this time, impacts to streams and wetlands from the Proposed Project are likely. Stream and wetland mitigation could include on-site or off-site stream or wetland creation, restoration, or enhancements approved by USACE and NYSDEC. The wetland delineation report and draft conceptual compensatory mitigation plan will be included as an appendix to the DEIS.
- **ECOLOGICAL COMMUNITIES AND WILDLIFE:** This analysis will address the potential impacts to ecological communities (terrestrial and aquatic) and wildlife. The U.S. Fish & Wildlife Service

(USFWS) Information, Planning, and Consultation System (IPaC) and New York State Natural Heritage Program database will be queried for any known or potential threatened or endangered species within the study area, which includes the Project Site as well as any areas where off-site improvements would be constructed. This will include an assessment for the presence of, and potential impacts to, threatened and endangered species for all linear utility construction projects, new infrastructure, and the expansion of existing infrastructure (e.g., Oak Orchard Wastewater Treatment Plant and the Lake Ontario water filtration plant). Consultation with NYSDEC and USFWS to develop protocol for assessing presence of habitat for any identified species and protocol for assessing potential impacts to any identified species will be undertaken. Summaries of field studies will be included as an appendix to the DEIS. The DEIS will include characterization of wildlife within the Project Site based on literature review and field observations collected seasonally, including winter and migration seasons. Field studies will identify existing plant species that are invasive, non-native, or both invasive and non-native. Field studies will also include characterization of aquatic wildlife (biology) within Youngs Creek. Potential impacts to wildlife that will be considered in the DEIS include, but are not limited to, habitat fragmentation, noise, lighting, pollution, human activity and traffic. The DEIS will include a commitment to prepare and implement an invasive species management plan as a condition of site plan approval.

- **SOLID WASTE:** This analysis will describe the proposed generation of solid waste by the Proposed Project and how that material will be handled, stored, and transported. This analysis will describe Micron's proposed measures to reduce generation of solid waste through reuse or recycling. This analysis will describe Onondaga County's Solid Waste Management Plan and how the Proposed Project would comply. The analysis will consider the capacity of the existing waste management network and the ability to accept increased volumes generated by the Proposed Project as well as the anticipated population growth in the study area. Approximate timing of expansion of waste or recycling facilities, if needed, will be discussed.
- **HAZARDOUS MATERIALS:** The assessment of hazardous materials will include Phase I environmental site assessments compatible with American Society for Testing and Materials (ASTM) standards (E1527-21) to identify potential areas of concern within areas where construction of the Proposed Project would occur. All pertinent environmental databases will be reviewed for each off-site improvement area and site inspections will be conducted where feasible. Phase II environmental sampling would be conducted as needed and to the extent practicable. Any warranted remedial approaches for addressing identified or potential contaminated materials would be described. The chapter will identify any hazardous materials (including any chemical or petroleum bulk or other storage) that would be used, stored, transported, or generated by the Proposed Project and measures to protect against releases to the environment and impacts to human health, including worker safety. Hazardous wastes as identified in 6 NYCRR Part 371.4 that the Proposed Project may generate will be described, including the type of hazardous waste anticipated to be generated, estimated volumes, storage methods, disposal options, and how the facility will comply with hazardous waste

regulations at 6 NYCRR Part 370-373. Potential mitigation measures to be considered include an evaluation of methods to reduce generation of hazardous waste.

- **TRANSPORTATION:** Construction and operation of the Proposed Project can be expected to generate a substantial number of new vehicular trips on the local and regional highway network including local roads and I-81 and NYS Route 481. The DEIS will describe the existing transportation network, project conditions in the future with and without the Proposed Project and will assess potential impacts associated with the Proposed Project, such as changes to intersection and roadway capacity and Levels of Service as well as access to existing and anticipated uses along key highway corridors serving the Project Site. In consultation with NYSDOT, New York State Thruway Authority, and Onondaga County Department of Transportation, automatic traffic recorder (ATR), turning movement counts (TMC), and vehicle classification counts (VCC) will be conducted. See Appendix A for additional information on the locations of proposed traffic data collection. Analysis will consider the effects of Proposed Project operations and construction, including during times when both operations and construction overlap. The DEIS will also describe the site driveways, internal circulation roadways, and parking facilities that will be part of the Proposed Project and designed to accommodate peak employee demand and on-going construction activity. The regional travel demand model developed by the Syracuse Metropolitan Transportation Council (SMTC), the designated Metropolitan Planning Organization (MPO) for the area serving the Project Site, will be used to identify existing and projected travel patterns on area roadways throughout the region. A sub-area section of SMTC's model will be used to provide the analysis foundation for a Visum transportation planning model to assign routing through the regional study area. Micro-simulation modeling of roadways and intersections within the study area will be conducted with either Vissim or Synchro traffic analysis modeling tools to analyze potential impacts of the Proposed Project in coordination with NYSDOT. Additional evaluations of existing crash patterns related to addressing safety, signal functionality, signing and striping, roadway lighting, and ITS systems will be completed to propose future improvements designed to increase safety and service in the area. While specific impacts and mitigation measures are not known at this time, impacts to area roadways due to additional traffic (during construction and during operations) from the Proposed Project are likely. Traffic mitigation may include improvements to area roadways or construction of new roadways. The DEIS will identify any proposed traffic improvements and a timetable for their implementation.

The Transportation assessment will also include an identification of, and assessment of potential impacts from the Proposed Project and off-site improvements to, transit systems operating within Onondaga County as well as the CSX freight rail operations using the railroad line adjacent to the Micron Campus.

- **AIR QUALITY:** This analysis will assess mobile source and stationary source air emissions from the Proposed Project, including air emissions from operation of the fabs as well as the increased vehicular traffic on the local and regional roads and highways. The mobile source air quality analyses will be performed in accordance with the procedures found in the NYSDOT *The*

Environmental Manual (TEM), the USEPA guidance on project-level analyses, and the FHWA's current guidance on Mobile Source Air Toxic (MSAT) analysis. Potential air quality effects associated with construction activities will also be assessed. Overall, transportation conformity is not applicable to projects in Onondaga County. Consistent with the Clean Air Act and the Final Transportation Conformity Rule, the assessment will determine whether any regional or localized impacts to air quality (beneficial or detrimental) will result from the Proposed Project, including whether the Proposed Project would cause or contribute to any new violation of any National Ambient Air Quality Standards (NAAQS) in any area or increase the frequency or severity of any existing violation of any NAAQS in any area, or delay timely attainment of any NAAQS or any required interim emission reductions or other milestones in any area.

The Proposed Project will require a stationary source air pollution control permit for the new manufacturing facilities. The air pollution control permit application will include evaluation of pollutants subject to NAAQS, New York air toxic control and ambient air requirements, and a Climate Leadership and Community Protection Act (CLCPA) greenhouse gas evaluation. The DEIS will summarize these detailed air quality modeling and impact assessment analyses that will be prepared to support the air pollution control permitting process and address potential impacts to human health from project related air emissions.

- **GREENHOUSE GAS AND CLIMATE CHANGE:** This analysis will estimate greenhouse gas (GHG) emissions from embodied carbon (carbon embodied in building materials) and construction activities and will describe anticipated facility design features that will minimize energy consumption and GHG emissions. This analysis will use the Motor Vehicle Emission Simulator (MOVES). Following the rule of reason (*Final Guidance for Federal Departments and Agencies on Consideration of Greenhouse Gas Emissions and the Effects of Climate Change in National Environmental Policy Act Reviews*), MOVES can be used for calculation of mobile source GHG emissions as inputs are available from use in the NAAQS related analysis. The GHG assessment will also follow applicable standards or guidance from the New York State CLCPA.
- **NOISE AND VIBRATION:** The Proposed Project will have the potential to increase noise levels based on construction activities and operation of the proposed facility. The increase in vehicular traffic is also likely to result increase in noise levels both on- and off-site. Noise standards as available from applicable local, state, and federal will be reviewed and used to establish impact thresholds and criteria. Traffic noise measurement and modeling methodology will use the NYSDOT TEM, Section 4.4.18, "Noise Analysis Policy and Procedures" (or "NYSDOT Noise Policy") and will use FHWA Traffic Noise Model (TNM) 2.5 to perform the traffic noise analyses. The assessment of potential noise impacts will also be conducted following the NYSDEC guidance document, "Assessing and Mitigating Noise Impacts" (DEP-00-1, Revised February 2, 2001).
- **UTILITIES AND INFRASTRUCTURE:** As noted in the Proposed Project description, there are substantial off-site infrastructure improvements that will be required to support the Proposed Project. The DEIS will identify and describe these required improvements and assess if the Proposed Project, with improvements (and acknowledging any measures that Micron can take to reduce

consumption of energy or water or generation of wastewater), has the potential to adversely affect the larger community in terms of potential impacts to water from operational usage, as well as sanitary sewer and industrial wastewater discharges. The analysis will also note connections to energy (electrical and natural gas) and telecommunications infrastructure, and capacity of those systems, as applicable.

- **USE AND CONSERVATION OF ENERGY:** This analysis will describe the Proposed Project's use and conservation of energy and measures that Micron intends to pursue to reduce energy consumption and use of renewable sources.
- **CONSTRUCTION IMPACTS:** This analysis will address impacts arising from the primary construction activities for the Proposed Project and off-site improvements, such as construction traffic on surrounding streets, noise and vibration, air quality (e.g., emissions from construction equipment), effects on adjacent historic structures, dewatering activities, and any hazardous materials that may be disturbed by construction activities. This assessment will also qualitatively discuss potential impacts associated with noise, air quality, water quality, and traffic impacts from construction of the Proposed Project.
- **CUMULATIVE IMPACTS:** The DEIS will consider any significant adverse impacts resulting from the incremental impact of the Proposed Project when added to other past, present, and reasonably foreseeable future actions. This chapter will identify the other projects or actions included in the assessment and summarize the cumulative impacts of the Proposed Project contained in each of the technical areas of evaluation.
- **UNAVOIDABLE ADVERSE IMPACTS:** This chapter will identify any impacts that are unavoidable and that cannot be reasonably mitigated.
- **GROWTH INDUCING ASPECTS OF THE PROPOSED PROJECT:** This chapter will focus on whether the Proposed Project will have the potential to induce new development within the surrounding area, including, but not limited to, White Pine South, an approximately 105-acre parcel south of the Micron Campus and NYS Route 31. As noted, one of the purposes of the Proposed Project will be to create both direct and indirect employment opportunities in Central New York. The DEIS will evaluate the environmental impacts that arise from such economic enhancements and new development.
- **IRREVERSIBLE AND IRRETRIEVABLE COMMITMENT OF RESOURCES:** This chapter will include a discussion of any irreversible or irretrievable commitments of resources.
- **MITIGATION:** This chapter will summarize any mitigation measures required to avoid, minimize or mitigate identified significant adverse effects. Mitigation measures will be described in detail in the technical analyses. While specific impacts and mitigation measures are not known at this time, impacts to wetlands and area roadways due to additional traffic (during construction and during operations) from the Proposed Project are likely. Wetland mitigation could include on-site or off-site wetland enhancements approved by USACE and NYSDEC. Traffic mitigation could include physical enhancements to area roadways, railways, and/or

signal timing changes approved by the Federal Highway Administration (FHWA), NYSDOT or Onondaga County.

6 Agency and Public Coordination

Agency and public coordination are an integral component at all stages of planning and project development, including in this SEQRA scoping process.

6.1 AGENCY COORDINATION ACTIVITIES

The agency coordination process will include coordination with various Federal, State, and local agencies (see Table 2, "Preliminary List of SEQRA Lead, Involved, and Interested Agencies" and Table 3, "Preliminary List of Federal Agencies").

OCIDA, as the lead agency for the Proposed Project, has coordinated with Micron to identify Involved and Interested Agencies to be informed and involved throughout the environmental review.

An "Involved Agency" means "an agency that has jurisdiction by law to fund, approve or directly undertake an action. If an agency will ultimately make a discretionary decision to fund, approve or undertake an action, then it is an 'involved agency' notwithstanding that it has not received an application for funding or approval at the time the SEQR process is commenced. The lead agency is also an 'involved agency'" (6 NYCRR 617.2(f)).

An "Interested Agency" means "an agency that lacks the jurisdiction to fund, approve or directly undertake an action but wishes to participate in the review process because of its specific expertise or concern about the proposed action. An 'interested agency' has the same ability to participate in the review process as a member of the public" (6 NYCRR 617.2(u)).

TABLE 2 PRELIMINARY LIST OF SEQRA LEAD, INVOLVED, AND INTERESTED AGENCIES

Agency	Potential Role	Responsibilities
Lead Agency		
Onondaga County Industrial Development Agency (State environmental review lead)	Lead Agency	SEQRA leadership and coordination, establishing final entitlement of White Pine Industrial Park and coordination of land development agreements. Sale of OCIDA property to Micron. Potential property condemnation pursuant to New York Eminent Domain Procedure Law.
Involved and Interested Agencies		
New York State Department of Environmental Conservation	Involved Agency	Title V air quality permitting, wetlands jurisdictional determination and permitting, consultation related to threatened & endangered species, SWPPP permits for on-site and off-site land disturbance, modification to existing SPDES discharge for Oak Orchard WWTP, Section 401 water quality certification, hazardous petroleum and chemical bulk storage, and SPDES Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity.
New York State Empire State Development	Involved Agency	Approval of Excelsior Jobs Program Green Chips Project Application.
New York State Office of Parks, Recreation and Historic Preservation (OPRHP)	Involved Agency	Consultation related to potential impact to historic and cultural resources. OPRHP serves as the New York SHPO.
New York State Department of Transportation	Involved Agency	Consultation in traffic impact evaluation and mitigation measures to address adverse transportation impacts on state routes and interstate highways. Potential property condemnation pursuant to New York Eminent Domain Procedure Law.
Syracuse Metropolitan Transportation Council (SMTC)	Interested Agency	General consultation and approval actions to add to official regional transportation plans.
Onondaga County Department of Planning	Interested Agency	General consultation.
Onondaga County Dept. of Transportation (OCDOT)	Involved Agency	Consultation in traffic impact evaluation and mitigation on county routes. Potential property condemnation pursuant to New York Eminent Domain Procedure Law.
Town of Clay Planning Board	Involved Agency	Site Plan/Subdivision (re-subdivision of multiple parcels) approvals including MS4/SWPPP approval.
Town of Cicero Town Board	Interested Agency	Referral per General Municipal Law.
Town of Cicero Planning Board	Involved Agency	Subdivision Approval.
City of Syracuse	Interested Agency	General consultation.
New York Power Authority	Involved Agency	Proving high-load factor energy allocation and ReCharge expansion energy allocation.
New York State Energy Research Development Authority	Interested Agency	Collaborating on Excelsior Jobs Program Green Chips Project Application..
Onondaga County Department of Water Environment Protection	Involved Agency	Enlarging wastewater treatment capacity and extending sewer lines to the Micron Campus; Modification of OCDWEP's SPDES Permit by NYSDEC; issuance of an Industrial Wastewater Discharge Permit from OCDWEP to Micron Campus.
Onondaga County Water Authority	Involved Agency	Extending potable water lines to the Micron Campus.

TABLE 3 PRELIMINARY LIST OF FEDERAL AGENCIES

Federal Agencies	
US Dept. of Commerce	Approval of CHIPS Act funding application.
US Army Corps of Engineers (USACE)	Issue 404 Wetlands permit.
Federal Highway Administration	Consultation on the need and design of alterations to the national highway system and the interstate highway system to mitigate identified adverse traffic impacts.
U.S. Environmental Protection Agency	NEPA advisory role (i.e., Environmental Justice) and consultation related to the issuance of federally-delegated Clean Air Act and Clean Water Act permits to be issued by New York State Department of Environmental Conservation.
U.S. Department of Interior, Office of Environmental Policy and Compliance	Consultation related to Section 4(f) of the U.S. Dept. of Transportation Act.
U.S. Fish & Wildlife Service	Consultation on federal Endangered Species Act compliance.

Appendix A

TRAFFIC STUDY AREA

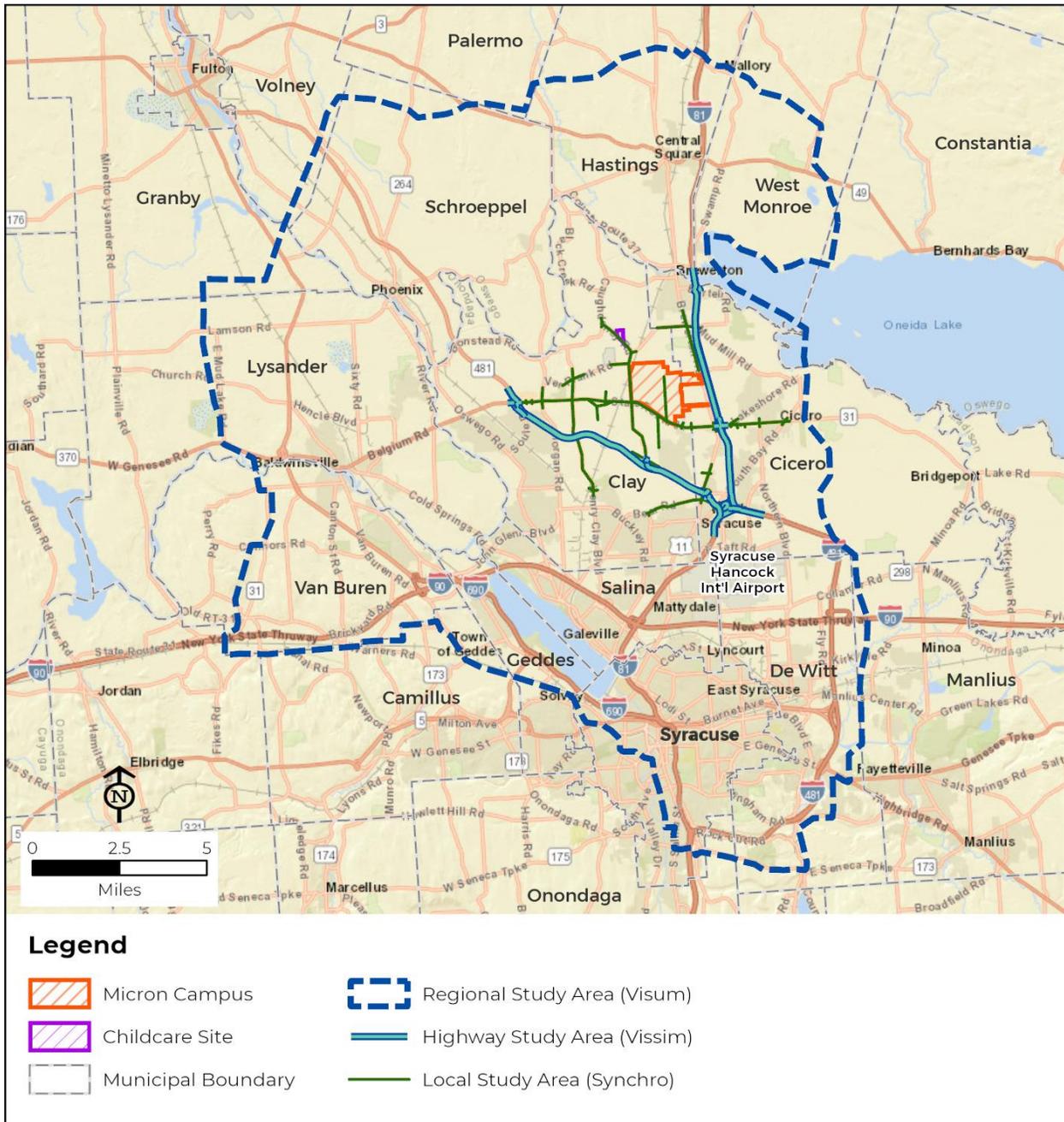
It is expected that traffic due to the Proposed Project, which includes construction workers, Micron employees, and community jobs induced by the Proposed Project, will be distributed throughout Onondaga County and beyond. The DEIS will focus on the immediate area around the Proposed Project and will examine potentially impacted traffic areas through regional, highway, and local analyses. The regional analysis will focus on the broader transportation network links within a roughly 30-minute driving commute of the proposed Micron Campus because this is the area that is expected to experience the largest increases in traffic volume. Within this area, all major highways in the greater Syracuse area are represented, and it is expected that trips coming from a greater distance to the Micron Campus, including from the City of Syracuse would be captured along these major access roadways. Additionally, the area allows other major projects in the area, such as the modifications to Interstate 81 (I-81) to be considered in the analysis.

The highway and local analyses will focus on the major highways, interstates, and intersections within a five-mile radius of the proposed Micron Campus. A 5-mile radius was chosen as this captures the locations most likely to be impacted by the Proposed Project.

The analyzed highway area includes sections of New York State Route 481/Interstate 481 (NY 481/I-481) and I-81. The analyzed local area will include 42 intersections along NY 31, United States Route 11 (US 11), Caughdenoy Road, Verplank Road, and other local streets.

The study area extents of the regional, highway and local study areas described above are shown in Figure A-1.

FIGURE A-1 TRAFFIC STUDY AREA



AUTOMATIC TRAFFIC RECORDER (ATR) COUNTS

Continuous 24-hour, two-way Automatic Traffic Recorder (ATR) counts will be collected at 190 locations within the New York State Department of Transportation (NYSDOT) jurisdiction, collected at 65 locations within the Onondaga County Department of Transportation (OC DOT), and collected at 36 locations within the New York State Thruway Authority (NYSTA) jurisdiction, each for a total of 7 days. The ATR counts will be collected by a third-party vendor using traffic data collection cameras or pneumatic tubes. ATR volume data summaries will be summarized in 15-minute intervals by location. The proposed ATR count locations, for each jurisdiction, are shown in Figure A-2.

TURNING MOVEMENT COUNTS (TMC)

Turning Movement Counts (TMCs) will be collected at 25 signalized and 7 unsignalized intersections within the NYSDOT jurisdiction and at 3 signalized and 6 unsignalized intersections within the OC DOT jurisdiction. A high-resolution video technology will be used to record vehicle classification TMC counts and crosswalk pedestrian volumes for two 5-hour time periods. The classified TMC counts will be compiled on two representative mid-weekdays (Tuesday, Wednesday, or Thursday) during the ATR count period nearest their location. The time periods chosen for reduction will be subject to the ATR results but is currently anticipated to be 5AM to 10AM and 3PM to 8PM. The number of conflicting pedestrians and bicyclists will be counted simultaneously with vehicle turning movement counts. Traffic recorded in the TMCs will be sorted into four classifications: Autos, Buses (including non-articulated buses, articulated buses and jitneys), Medium Trucks, and Heavy Trucks. The proposed TMC count locations are provided in Figure A-3.

VEHICLE CLASSIFICATION COUNTS (VCC)

29 ATR locations have been identified within the NYSDOT jurisdiction and 4 ATR locations have been identified within the NYSTA jurisdiction for Vehicle Classification Counts (VCCs). VCC shall be collected to provide detailed vehicle classification data over a 24-hour period during one of the three representative mid-weekdays (Tuesday, Wednesday, or Thursday). The VCC volume data summary will be summarized by location in 15-minute intervals. Traffic recorded for the VCCs will be sorted into four vehicle classifications: Autos, Buses (which would include non-articulated buses, articulated buses and jitneys), Medium Trucks, and Heavy Trucks. The proposed VCC ATR count locations are provided in Figure A-4.

FIGURE A-3 TURNING MOVEMENT COUNT LOCATIONS

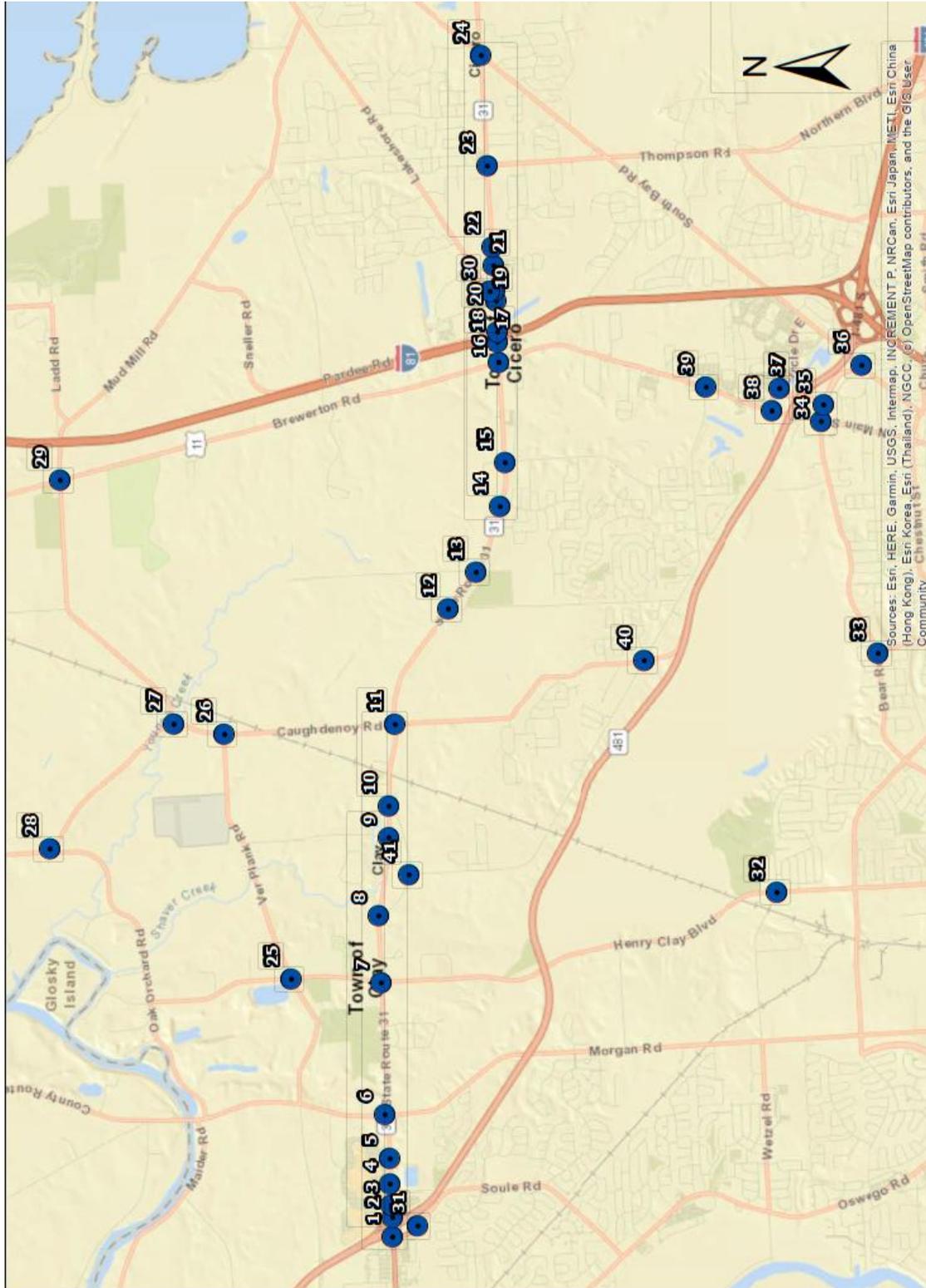
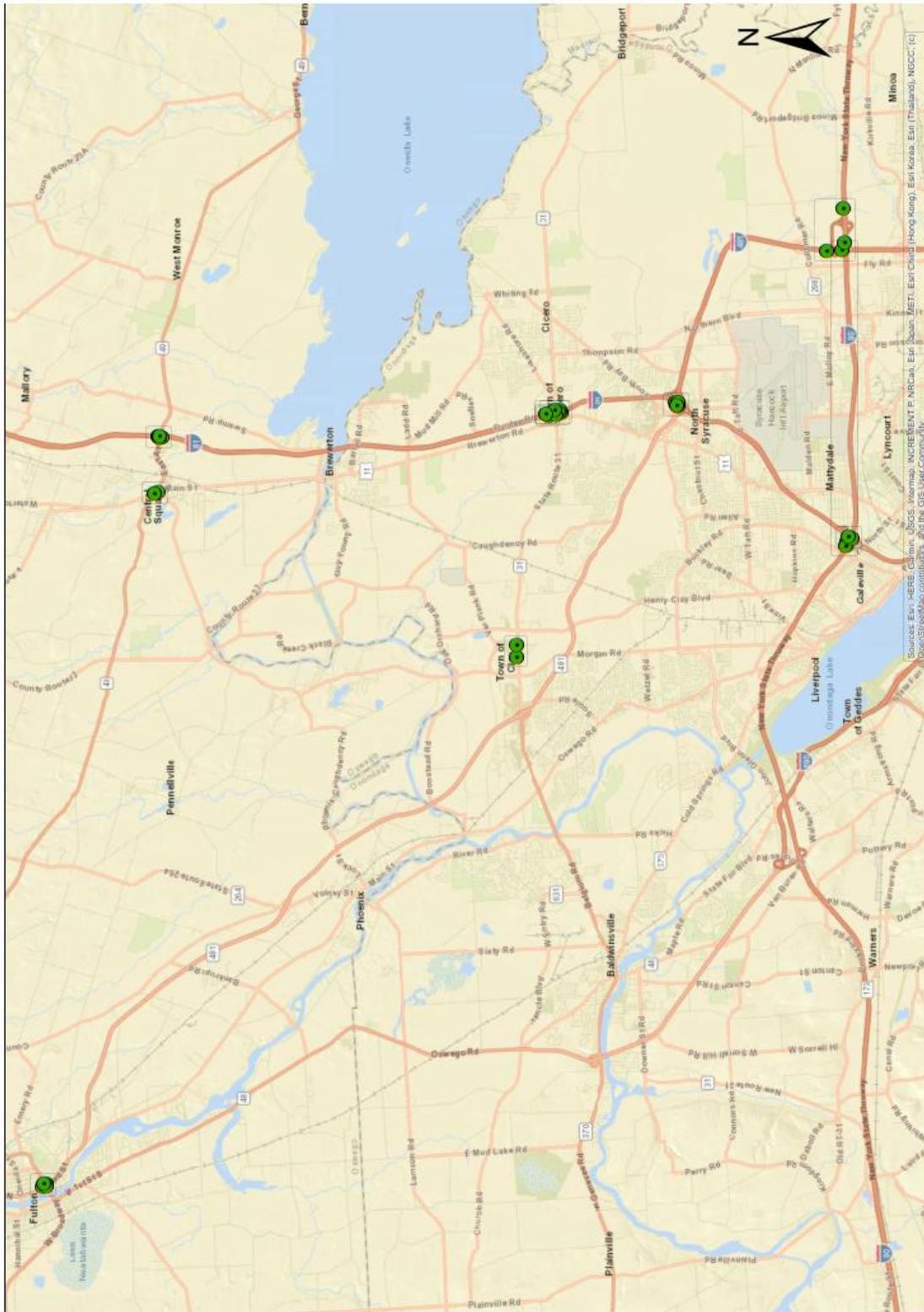


FIGURE A-4 VEHICLE CLASSIFICATION COUNT LOCATIONS



MICRON SEMICONDUCTOR FABRICATION
CLAY, NY

FINAL SEQRA SCOPE OF WORK

APPENDIX B:
RESPONSE TO COMMENTS

December 14, 2023

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A. Introduction

Micron New York Semiconductor Manufacturing LLC (Micron), a Delaware limited liability company (LLC) and wholly owned subsidiary of Micron Technology, Inc., is proposing to construct a semiconductor manufacturing campus (the “Micron Campus”) in the Town of Clay, New York, at the White Pine Commerce Park (WPCP), an approximately 1,400-acre industrial park controlled by the Onondaga County Industrial Development Agency (OCIDA). The Micron Campus, together with ancillary development on nearby properties, are referred to collectively as the “Proposed Project.” Off-site energy (natural gas and electricity), telecommunications, water, and wastewater utility improvements also will be required and are referred to as “off-site improvements” necessary for the Proposed Project. Rail spur improvements adjacent to the site are also considered off-site improvements.

After receipt of an Application for Financial Assistance from Micron, OCIDA circulated a notice of intent to serve as State Environmental Quality Review Act (SEQRA) (6 NYCRR Part 617) (New York Environmental Conservation Law §§8-0101 et seq.) Lead Agency on July 28, 2023. No objections to that notice were received during the 30-day period commencing on that date. At its regular meeting of September 14, 2023, OCIDA issued a Positive Declaration, indicating the need for an Environmental Impact Statement (EIS), and scheduled a public scoping meeting held on October 11, 2023. The Positive Declaration and notice of public scoping meeting was published in the Environmental Notice Bulletin on September 20, 2023. Notice of the public scoping meeting was placed in The Post Standard (Syracuse.com) – a newspaper of general circulation serving the broader Clay, New York area. Project information and a Draft SEQRA Scope were posted on OCIDA’s website (www.ongoved.com).

This document is an addendum to the Final SEQRA Scope. It identifies comments received through a public scoping process that ran from September 20, 2023, through October 31, 2023, including an in-person scoping meeting on October 11, 2023, at North Syracuse Junior High School.

Additional information on the Proposed Project and off-site improvements is contained in the Final SEQRA Scope.

B. Commenters on SEQRA Scope of Work

Individuals, elected officials, agencies, and organizations (“commenters”) were able to submit comments during the SEQRA scoping process in a variety of ways:

- Oral testimony was received during a public scoping meeting on October 11, 2023; and
- Written comments were received via mail and e-mail through October 31, 2023.

The list below identifies all commenters who submitted comments during the comment period. In some instances, commenters used more than one method for submitting comments.

All comment submittals (written and oral) were reviewed and substantive comments were allocated to comment categories. This document provides responses by comment category. When multiple commenters submitted similar comments, the similar comments were paraphrased and summarized in the respective comment categories, with effort taken to retain the substance and tone of the comments received. Each comment response includes a numbered cross-reference to the corresponding comment submittal(s). Attachment 1 is the full transcript of the public scoping meeting. Attachment 2 contains all written comments received during the public comment period.

AGENCY COMMENTS

- A. New York State Department of Environmental Conservation (NYSDEC) Region 7
- B. United States Fish & Wildlife (USFWS)
- C. Onondaga County Legislator Charles Garland
- D. Town of Clay Supervisor Damien Ulatowski

ORAL TESTIMONY AT PUBLIC SCOPING MEETING

1. Frank Sciortino
2. Jay Riordan | Cicero Democratic Committee and candidate for Town Council
3. Donald Hughes | Sierra Club
4. John Przepiora | Greening USA, Inc.
5. Mary Scanlon
6. Diana Elliott
7. Jim Nistico
8. Denise Androvette | Sierra Club member
9. Debra DeSocio | Sierra Club member
10. Peter Wirth | Climate Change Awareness and Action
11. Brian Heffron

WRITTEN PUBLIC COMMENTS

12. Frank Sciortino

13. Debra DeSocio | Central and Northern NY Sierra Club
14. Steve Erwin | Trucking Association of New York
15. Nathan Gunn
16. Minchin G Lewis
17. Audrey Fletcher
18. Paul Goldsman
19. Onondaga Audubon
20. Peter Wirth
21. Jill Shultz
22. Mary Lou Bender
23. Craig Polhamus
24. Richard Ellenbogen | Allied Converters, Inc.
25. Roger Caiazza
26. Michelle Fanelli
27. Brian Cocca
28. Center for Public Environmental Oversight
29. Sara Pieklik
30. CNY Sustainability Coalition
31. Sierra Club
32. Michael Wolfson
33. Frank Fowler
34. Jim Baker
35. Steve Strauss | Empire State Passengers Association¹

¹ Although this comment was received late, it was still considered by OCIDA and addressed in this Response to Comments.

C. Response to Agency Comments

New York State Department of Environmental Conservation (NYSDEC)

NYSDEC Comment 1: The DEIS should include a separate chapter addressing stormwater management which should include an evaluation of stormwater runoff (industrial and construction) and water quality. This section should identify the current requirements of NYSDEC's State Pollutant Discharge Elimination System (SPDES) Permits, including the Construction General Permit (GP-0-20-001) and Multi-Sector General Permit (GP-0-23-001), and also evaluate how these requirements will be met. Sufficient information should be developed to identify the approximate size and location of necessary stormwater management measures and outfalls during and after construction.

Response: Although stormwater impacts and management will be evaluated in the DEIS, it will not be in a separate chapter but will be included in the water resources chapter as part of the assessment of the Proposed Project's impact on surface waters. The Scope indicates that a Stormwater Pollution Prevention Plan (SWPPP) will be prepared for the Proposed Project and described in the DEIS (it will also be included as an appendix).

NYSDEC Comment 2: Due to the scale of the project and the anticipated need to have large areas of soil exposed at any given time, the DEIS should evaluate the soil characteristics that may cause or contribute to erosion on site. A reference should be developed to identify any supporting information or reports that will be included as an appendix. The Stormwater Pollution Prevention Plan (SWPPP) needs to address hydraulic changes pre- and post-construction, and all changes to hydrology from filling in any wetlands, streams, and drainage ways on site. It is important to note that while NYSDEC's Region 7 Division of Water and the Town of Clay will jointly evaluate the required SWPPP prepared by the Applicant, responsibility for the approval of the SWPPP lies with the Town of Clay as per the municipal separate stormwater sewer systems (MS4) General Permit (currently GP 0-15-003).

Response: The SWPPP will be prepared pursuant to the New York State Stormwater Management Design Manual (SMDM) and included in Micron's site plan application to the Town of Clay. Any soil characteristics that may cause or contribute to erosion will be identified in the SWPPP. Measures to protect against erosion during construction will also be identified in the SWPPP.

NYSDEC Comment 3: Stormwater management should pay particular attention to Chapter 3 of the New York State Stormwater Management Design Manual (SMDM) and its focus on Stormwater Management Planning. The SMDM requires a specific planning process when addressing stormwater management on a project site and guides the planner through steps to maintain pre-development natural hydrologic conditions of the site by application of environmentally sound development principles, such as green infrastructure, as well as treatment and control of runoff discharges from the site.

Response: Comment noted.

NYSDEC Comment 4: Identify additional potential development alternatives considering design and configuration changes to avoid or minimize potential impacts to wetlands, streams, and other sensitive natural resources. The area east of Burnett [sic] Road contains a large, forested wetland complex and portions of Youngs Creek; additional consideration should be given to avoiding development in this area.

Response: The Scope has been revised to indicate that the DEIS will consider two additional alternatives: 1) an alternative that evaluates the Proposed Project without access to and from US Route 11; and 2) an alternative that evaluates different internal configurations of Micron's proposed Fabs to determine to what extent impacts to wetlands, streams, and other natural resources on the Micron Campus can be avoided or minimized.

NYSDEC Comment 5: The DEIS should include a discussion of potential alternatives and mitigation that could reduce energy and fuel demands during construction and the long-term operation of the facility, including renewable energy sources.

Response: The Scope has been revised to indicate that the DEIS will include a summary of other alternatives previously considered but determined not to be feasible, including an alternative that relies exclusively on alternative sources of energy (beyond use of renewable energy for purchased electricity). The DEIS will also assess the proposed use and conservation of energy (including provisions for renewable energy sources). The DEIS will include an evaluation of energy impacts from construction and long-term operation of the facility, along with potential mitigation of those impacts.

NYSDEC Comment 6: Natural resource impacts associated with off-site infrastructure improvements (linear utility construction projects, pump stations, water intake and associated improvements, wastewater plant) should be evaluated and described in the DEIS, including the presence of, and impacts to, wetlands, waterbodies, and threatened and endangered species for. Horizontal drilling should be discussed and considered.

Response: The Scope has been revised to clarify that the DEIS will include an assessment of off-site improvements in each of the relevant subject areas, including natural resources. Proposed mitigation methods will be discussed.

NYSDEC Comment 7: The DEIS should include a table summarizing the amounts and types of wetlands, streams, and other waterbodies on the Proposed Project site, and those associated with the previous comment. The table should also quantify the impacts on these resources for phases 1 and 2, and the cumulative of both phases.

Response: Comment noted.

NYSDEC Comment 8: The DEIS should include a complete discussion on the avoidance and minimization of wetlands impacts, which are the first two analyses required prior to considering

wetland mitigation under implementing regulatory programs for Section 404 of the Clean Water Act and Article 24 of the New York State Environmental Conservation Law.

Response: The Scope has been revised to indicate that the DEIS will consider an alternative that evaluates different internal configurations of Micron's proposed Fabs to determine to what extent impacts to wetlands, streams, and other natural resources on the Micron Campus can be avoided or minimized.

NYSDEC Comment 9: The DEIS should include and discuss wetland creation and restoration prior to consideration of enhancement. Please see attachment B, which discusses DEC wetland mitigation requirements. This information should be discussed in the DEIS.

Response: The Scope has been revised to note that creation and restoration of wetlands would be considered prior to consideration of enhancement.

NYSDEC Comment 10: The DEIS should include the Proposed Project's onsite wetland delineation and compensatory mitigation package being developed by Micron and its consultants.

Response: The Scope has been revised to indicate that the wetland delineation report and draft conceptual compensatory mitigation plan will be included as an appendix to the DEIS.

NYSDEC Comment 11: The DEIS should address and discuss stream mitigation that will be completed to offset impacts to waterbodies on the Proposed Project site.

Response: The Scope has been revised to clarify that potential impacts (and any required mitigation) to streams will be assessed as part of the water resources assessment.

NYSDEC Comment 12: The DEIS should include an assessment of the functions and benefits of all the streams and wetlands on the Proposed Project site.

Response: The Scope has been revised to indicate that the DEIS will include an assessment of wetland functions and services.

NYSDEC Comment 13: The Acoustic Bat Survey Report and the Grassland Breeding Bird Survey Report, prepared for Micron New York by AKRF Inc. should be discussed and appended to the DEIS. The DEIS should reference Grass Land Bird Mitigation Requirements (attachment to comment letter)

Response: The Scope has been revised to indicate that the field reports for work conducted in Spring 2023 on bat habitat and grassland birds will be included as appendices to the DEIS.

NYSDEC Comment 14: The natural resource analysis of the Proposed Project should also include details on wildlife that likely use the site based on habitat types and any ancillary observations made by on-site natural resource consultants. The DEIS should discuss the impacts on the species associated with converting these habitats to an industrial site.

Response: The Scope indicates that the DEIS will include discussion of natural resources, including wildlife habitats, potential impacts and proposed mitigation.

NYSDEC Comment 15: The C-Class Youngs Creek (Water Index Number ONT-66-11-14), located east of Burnett [sic] Road, is continuously connected to the Oneida River (Water Index Number ONT-66-11) with no known impassable barrier. The site plan OCIDA included with the draft scope shows portions of the Proposed Project filling Youngs Creek. The DEIS should include information on any portions of Youngs Creek being filled or "culverted" and discuss how water in the stream will be managed.

Response: The Scope has been revised to note that field studies describing physical, biological, and chemical characteristics of Youngs Creek will be conducted as part of the DEIS.

NYSDEC Comment 16: A biological survey of Youngs Creek on the Proposed Project site should be completed to assess fish species composition in this stream and detail the effects on these species associated with any impact on the stream. The analysis should consider upstream and downstream impacts, and evaluate upstream and downstream instream habitat enhancement projects to mitigate potential onsite impacts.

Response: The Scope has been revised to include a requirement for field studies to characterize aquatic wildlife within Youngs Creek.

NYSDEC Comment 17: The DEIS should include further details to identify how surface and subsurface water resources will be evaluated. It should address potential on-site and off-site flooding and impacts to surface and groundwater, and an evaluation of impacts on surface water volume, including streams, wetlands, and drainage ways, and groundwater elevations during and after construction. Impacts to groundwater levels, quantity, and quality from filling wetlands should be assessed, including a groundwater hydrologic and hydraulic analysis of the impacts of placing fill in watersheds contributing to the project area. Special consideration should be given to filling wetlands, drainage areas, Youngs Creek, and its tributaries, including unmapped streams, and evaluate how fill may affect the surface and subsurface water flow and drainage patterns in the area and surrounding properties. Consider factors such as increased surface runoff, potential water flow redirection, and impacts on nearby waterbodies or stormwater management systems. Portions of this information are also needed as part of the SWPPP review. Points for consideration in the hydrologic/hydraulic analysis were identified.

Response: The Scope has been revised to clarify that the DEIS will identify both surface and subsurface water resources and impacts to those resources, including from construction, and potential mitigation of those impacts. See also Responses to NYSDEC Comments 1, 15, 16.

NYSDEC Comment 18: The DEIS should discuss how drainage will be maintained and how potential flooding would be mitigated.

Response: The DEIS will include the requested discussion.

NYSDEC Comment 19: NYSDEC supports documenting floodplains and recommends re-evaluating and updating floodplain mapping for any significant grade changes.

Response: Comment noted.

NYSDEC Comment 20: Dewatering of groundwater during construction should be discussed including best management practices that may be employed to avoid and mitigate impacts to the resource.

Response: The DEIS will include the requested discussion.

NYSDEC Comment 21: Evaluate the impact potential population growth associated with this development will have on the management of solid waste and recyclables, as well as the anticipated amount of waste and recyclable material generated by Micron. Onondaga County law requires that waste generated within the County be disposed of at the Onondaga County Resource Recovery Waste to Energy Facility. Consider the existing waste management network's capacity, and ability to accept increased volumes associated with the Proposed Project, and the potential for population growth. If the evaluation includes an expansion of any waste or recycling facilities or the use of the Onondaga County landfill, approximate dates of the expansion(s) should be included that correspond with Micron's expected buildout.

Response: The Scope has been revised to indicate that the DEIS will address issues of solid waste generation from the Proposed Project, as well as plans by Onondaga County to manage solid waste and recyclables as a result of economic development related to the Proposed Project. The Scope has been revised to provide additional detail on how the capacity of the existing waste management network would be affected by the Proposed Project.

NYSDEC Comment 22: The DEIS should include a discussion of hazardous waste, listed in 6 NYCRR Part 371.4, that the Proposed Project may generate, including type of hazardous waste anticipated to be generated, approximate volumes, storage methods, disposal options, and how the facility will operate following hazardous waste regulations found at 6 NYCRR Part 370-373.

Response: The Scope has been revised to clarify that the DEIS will include a description of the generation, storage, and disposal of hazardous wastes identified in 6 NYCRR Part 371.4.

NYSDEC Comment 23: Mitigation considerations for solid waste should include an evaluation of processing methods and chemicals used in the manufacturing process to determine if alternative methods could reduce the generation of hazardous waste.

Response: See Responses to NYSDEC Comments 21 and 22.

NYSDEC Comment 24: The air quality modeling included in the DEIS should include an air quality impact evaluation or dispersion modeling analysis for a variety of emission sources including major sources, air toxic sources, and any sources that appear likely to contravene an applicable ambient air quality standard. NYSDEC developed the DAR-10 guidance document, NYSDEC Guidelines on Dispersion Modeling Procedures for Air Quality Impact Analysis. The applicant should submit a modeling protocol to DEC for approval prior to performing any dispersion modeling analyses.

Response: The Scope notes that a stationary source air pollution control permit for the new manufacturing facilities will be required. The air pollution control permit application will include evaluation of pollutants subject to the National Ambient Air Quality Standards (NAAQS), New York air toxic control and ambient air requirements, and a Climate Leadership and Community Protection Act (CLCPA) greenhouse gas evaluation. The Scope indicates that the DEIS will summarize these detailed air quality modeling and impact assessment analyses that will be prepared to support the air pollution control permitting process.

NYSDEC Comment 25: If the impact assessment includes a private, pre-construction, on-site air quality monitoring network, the plan will need prior NYSDEC approval. Guidance for the establishment, maintenance, and reporting requirements of private air monitoring networks can be found in DAR-2, 6 NYCRR Part 231-12.3 and Appendix B to 40 CFR Part 58.

Response: Comment noted.

NYSDEC Comment 26: If one or more applicable requirements or proposed compliance certification sections require the use of a continuous emissions monitoring (CEM) system, the analysis should develop and include a continuous emissions monitoring plan. The analysis should include applicable RACT/BACT/LAER demonstrations, as well as appropriate Emission Reduction Credit (ERCs) demonstrations and analysis.

Response: See Response to NYSDEC Comment 24.

NYSDEC Comment 27: The analysis should include, as applicable, a Toxic Impact Assessment and Environmental Rating Demonstration pursuant to the requirements of 6 NYCRR Part 212. DEC developed DAR-1: Guidelines for the Evaluation and Control of Ambient Air Contaminants Under Part 212.

Response: See Response to NYSDEC Comment 24.

NYSDEC Comment 28: NYSDEC recommends that a copy of the Air Title V permit application and supporting information be appended to the DEIS to the extent it is available.

Response: Information supporting the Air Title V permit application will be provided as an appendix to the DEIS.

NYSDEC Comment 29: The Proposed Project is subject to the mandates of the Climate Leadership and Community Protection Act (CLCPA) and therefore requires an analysis pursuant to Section 7(2) of CLCPA. Please see DEC Program Policy DAR-21 for guidance on preparing the CLCPA analysis.

Response: The DEIS will include an assessment of GHG emissions associated with the Proposed Project and will assess compliance with Section 7(2) of the CLCPA.

NYSDEC Comment 30: NYSDEC recommends evaluating and quantifying GHG and co-pollutants of mobile emissions sources during construction and when the plant is in operation. Additionally, alternatives and mitigation that reduce GHG and co-pollutants from mobile emission sources must be considered.

Response: The Scope indicates that the DEIS will assess the Proposed Project's potential emission of GHGs and the measures proposed to avoid, minimize, and mitigate any impacts.

NYSDEC Comment 31: Among other CLCPA requirements, the Proposed Project will result in an actual increase in greenhouse gas (GHG) emissions, including both direct and indirect GHG emissions. Therefore, the DEIS should include a discussion of the justification for the Proposed Project, along with the technical and economic feasibility of any alternatives or GHG mitigation measures to address the increase. Any such mitigation should take place at the New York facility or in the immediate area, rather than in other cities or out of state. NYSDEC offered examples of potential alternatives and mitigation measures.

Response: The Scope indicates that the DEIS will include an assessment of GHG emissions associated with the Proposed Project and will assess compliance with Section 7(2) of the CLCPA.

NYSDEC Comment 32: The discussion of natural resource impacts for constructing utility connections, such as clean water, wastewater, electric, gas, telecommunications, and roadway expansions should be referenced in the Utilities and Infrastructure section of the DEIS.

Response: The Scope has been revised to clarify that the DEIS will include assessment of all off-site improvements (water, wastewater, electricity, natural gas, telecommunications) in each of the relevant subject areas, including natural resources.

NYSDEC Comment 33: NYSDEC recommends developing a phasing plan, which coincides with Micron's incremental expansion, for the buildout and expansion of all utility upgrades required to meet the Proposed Project's anticipated demands. The phasing plan should include sewer extensions, pumping systems, new clean water source(s) and distribution systems, wastewater plant upgrades, and gas and electricity distribution infrastructure.

Response: The Scope indicates that the DEIS will describe the proposed phasing plan of off-site improvements required to meet the Proposed Project's anticipated demand.

NYSDEC Comment 34: The DEIS should also provide adequate information to demonstrate that all utility upgrades will be constructed, operational, and sufficient to accept waste from or provide service to the Proposed Project. Please see Attachment D, which lists the typical details DEC reviews for a sewer extension and force main approvals.

Response: See Response to NYSDEC Comment 33.

NYSDEC Comment 35: Provide adequate details on the Proposed Project's wastewater loading, flow, and discuss the on-site wastewater pretreatments.

Response: The Scope has been revised to indicate that the Project Description chapter of the DEIS will include additional description of Micron's proposed use and management of water and chemicals (including on-site pretreatment) and Micron's proposed generation and management of various waste streams and how best management practices will be implemented.

NYSDEC Comment 36: The DEIS should provide details on the design specification of the new lake water intake structure and intake screening and assess potential fish impingement mortality and entrainment, and additional measures, including specific equipment, to avoid and minimize fish impingement and entrainment.

Response: The DEIS will identify and describe required infrastructure improvements, including, to the extent known, information on the design, and potential impacts to environmental resources from construction of those improvements.

NYSDEC Comment 37: The DEIS should consider and include details and a summary of water conservation and reuse practices to mitigate water demands.

Response: The Scope has been revised to indicate that the Project Description chapter of the DEIS will include additional description of Micron's proposed use and management of water (including on-site pretreatment) and how best management practices will be implemented to conserve water usage.

NYSDEC Comment 38: The DEIS should include a summary of any investigated and considered alternative water sources.

Response: The Scope has been revised to indicate that the DEIS will describe any previous studies conducted by Onondaga County Water Authority on alternative sources of water.

NYSDEC Comment 39: Water withdrawals within the Great Lakes Basin are subject to the requirement and provisions of the Great Lakes-St. Lawrence River Basin Water Resource Compact. The DEIS should discuss and address how the proposed water withdrawal and use is consistent with the Compact and all state, local, and federal laws.

Response: In accordance with NYSDEC rules and guidance there is an exception for public water supply systems from the Great Lakes-St. Lawrence River Basin Water Resources Compact as enacted in ECL Article 21 Title 10. The DEIS will include discussion regarding water withdrawal, including applicable permits and regulations.

NYSDEC Comment 40: NYSDEC recommends renaming the DEIS chapter as “Use and Conservation of Energy.”

Response: The Scope has been revised to indicate that the chapter will be named “Use and Conservation of Energy.”

NYSDEC Comment 41: The DEIS should contain a description of energy sources to be used during both construction and operational phases of a project, including accurate estimates of demand or consumption. Discuss alternatives and mitigation that could reduce energy and fuel demands during construction and long-term operation.

Response: The DEIS will assess the Proposed Project’s energy requirements and will include a discussion of the use of alternative energy sources and energy conservation. If significant adverse impacts with regard to energy resources are identified, mitigation of such impacts will be identified.

NYSDEC Comment 42: The 2018 amendments to SEQR regulations require all New York State agencies to evaluate such GHG impacts in a new section specifically dedicated to climate change and its impacts. Proposed energy conservation measures that go beyond the minimum requirements of the State Energy Conservation Construction Code (9 NYCRR Parts 7810 through 7816) should be specifically identified, such as LEED or Energy Star. Please refer to Chapter 5, Section C, Item 44 on page 123 in the SEQR Handbook. The information and energy conservation measures discussed in this section may be applicable and cross-referenced to the Greenhouse Gas Emissions and Climate Change chapter.

Response: Comment noted.

United States Fish & Wildlife Services (USFWS)

USFWS Comment 1: Section five of the Scope provides general topics and specific technical studies proposed to inform the DEIS. We note that while the list of resources includes wetlands, floodplains, and vegetated habitat, there is no mention of an analysis of the project’s effects on wildlife. The Scope should be amended to include literature review and field observations of wildlife using the site at all times of the year, including winter and migration seasons. Potential impacts to wildlife that should be considered in the DEIS include, but are not limited to, noise, lighting, pollution, human activity and traffic. Potential loss of habitat and fragmentation appear to be substantial and will negatively affect many species. This information should be included in the Scope and documented in the DEIS.

Response: The Scope has been revised to divide the “Natural Resources” chapter into separate “Water Resources” and “Ecological Communities & Wildlife” chapters to

provide clarity regarding how water resources (groundwater, streams, and wetlands) and habitat for wildlife will be assessed in the DEIS. The DEIS will assess potential impacts on wildlife, including where appropriate, literature review and field observations collected seasonally, including winter and migration seasons. This assessment will evaluate potential impacts associated with noise, lighting, pollution, human activity and traffic as well as from the potential loss of habitat and fragmentation.

USFWS Comment 2: Regarding site vegetation, the Scope should include mapping of vegetation communities, surveys to document endemic plants and identification of rare species and communities as well as invasive plant species. Information should also be provided on the present and future threats of spreading invasive plants to and from the site. An invasive species management plan should be developed for the site in consultation with NYSDEC.

Response: The Scope has been revised to enhance the description of how the DEIS will address ecological communities and potential impacts of the Proposed Project. The DEIS will include mapping of vegetation communities, surveys to document endemic plants and identification of rare species and communities as well as invasive plant species. The DEIS will also assess present and future threats of spreading invasive plants to and from the site.

USFWS Comment 3: The information gathered using the Service's Information, Planning and Consultation (IPaC) system should be included in the DEIS along with a description of studies completed thus far. For example, the Service and the Micron team, along with staff from the NYSDEC, have discussed studies of two endangered bat species believed to be using the site.

Based on information in IPaC, the project is within the range of the federally listed endangered Indiana bat (*Myotis sodalis*) and the federally listed endangered northern long-eared bat (*Myotis septentrionalis*). Accordingly, Micron initiated acoustic surveys of these species at sample locations on the site. A summary of the survey results should be included in the DEIS. The documented call locations should be analyzed in regard to tree removal and habitat modification. This information should inform what the potential effects to these listed species may be and what, if any, measures could be implemented to mitigate adverse effects. The Service will continue to work with Micron and other partners in evaluating the project's effects on federally listed species. Since federal agencies will be funding, permitting and/or approving aspects of the project, section 7 consultation under the ESA will be required.

Response: The Scope has been revised to indicate that summaries of field studies will be included as an appendix to the DEIS. The Scope indicates that the USFWS IPaC system will be queried.

USFWS Comment 4: The Scope indicates that wetlands will be identified and delineated in consultation with the US Army Corps of Engineers. We understand that most of that field work has been completed. However, the Scope does not indicate if or how wetland functions and services will be evaluated and reported. This information is important in understanding the habitat and social values (flood flow attenuation, sediment and nutrient retention, pollution abatement, etc.) these

areas provide. Documentation in the DEIS is also important to understand what is being potentially lost from the project and what mitigation is required of Micron to replace these functions and services. In line with section 404 of the Clean Water Act, the project design must avoid, minimize, and mitigate potential impacts to aquatic resources to the greatest extent practicable. This review approach should be added to the Scope.

Response: The discussion of wetlands has been revised in the Scope to make clear that a discussion of wetland function and services will be included in the DEIS along with a discussion of Section 404 permitting factors.

USFWS Comment 5: Wetland mitigation is mentioned in the Scope as potentially occurring on and off site. While the extent of potential wetland impacts is not yet known, it appears to be a substantial amount based upon the extent of wetlands found on the 1400-acre site. Mitigation for unavoidable impacts should occur within the same watershed (as defined by the 8-digit hydrologic code) and be as close to the impacted wetlands as practicable. Micron has inquired about mitigation options including the purchase of credits at third party wetland mitigation banks or in-lieu fee sites. The Service does not support the complete purchase of available credits for the Micron project as that reduces the effectiveness of the mitigation program.

Response: Comment noted.

Onondaga County Legislator Garland

Comment 1: "I want to be sure that our collective efforts ensure a pathway out of poverty for all of the residents I represent."

Response: Comment noted.

Comment 2: Raised concerns about the potential for increased traffic on highways and roads in and around the project due to population growth and workforce commutes.

Response: In coordination with the New York State Department of Transportation (NYSDOT), Onondaga County, the Town of Clay, and the Town of Cicero, and as indicated in the Scope, the DEIS will include an assessment of traffic conditions at the regional and local levels. Input from the Syracuse Metropolitan Transportation Council (SMTC) is also being provided. The Scope has been revised to include additional detail on how the traffic and transportation study area has been defined through consultation with NYSDOT and SMTC and in recognition of modifications to I-81.

Comment 3: Raised safety concerns relative to increased traffic and questioned what improvements would be made.

Response: See Response to Legislator Garland Comment 2.

Comment 4: Questioned the study area for traffic and whether additional areas to the south should be included.

Response: See Response to Transportation Comments 1-2.

Comment 5: "How is traffic going to be addressed as the scoping of the project goes further and further and brings not only Micron employees to our -- to our boundaries, but also those support industries that are so vital to that operation and will be instrumental in the growth of our community."

Response: See Response to Growth Inducing Impacts 2.

Town of Clay

Comment 1: The DEIS should include the reason or purpose for the chimneys or stacks (163 ± ft), and the emissions associates with those stacks.

Response: The Scope indicates that the DEIS will include analysis of impacts associated with construction and operation of the facility, including visual impacts and air emissions impacts.

Comment 2: Safeguards should be established for the discharges into the rivers, including testing, to confirm the discharges are safe and not contaminating the receiving waters.

Response: Comment noted.

Comment 3: Assurances should be made regarding the safe conveyance of wastewater from the facility to the Oak Orchard treatment plant.

Response: Comment noted.

Comment 4: The DEIS should address not only the traffic impacts to the Town from Micron employees but also those from the support industries.

Response: The DEIS will include a full analysis of traffic impacts, including growth-inducing impacts.

D. Response to Public Comments

Purpose and Need

Comment 1: Many commenters expressed overall support of the Proposed Project and noted the many positive impacts, including economic impacts, it will have in the Town, County, region and State. (1, 14, 15 16, 17, 33, 34, 35)

Response: Comment noted.

Project Alternatives and Description of the Proposed Project

Comment 1: One commenter stated that “Micron, DEIS needs to greatly expand its range of alternatives.” (30)

Response: See Responses to NYSDEC Comments 4-5.

Comment 2: Comments asked why Micron needs to site the Proposed Project in Clay. (26)

Response: See Response to NYSDEC Comment 4. The Scope indicates that the DEIS section on alternatives will detail the analyses previously performed for the proposed location of the Proposed Project and other locations in New York State and Onondaga County.

Comment 3: Commenters suggest that the Draft Environmental Impact Statement should include an alternative to add a Combined Cycle generating plant on the Micron Property. (24, 25)

Response: See Response to NYSDEC Comment 5.

Comment 4: Comments requested a consideration of alternative energy sources, including the use of renewable energy. (3, 10, 13, 20, 21, 26, 29, 30, 31,)

Response: See Response to NYSDEC Comment 5.

Comment 5: “Careful attention must be paid to ensuring the energy at the plant will be fossil free.” (10)

Response: As outlined in the Scope, the DEIS will assess the Proposed Project’s energy needs, including its potential use of fossil free energy.

Land Use, Zoning, & Public Policy

Comment 1: The Sierra Club and CNY Sustainability Coalition commented “Why isn’t the city of Syracuse explicitly included here? Seems to be a major omission.” (30, 31)

Response: While changes to land use, zoning, and public policy within the City of Syracuse will be unlikely given the distance between the City of Syracuse and WPCP, the Scope indicates that the DEIS will address regional issues of economic activity and how that might affect land use within the surrounding area, including the City of Syracuse. See also response to *Other* Comment 11.

Community Facilities, Open Space & Recreation

Comment 1: A number of comments note that open space and the enjoyment of outdoor activities (e.g., birding) was important and should be preserved. Numerous studies have demonstrated the benefit to humans of having green spaces nearby. (19, 26, 29)

Response: The Scope indicates that the DEIS will consider potential direct and indirect impacts of the Proposed Project on parks and recreational resources as well as open space.

Comment 2: The Sierra Club and CNY Sustainability Coalition commented that "This section is poorly organized and deserves to be rewritten to define more clearly what are the parameters to be studied and analyzed relevant to police, fire and other emergency services; schools; parks and rec facilities. Absent from the community facilities most notably is the health care and hospital system." (30, 31)

Response: The Scope has been revised to provide greater clarity on the study areas that will be used for each of the technical areas of analysis, including for community facilities and services and parks and recreational resources. Because the technical areas are related to variable conditions, there will necessarily be a variety of study areas defined for each area. Note, however, that an assessment of impact on health care and the hospital system is not contemplated as it is beyond the scope of the environmental review of the Proposed Project.

Comment 3: "Onondaga County health care facilities, in particular our hospitals, were short-staffed even before the Coronavirus pandemic. Waiting times and bed shortages were unfortunately highlighted by Covid-19 cases and have continued. What improvements in the healthcare system are proposed to remedy these shortcomings in view of the expectation of potentially thousands of new residents to work at and/or serve the Micron plant." (32)

Response: See Response to Community Facilities, Open Space & Recreation Comment 2.

Socioeconomic Conditions

Comment 1: The public comments raised questions about the future workforce. (16, 26)

Response: Micron has been engaged in an extensive discussion with the Community Engagement Committee (CEC) (an entity convened by the Governor's Office, Micron, and local elected officials) on how the economic benefits of Micron's Proposed Project will be experienced within the broader community, including, but not limited to, the City of Syracuse. Micron has been working with regional stakeholders to identify and enhance workforce development programs in anticipation of the thousands of jobs that the Proposed Project will generate. The draft Scope included estimates of projected Micron employment and the general qualifications required for different categories of jobs. The Scope has been revised to include a new sub-heading for this text: "Proposed Project Employment."

Comment 2: Some comments requested a discussion of the anticipated impacts on property taxes. (1, 3, 5, 26,)

Response: SEQRA does not require consideration of purely economic impacts. Notwithstanding, the Scope indicates that the DEIS will consider changes in demographics and housing costs, changes in labor supply and effects on existing businesses, and municipal costs generated by the Proposed Project. As part of

this, anticipated impacts to municipal tax levies (the amount of the municipal budget derived from property taxes) will be qualitatively discussed.

Comment 3: How will the increase in this infrastructure expansion be covered financially? Will the local community be impacted financially due to the building of the pipeline to carry the water? How is the expense being covered? How much money will it take to pay for the whole building?" (26)

Response: This comment is outside the scope of SEQRA. Notwithstanding, the Scope indicates that the DEIS will consider changes in demographics and housing costs, changes in labor supply and effects on existing businesses, and municipal costs generated by the Proposed Project.

Comment 4: "What are the projected benefits for the local community? What does Micron have to offer the local community as they plan their environmental impact? How will the negative effects of this infrastructure affect me economically in the beginning and through to the future?" (26)

Response: The Scope indicates that the DEIS will describe Micron's projected benefits to the community as well as its efforts to work with community leaders through the CEC to consider how project benefits can be distributed throughout the affected communities, including to communities of color or low-income communities.

Comment 5: The benefits and adverse impacts of socioeconomics need to be considered together and the DEIS should specify the analytical standards, tools and techniques employed. (32, 35)

Response: The Scope indicates that potential adverse socioeconomic impacts will be assessed in the DEIS.

Environmental Justice

Comment 1: Comments raised concern that project-related traffic could potentially affect environmental justice areas and suggested that traffic data be collected from an expansive geographic, especially since the southwest side of the city which has been a concentration of historically disadvantaged populations. (16)

Response: The Scope indicates that the DEIS will include analysis of potential impacts on environmental justice communities and disadvantaged communities. See Response to Transportation Comment 1.

Comment 2: "There is a draft permitting requirement that should be considered in the Technical Studies section of the DEIS. The New York State Department of Environmental Conservation (DEC) recently proposed a new policy that will require an analysis of impacts on disadvantaged communities (DACs) as part of most environmental permitting actions." (25)

Response: Comment noted. Micron will consider applicable guidance in the DEIS.

Historic and Cultural Resources

Comment 1: One commenter noted the existence of properties located on Burnet Road and other parts of the White Pine site, some of which are eligible or potentially eligible for listing on the NY State Register of Historic Places and commented that these properties were supposed to be surveyed/assessed in conjunction with the NY State Historic Preservation Office. (18) One commenter suggested preservation of a house on the corner of Burnet and Route 31, and also preservation of a barn on the south side of Route 31. (34)

Response: The properties located on Burnet Road were studied as part of the SGEIS for the WPCP prepared in 2021 to establish a shovel ready commerce park. Any demolition of those properties is not part of the Proposed Project and was completed earlier this year for public safety purposes. The Scope indicates that coordination with the New York State Historic Preservation Office (SHPO) would be required for any additional properties not previously evaluated. In coordination with SHPO, and as indicated in the Scope, the DEIS will identify potential eligible or listed historic resources at WPCP or the surrounding area.

Visual Impacts & Community Character

Comment 1: Commenters raised concerns about visual impacts, including impacts associated with lighting. (19, 22)

Response: The Scope indicates that a visual impact assessment will be conducted consistent with NYSDEC Program Policy "Assessing and Mitigating Visual Impacts."

Comment 2: Concerns were raised about the Proposed Project's impact on community character and quality of life. (4, 24)

Response: The Scope indicates that potential impacts to community character will be addressed in the DEIS.

Comment 3: The Sierra Club and CNY Sustainability Coalition commented that "This project has the potential to significantly alter the character of the community—not only the locale surrounding the immediate project location, but the wider Syracuse and Onondaga County as well as portions of Oswego County as population growth and housing development is induced." (30, 31)

Response: See Response to Visual Impacts & Community Character Comment 2.

Geology, Soils, & Topography

Comment 1: "Reference is made to 'property survey' as a data source but later the 'geotechnical investigation' is mentioned but not included in the sentence describing the analysis. Is this an oversight that should be corrected? Certainly the geotechnical survey will provide valuable information to confirm or modify the USGS soil survey data." (30, 31)

Response: The Scope has been revised to clarify the information to be used in the geology, soils, and topography DEIS chapter.

Water Resources

Comment 1: Public comments related to consumption of water, water infrastructure, wastewater, and water quality. (2, 3, 5, 17, 26, 27, 28, 30, 32)

Response: The Scope has been revised to indicate that the DEIS will include additional description of Micron's proposed consumption of water and generation of wastewater and how those volumes will be minimized as well as managed and coordinated with County infrastructure.

Comment 2: The DEIS must describe the types and amounts of pollutants that will be discharged into the water. (27)

Response: See Response to Water Resources Comment 1.

Comment 3: The DEIS should evaluate ways in which water consumption can be minimized including options for recycling. (3, 32)

Response: See Response to Water Resources Comment 1.

Comment 4: The volume of water and the contents of wastewater including, but not limited to known hazardous waste products/chemicals must be identified, including, the various expected contents of the water must be specified, including hazardous materials, even if the weights and the volumes are not known. (27, 28, 32)

Response: See Response to Water Resources Comment 1.

Comment 5: Questions were raised about the industrial wastewater, including how it will be treated and monitored. (5, 28, 30, 31)

Response: See Response to Water Resources Comment 1.

Comment 6: Concerns were raised about the massive use of water and potential impacts to water resources. (2, 3, 26, 30, 31, 32)

Response: The Scope indicates that the DEIS will evaluate potential impacts to water resources.

Comment 7: The public must be assured that the public water drinking supply will never be compromised to accommodate water use by the Micron plant. (32)

Response: Comment noted.

Comment 8: Questions were posed regarding safeguards and monitoring for wastewater leaving the Micron facility. (5, 27, 28, 30, 31)

Response: The Scope indicates that the DEIS will discuss applicable permitting, monitoring, and reporting obligations associated with wastewater.

Ecological Communities and Wildlife

Comment 1: Public comments raised concerns of the potentials impacts to wildlife and habitat on and around the site, specifically to birds, butterflies and other animals native to the site. (19, 21, 22, 23, 26, 28, 29, 30, 31)

Response: The Scope indicates that potential adverse impacts to these natural resources will be addressed in the DEIS.

Comment 2: Native plants should be considered as part of mitigation plans instead of typical ornamentals. (19)

Response: The Scope indicates that the DEIS will consider use of native plants as mitigation where necessary and if appropriate.

Solid Waste

Comment 1: Public comments submitted raised questions about solid waste and the amount of materials that would be used at the site, and what the process would be to dispose of the waste. (3, 26, 28, 32,)

Response: The Scope indicates that the DEIS will evaluate solid waste generation from the Proposed Project, including proposed management, impacts to resources, as well as proposed mitigation strategies, including recycling to reduce waste stream volumes.

Hazardous Materials & Hazardous Waste

Comment 1: Public comments raised concerns about hazardous materials being transported to and from the site, along with how Micron plans to dispose of such materials. Comments mentioned the use of PFAS as it relates to the semiconductor industry more broadly. Comments requested more information about the use of PFAS and the potential effect on communities and the environment. Comments also expressed interest in further analysis as it relates to the materials that will be used at the site and how risks will be avoided or mitigated with respect to those materials. (3, 4, 9, 23, 26, 28, 32)

Response: See Response to NYSDEC Comment 22.

Comment 2: Comments requested that the DEIS identify any hazardous materials, including chemical or petroleum bulk storage that would be used towards transport or generated by the proposed project and measures to protect against releases to the environment. (4, 30, 31)

Response: See Response to NYSDEC Comment 22. The Scope has been revised to indicate that the Project Description in the DEIS must further illustrate Micron's intended use, management, and conservation of water, chemicals, and energy.

Transportation

Comment 1: A commenter provided that "The importance of I-81 is recognized for its impact in the draft scoping document. The majority of the Micron Campus is contained within the Town of Clay, Onondaga County, New York and is accessible from I-81 from an interchange with NYS Route 31 (see Figure 1). OCIDA deemed the Radisson Corporate Park as an unviable choice because it lacked . . . specific advantages such as the proximity to Interstates 81 and 481. The draft scoping document notes that the lack of "access to multi-modal transportation" is often a point of failure for most other sites. Changes to I-81 should be evaluated for potential adverse impacts on the Micron Development." (16)

Response: The Scope indicates that the DEIS, in coordination with the New York State Department of Transportation (NYSDOT), will evaluate regional and local traffic conditions. The assessment of potential future traffic conditions will include potential I-81 modifications. The Scope has been revised to include additional detail on how the traffic and transportation study area has been defined through consultation with NYSDOT and SMTC and in recognition of modifications to I-81.

Comment 2: Several additional public comments raised concerns about the potential for increased traffic on highways and roads in and around the project due to population growth and workforce commutes. Many commenters are concerned about impact to residents and listed areas directly around the Project Site, while others raised concerns about the regional traffic impact. (1, 2, 5, 7, 14, 15, 16, 17, 22, 26, 32)

Response: In coordination with NYSDOT, Onondaga County, the Town of Clay, and the Town of Cicero, and as indicated in the Scope, the DEIS will include an assessment of traffic conditions at the regional and local levels. Input from the Syracuse Metropolitan Transportation Council (SMTC) is also being provided. The Scope has been revised to include additional detail on how the traffic and transportation study area has been defined through consultation with NYSDOT and SMTC and in recognition of modifications to I-81. See also response to Legislator Garland Comment 2.

Comment 3: Many commenters requested that the DEIS analyze and provide details for the proposed traffic improvements. As part of this, certain potential traffic improvements were proposed to help alleviate the traffic of the current roads that exist now. (2, 8)

Response: The Scope indicates that the DEIS will identify proposed transportation improvements and provide a schedule for when the improvements would be required.

Comment 4: Comments raised safety concerns and questions about what improvements would be made. Many commenters are concerned about impact to residents and listed areas directly around

the Project Site, while others raised concerns about the regional traffic impact. (3, 5, 13, 15, 16, 17, 20, 28, 29, 30)

Response: See Response to Transportation Comments 1-3.

Comment 5: Traffic must be evaluated in the context of existing and proposed infrastructure. (16)

Response: See Response to Transportation Comments 1-3.

Comment 6: "Significant adverse impacts could result in the assessment of environmental impacts from traffic if Automatic Traffic Recorder (ATR) counts and Vehicle Classification Counts (VCC) data sites are not added to collect data from sites in the City of Syracuse." (16)

Response: See Response to Transportation Comments 1-2.

Comment 7: A question was raised regarding the proposed number of entrances to the campus as well as the traffic flow and routes for delivery trucks. (2, 5)

Response: Details of proposed access points and circulation routes for employee vehicles and delivery vehicles will be described in the DEIS.

Comment 8: Certain comments questioned the study area for traffic and whether additional areas to the south should be included. "There [are] no traffic counters utilized on I-481 at the NY Route 92/5 exchange nor in the City of Syracuse." (15, 16)

Response: See Response to Transportation Comments 1-2. The Scope has been revised to include additional detail on how the traffic and transportation study area has been defined through consultation with NYSDOT and SMTC and in recognition of modifications to I-81. The interchange of I-481 and NY Route 92/5 is included in the regional study area.

Comment 9: The Trucking Association of New York commented that "[w]hile the Micron project itself may not have a negative impact on our industry, the additional vehicle traffic will. Put that increased vehicular traffic on a poorly designed interstate, and the results will be disastrous for our industry." As additional context, the Trucking Association of New York attached its October 2021 comments on the I-81 Viaduct Project DEIS. (14)

Response: See Response to Transportation Comment 1.

Air Quality

Comment 1: Public comments mentioned air quality as it relates to operations at the Proposed Project Site along with the air quality implications due to increased traffic and potential hazardous material. These comments requested additional detail on proposed air emissions, including mobile source emissions, and requested that air quality impacts be evaluated in the context of the existing

and proposed infrastructure” and, “Air quality should be monitored at all the traffic locations.” (16, 17, 32, 36)

Response: See Response to NYSDEC Comment 24. The Scope indicates that the DEIS will include assessment of mobile source and stationary source emissions from the Proposed Project. Mobile source emissions are primarily generated from additional vehicular traffic during both construction and operations. Stationary source emissions are generated from operation of the proposed Fabs. The Scope notes that a stationary source air pollution control permit for the new manufacturing facilities will be required. The air pollution control permit application will include evaluation of pollutants subject to the National Ambient Air Quality Standards (NAAQS), New York air toxic control and ambient air requirements, and a Climate Leadership and Community Protection Act (CLCPA) greenhouse gas evaluation. The Scope indicates that the DEIS will summarize these detailed air quality modeling and impact assessment analyses that will be prepared to support the air pollution control permitting process.

Comment 2: The public must be informed now regarding the amounts and types of air pollutants released by current Micron industrial facilities and expected to be released/emitted by the proposed Clay plant. (32)

Response: See Response to NYSDEC Comment 24.

Comment 3: Micron should identify plans to notify first responders and public of any toxic air releases, and first responders should be provided in advance with training and equipment to respond safely to such releases. (28)

Response: Comment Noted.

Comment 4: Employees should be warned about the toxicity of gases used by the industry and trained to protect themselves from potential releases, both at low levels associated with chronic toxicity as well as higher levels with acute toxicity.” (28)

Response: Comment noted.

Greenhouse Gas Emissions and Climate Change

Comment 1: Public comments noted that the use of natural gas seems inconsistent with New York State’s Climate Leadership and Community Protection Act (CLPCA) greenhouse gas (GHG) reduction goals. (10, 20, 23)

Response: See Responses to NYSDEC Comments 29-31.

Comment 2: Members of the public provided comments about GHGs. (10, 20, 35)

Response: The Scope indicates that the DEIS will assess the Proposed Project's potential emission of GHGs and the measures proposed to avoid, minimize and mitigate any impacts.

Comment 3: "Semiconductors have a carbon problem. The public should be informed about the plan to prevent fluorocarbons from being introduced to our local air." (9)

Response: See Response to Greenhouse Gas and Climate Change Comments 1 and 2.

Comment 4: "Interested to learn about the impact of embodied carbon as well as operational carbon in both the Micron plant and the associated growth." (6)

Response: See Response to Greenhouse Gas and Climate Change Comments 1 and 2.

Comment 5: Methane is a much more potent greenhouse gas than CO2. (10)

Response: Comment noted.

Comment 6: "The current plans for powering the Micron facility in Clay, NY, while looking good on paper, will in fact increase emissions on energy used to supply the Micron facility... The reality is that Micron is going to be powered by Fossil Fuel Generation that is transmitted over long distances, very likely from out of state in Pennsylvania or Ohio that have generation carbon footprints far higher than those in NY State. As GHG emissions are not cognizant of political boundaries on a map, those emissions will end up affecting NY State residents." (14)

Response: Comment noted.

Comment 7: "There are also possibilities for using the CO2 emissions of the generating facility for agricultural purposes, further reducing the carbon footprint of the plant." (14)

Response: Comment noted.

Noise & Vibration

Comment 1: Several public comments referred to concerns about noise & vibration from construction and operation, including noise from increased traffic. (8, 19, 29)

Response: The Scope indicates that the DEIS will include assessment of noise and vibration generated by construction and operations of the Proposed Project, including from increased vehicular traffic.

Utilities and Infrastructure

Comment 1: One comment requests that the process for wastewater be described.

Response: The Scope indicates that the DEIS will describe the manner in which wastewater will be treated.

Comment 2: There needs to be better definition of the assessment of potential impacts on infrastructure (water, stormwater, sanitary sewer, electrical and telecommunications) will be assessed.

Response: The Scope indicates that the DEIS will include an assessment of potential adverse impacts on utilities and infrastructure due to demand associated with the Proposed Project.

Comment 3: The release of toxic contaminants through water pathways is one of the most serious threats of semiconductor productions. Releases of certain contaminants in wastewater could compromise the operations of the Oak Orchard Wastewater Treatment Plant, even undermining compliance with its discharge permit.

Response: The Scope indicates that the DEIS will include an assessment of impacts from wastewater discharges from the Proposed Project.

Comment 4: Industrial pre-treatment must be described in the DEIS and should include identification of identify ways to pre-treat hazardous chemicals, perhaps even reusing some, before comingling with other wastes. This is particularly important for PFAS, because in the future more PFAS compounds are likely to be subjected to enforceable environmental standards, many at very low concentrations." (18)

Response: The Scope indicates that the DEIS will include an assessment of impacts from wastewater discharges from the Proposed Project, and will include a description of industrial pretreatment at the Proposed Project.

Comment 5: The DEIS needs to address parameters such as system capacity, level of service changes, fiscal implications for the community and impacts on water bodies. (16)

Response: The Scope has been revised to indicate that the DEIS will include additional description of Micron's proposed consumption of water and generation of wastewater and how those volumes will be managed and coordinated with County infrastructure.

Comment 6: Impacts associated with the "natural gas main" that will be extended to the plant must be included in the DEIS. (30, 31)

Response: The Scope has been revised to clarify that the DEIS will include assessment of all off-site improvements (water, wastewater, electricity, natural gas, telecommunications) in each of the relevant subject areas.

Anticipated Use & Conservation of Energy

Comment 1: "It is imperative to reduce emissions through clean energy usage initiatives and energy conservation projects." (2,36)

Response: Comment noted.

Comment 2: One comment questioned the impact of the Proposed Project on their energy bill and whether the Proposed Project will strain the grid and cause blackouts. (16)

Response: The Scope has been revised to indicate that the DEIS will include additional description on Micron's proposed use and conservation of energy (including provisions for renewable energy sources).

Comment 3: Additional detail was requested on the anticipated energy needs of this project which were noted to be enormous. (20,23)

Response: The DEIS will describe the Proposed Project's energy needs.

Comment 4: "Electrical consumption is anticipated to be 16 billion kilowatt-hours of electricity per year, when fully built. (Phase 2, Envir. Assessment Form, Part 1, Section K) To put this in perspective, this is equivalent to all of the electricity consumed by the states of New Hampshire and Vermont, combined. The entire state of New York used 143 billion kWh of energy in 2022. Micron will increase demand in NY by 11%." (20,23)

Response: Comment noted.

Comment 5: Questions were raised regarding the type and source of energy to be used by the Proposed Project. (10, 11, 16, 22)

Response: See Response to Anticipated Use and Conservation of Energy Comment 2.

Comment 6: Commenters requested consideration of various sources of electricity, including those that are currently available, and whose which may become available as the plant is constructed.

Response: See Response to NYSDEC Comment 5; Response to Anticipated Use and Conservation of Energy Comment 2.

Comment 7: The DEIS must evaluate the ability of current power lines owned and operated by National Grid to deliver the required power. (30)

Response: See Response to Anticipated Use and Conservation of Energy Comment 2.

Comment 8: One commenter questioned whether Micron stated its goal "to achieve 100% renewable energy for existing U.S. operations by the end of 2025" applies to the proposed facility. (10)

Response: See Response to Anticipated Use and Conservation of Energy Comment 2.

Construction

Comment 1: Several public comments referred to concerns about construction, specifically the use of heavy duty equipment and expected constructed related vehicular trips. (1, 13, 24)

Response: The Scope indicates that the DEIS will include evaluation of traffic conditions and potential adverse impacts during the construction of the Proposed Project. Specific analysis of traffic and traffic-related air quality and noise during construction will be identified and assessed in the DEIS, including potential mitigation options to address any adverse impacts.

Permits

Comment 1: "The SEQRA review should list all anticipated permitting processes, with the anticipated schedule of public comment periods, and it should require public notification to interested parties of each permit application as it is submitted." (18)

Response: Section 6 of the Scope lists the Federal, State, and local agencies with which Micron would coordinate on the Proposed Project and a preliminary list of anticipated permits that would be required to construct and operate the Proposed Project. The status, and contents, of draft permit applications would be made available, as applicable, as appendices to the DEIS. When OCIDA releases the DEIS for public review, it will announce the schedule for public comment and notifications will be distributed in accordance with applicable rules and regulations.

A forecasted date for the commencement of construction will be included in the DEIS.

Cumulative Impacts

Comment 1: "The use of the word 'summarize' to describe the scope of this Chapter is insufficient. This Chapter must assess indirect and cumulative impacts of the proposed project for each of the technical areas included in the DEIS. If these effects are included elsewhere it may be appropriate to summarize them here. Let's be clear about exactly what is required to be included in the DEIS." (20, 23)

Response: The Scope has been revised to indicate that the "Cumulative Impacts" chapter will consider any significant adverse impacts resulting from the incremental impact of the Proposed Project when added to other past, present, and reasonably foreseeable future actions. Each of the technical areas of the DEIS will address direct and indirect effects of the Proposed Project and off-site improvements.

Growth Inducing Aspects

Comment 1: Onondaga Audubon commented on Housing & Development that "the region outside of the project's direct footprint will be modified in order to support influx of as many as 100,000 new residents. Zoning maps have already been changed to increase the amount of land available to be developed for housing." (21)

Response: Comment noted.

Comment 2: The DEIS should include an analysis of the potential for growth-induced changes in the community that this project will induce." (32, 35)

Response: The Scope indicates that the DEIS will include an assessment of potential growth-inducing effects of the Proposed Project. This assessment will evaluate projected growth in traffic as a result of new residential development and any noise or air quality impacts associated with that increase in traffic.

Comment 3: Commenters note that the Proposed Project will cause an increase in demand for new housing and questioned the necessary capacity as well as the potential environmental impacts. (19)

Response: The location of any development of new housing within the Central New York region in response to any demand generated by Micron employment is unknown at this time and outside of Micron's control. It is therefore beyond the scope of this environmental review. Notwithstanding, any such new development would be subject to local comprehensive planning policies and zoning laws and regulations and require separate approvals pursuant to those local laws, regulations, and policies. The Scope indicates that the DEIS will evaluate projected growth in traffic as a result of new residential development and any noise or air quality impacts associated with that increase in traffic. The Scope also indicates that the DEIS will evaluate potential indirect impacts to community facilities and services as a result of projected residential population growth (see above).

Comment 4: "This is going to affect the housing market, are there any plans in order to ease this transition or combat this? (28)

Response: See Response to Growth Inducing Comment 3.

Comment 5: "With new jobs and housing comes increased traffic and therefore noise and air pollution. What impact will this have on residents' health and how will it be mitigated?" (19, 27)

Response: See Response to Growth Inducing Comment 2.

Other

Comment 1: Many commenters asserted that the NYSDOT's environmental review of the I-81 project was inadequate and that similar mistakes should not be made for the Proposed Project. (14, 15, 16, 33)

Response: Comment noted. The I-81 project is a separate and distinct project.

Comment 2: "Onondaga County health care facilities, in particular our hospitals, were short-staffed even before the Coronavirus pandemic. Waiting times and bed shortages were unfortunately highlighted by Covid-19 cases and have continued. What improvements in the healthcare system are proposed to remedy these shortcomings in view of the expectation of potentially thousands of new residents to work at and/or serve the Micron plant." (36)

Response: An assessment of impact on health care and the hospital system is beyond the scope of the environmental review of the Proposed Project.

Comment 3: "Demand new housing have walkable community parks that exceed the WHO recommendation of green space per person, and demand current brownfield sites be the priority sites of new development." (29, 31)

Response: The specific development of new housing within the Central New York region in response to any demand generated by Micron employment is unknown at this time and outside of Micron's control. The Scope indicates that impacts from induced demand will be considered in the DEIS. .

Comment 4: "It just brought, and I sort of a thought to myself to make sure that the scope does consider and focus and put ample attention towards the rail line. I'm not sure if the current CSX line that is moving across 31 is a part of what would be an increase in that rail traffic because of -- if that movement happened with that grant and that played out in (unintelligible). But I just want to, you know, make sure that the scope looks at the rail lines and the impact of the rail service and of an increase in that surface as we move forward here in the future generation. Thank you." (12)

Response: The Scope has been revised to indicate that the DEIS will address the existing CSX rail line adjacent to WPCP and its potential use to support construction of the Proposed Project and reduce construction truck traffic. Potential air quality and noise impacts of additional rail traffic along the CSX rail line would also be considered in the DEIS.

Comment 5: The use of rail was encouraged to mitigate transportation impacts. (35)

Response: Comment noted.

Comment 6: Several comments raised concerns about transit options in the area and how those options would be addressed for workers and commuters who will be working at the site. Commenters also encouraged prioritizing bike, and pedestrian access to the site. (29, 31, 32)

Response: The Scope has been revised to indicate that the DEIS, in coordination with the Central New York Regional Transportation Authority (Centro), will identify potential adverse impacts to transit service caused by the Proposed Project and modifications and expansion to transit service that may be required to address those impact and address the need for such services caused by the Proposed Project.

Comment 7: "The only mitigation measures mentioned in this section are improvements to roadways. It is imperative that the utilization of public transportation, including mass transit by bus and light rail, be considered." (32)

Response: See Response to Other Comment 6.

Comment 8: It should be noted that the Community Grid Plan is subject to a court order requiring the need for additional diligence related to the Micron development among other factors." (17)

Response: See Response to Other Comment 1.

Comment 9: Some comments questioned the use of the terminology "100 percent renewable energy." (10, 11, 22)

Response: Comment noted.

Comment 10: News reports have indicated that Micron has not committed to the huge expense of building a second water supply system from Lake Ontario in order to serve its industrial needs. The taxpayers of Onondaga County should not pay for this water supply system. This new system amounts to a dedicated supply for the Clay Micron plant." (36)

Response: Comment noted.

Comment 11: The City of Syracuse should be considered an interested agency. (31, 32)

Response: The Scope has been revised to include the City of Syracuse as an interested agency.

Comment 12: The DEIS should include a chapter for Wastewater and Stormwater.

Response: See Response to NYSDEC Comment 1.

Comment 13: A detailed assessment of the expected numbers of cancers and other pollutant-related illnesses based on air emissions, water discharge, and hazardous solid waste from the plant must be identified as part of the DEIS. (24)

Response: The Scope has been revised to indicate that the DEIS will include an assessment of potential adverse health impacts associated with air emissions and the use and disposal of hazardous waste from the facility.

Comment 14: "Micron is to be commended for committing itself to a large degree of sustainability, but what is actually achievable?" (3)

Response: The Scope indicates that the DEIS will discuss sustainability measures that Micron intends to implement at its facility.

Appendix A-3
Summary of NEPA Scoping Comments

A-3 Summary of NEPA Scoping Comments

As noted in Section 1.3.2, a NEPA scoping period was held from March 5 to April 5, 2024, and a public scoping meeting was held on March 19, 2024. Commenters at the scoping meeting included Federal, State, and local agencies, non-government organizations, and members of the public. Overall, 113 commenters, including 102 individuals, provided input during the scoping period. As shown in Table A-2, a total of 438 individual comments were received across various categories. This section summarizes the comments received by category.

Table A-2 Summary of Scoping Comments by Category

Category	Comments
NEPA Process Generally	73
Land Use, Zoning, and Public Policy	9
Geology, Soils, and Topography	13
Water Resources	99
Biological Resources	43
Historic and Cultural Resources	7
Air Quality	21
Greenhouse Gases and Climate Change	12
Solid Waste, Hazardous Waste, and Hazardous Materials	21
Human Health and Safety	14
Utilities and Supporting Infrastructure	22
Transportation and Traffic	36
Noise and Vibration	8
Socioeconomic Conditions	32
Environmental Justice	2
Miscellaneous	26
Total	438

NEPA Process Generally

Seventy-three commenters provided comments on the NEPA process. USEPA suggested the use of the NEPAAssist tool to facilitate the environmental review process. Most commenters in this category requested that the EIS analyze all potential environmental effects. Some commenters requested additional consultation with local indigenous communities and nearby municipalities. Some commenters expressed concern about the lack of transparency in the semiconductor industry in general. One commenter stated that the current environmental process is sufficient. One commenter highlighted the importance of fully applying the guidance in CPO’s Programmatic Environmental Assessment for Modernization and Internal Expansion of Existing Semiconductor Fabrication Facilities under the CHIPS Incentives Program.

Three commenters provided comments on indirect and cumulative effects. USEPA recommended consideration of direct, indirect, and cumulative effects, analysis of effects of both the Proposed Project and other announced or planned projects in the area, analysis of effects on communities that may be experiencing existing pollution or health burdens.

Other commenters noted the existence of other projects within the vicinity of the Proposed Project, such as the Interstate 81 urban corridor redevelopment project, which required lengthy analysis of traffic modeling. These commenters suggested that the EIS include updated regional traffic and air pollution models, with detailed analysis of the Proposed Project's effects on traffic in Syracuse. Commenters also recommended the consideration of cumulative effects on sewers, water usage, power, emergency services, schools, roads, air quality, and water quality.

Seven commenters provided comments relating to alternatives to the Proposed Project. Some commenters suggested siting the proposed Micron Campus elsewhere to decrease potential environmental, community, and traffic impacts; one commenter recommended siting the Micron Campus in downtown Syracuse or at one of several unused remediated industrial sites with existing utilities and infrastructure. Some commenters suggested that the Micron Campus and alternatives include features such as permeable parking lots and ecological landscaping techniques to reduce potential effects on wildlife. One commenter suggested that alternatives only be partially implemented to reduce potential effects.

Twenty-seven commenters provided comments on mitigation measures and monitoring. These commenters highlighted the need for a comprehensive and transparent discussion on mitigation and monitoring measures in the EIS, particularly regarding potential effects relating to wetlands and traffic. Many commenters expressed concern that wetland mitigation measures may not be sufficient or could lead to adverse effects. Commenters stated that the scope of current plans for wetland mitigation should be expanded to include wetlands outside the immediate project area and that there is a potential for the wetland mitigation measures to adversely affect nearby landowners due to displaced water.

Many commenters requested that the government agencies reviewing the Proposed Project ensure that stated mitigation measures are fully planned and implemented prior to the commencement of construction. Some commenters stated there should be permitting and monitoring efforts to reduce the potential effects of environmental releases.

Three commenters requested accessible public meetings that members of the public could reasonably attend after normal working hours, accommodations for non-English speakers, and virtual attendance methods. Commenters requested assurances that Micron would fulfill commitments to provide financial assistance to the City of Syracuse to address poverty. Commenters also stated that agencies should recognize the public's right to know about Proposed Project effects, the permits it would require, and how and when comments could be made on the EIS. The commenters recommended that agencies publish a schedule of opportunities for public participation for permit processes associated with the Proposed Project.

Land Use, Zoning, and Public Policy

Nine commenters provided comments on land use. Some commenters expressed concerns that the Proposed Project area contains prime agricultural land and historic properties that would

be permanently impacted if the Proposed Project is implemented. Others indicated concern over the planned development of the land based on the potential environmental effects of filling wetlands and streams. Some commenters suggested increasing the amount of green space on the proposed Micron campus, while others suggested that Micron purchase land elsewhere that could be converted to green space as a land exchange. Some commenters also expressed concerns about potential effects on residentially zoned areas adjacent to the project area.

Geology, Soils, and Topography

Seven commenters provided comments on geology, topography, and soils. Commenters were generally concerned over potential pollution of the soil as a result of facility construction and operation, particularly related to heavy metals, PFAS, and other chemical contamination. One commenter expressed concerns about potential soil impacts due to excavation.

Six commenters provided comments on construction methods and impacts. Commenters recommended utilizing green construction practices whenever possible, including recycling of construction materials for both use and disposal, environmentally friendly landscaping, green infrastructure, and incorporation of energy-efficient technologies. Commenters requested that green construction include permeable pavement on all hardened surfaces because the facility would be built in a wetland area. Commenters further inquired if Micron would seek a SITES certification for sustainable landscapes, which would entail the creation of landscapes to help reduce water demand, conserve or restore natural resources, provide wildlife habitat, reduce energy consumption, and promote human health and wellbeing.

Commenters also expressed concern relating to the effects of construction processes and equipment on the site. Commenters stated that significant volumes of concrete may affect the water table, and that the drainage of the site should be considered. Commenters stated that there should be a construction plan to mitigate the potential effects of construction fill on the site's water table and drainage, and of construction vehicle traffic on surrounding residential areas.

Water Resources

Fifty-seven commenters provided comments on water resources, water quality, and flooding in and near the Proposed Project area. Commenters were broadly concerned with the potential for negative effects from facility wastewater, stormwater runoff, and potential leaks or spills on the water quality of water resources, including Oneida Lake, nearby streams, and other water bodies. Commenters expressed concerns about potential flooding due to water displaced by the facility from the filling of water bodies and runoff from impervious surfaces, such as parking lots. Commenters also expressed concerns about short- and long-term adverse effects on nearby residences, businesses, and agriculture from potential Proposed Project-induced flooding, including sedimentation, increased turbidity, and introduction of pollutants via runoff. Some commenters expressed concerns that filling of water bodies would potentially cause floodwater to enter their properties and damage their lands or structures, and some of those commenters provided personal or historical anecdotes of flooding on their properties.

Forty-two commenters submitted comments relating to wetlands in or near the Proposed Project area. Most of these commenters expressed general concern about and opposition to the filling of wetlands, particularly related to potential flooding of nearby properties, and the loss of

wildlife habitat, including for threatened and endangered species and migratory birds. Many commenters stated that wetlands are essentially irreplaceable and expressed concerns that compensatory mitigation for filled wetlands would not sufficiently replace them or the habitat and ecosystem services they provide. Many commenters also expressed concerns about the potential for pollutants to leach into wetlands outside of the Proposed Project area. Some commenters requested that the EIS analyze wetlands outside of the immediate vicinity of the Proposed Project area. One commenter indicated that USACE should not permit Micron to fill the proposed acreage of wetlands and should instead consider permitting fill of a substantially smaller acreage of wetlands.

Biological Resources

Forty-three commenters provided comments relating to biological resources, including threatened and endangered species, other terrestrial wildlife, migratory birds, and vegetation and habitat in and near the Proposed Project area. Many commenters expressed concerns about potential adverse effects on wildlife from noise and light pollution from construction and operation of the proposed Micron Campus. Several commenters expressed opposition to the amount of vegetation and wildlife habitat that would be cleared for construction.

A majority of these 43 commenters expressed concerns about potential effects on Indiana and northern long-eared bats from habitat loss that would be expected to occur within the Proposed Project area and vicinity. Some commenters expressed concerns about proposals to relocate bat populations. Additional commenters raised concerns about potential effects on protected bird species in the area. Other commenters expressed concerns that planned habitat mitigation measures would not be sufficient to protect threatened and endangered species or concerns with an overall lack of mitigation planning in general.

Commenters in this category generally also commented on potential effects on wildlife from the loss of wetland and grassland habitat. Commenters expressed concern that Micron's plan to minimize the effects on habitat would be inadequate and suggested that there should be a mitigation program to analyze the effects of construction in wetlands, including on adjacent uplands. Commenters also stated that Micron should engage in wildlife relocation efforts. Commenters stated that the loss of grassland habitat would affect the 11 species of grassland birds in New York State that require grasslands for breeding and wintering. One commenter noted that historic habitat degradation has had little impact on New York State's wildlife and expects the Proposed Project to have no significant effects on wildlife.

Additional comments related to other potential Proposed Project effects on wildlife from construction activities, noise and light pollution, wastewater, and water use. One commenter requested the preparation of studies of these effects, and effects from loss of open space and increased human activity within the proposed Micron Campus, on wildlife. Commenters also requested disclosure of effects of wastewater discharges and water intakes on shoreline vegetation, aquatic organisms, fish, and other lake-dependent wildlife.

Five comments expressed concerns about potential effects of wetlands and grasslands habitat removal on migratory birds. The commenters stated that wetlands and grasslands play a vital role in supporting birds during migration and expressed concerns about potential effects on migratory birds from facility light pollution and the risk of bird strikes once the buildings are

completed.

Historic and Cultural Resources

Seven commenters expressed concerns relating to potential effects on properties considered to have historic importance at or near the Proposed Project site, including a cemetery, older residences, and potential indigenous burial sites. Other commenters expressed concerns about potential effects on local indigenous communities, particularly the Onondaga Nation and the Oneida Indian Nation, from potential pollution of Onondaga Lake and other culturally significant water bodies in and near the Proposed Project area. Some commenters also expressed concern that the Onondaga Nation and the Oneida Indian Nation did not attend the public scoping meeting and requested that Micron invite their views and input on the Proposed Project.

Air Quality

Twenty-one commenters expressed concerns about potential air pollution from facility chemical use (including PFAS) and incineration, and from increased traffic. Commenters stated that there should be careful monitoring and regulation of air emissions associated with the Proposed Project. Commenters requested the use of modeling to estimate potential air emissions from the proposed Micron Campus and from Proposed Project-related traffic, and that these estimates be made publicly available. One commenter requested that USACE develop a more comprehensive action plan to mitigate air pollution.

Greenhouse Gases and Climate Change

Twelve commenters provided comments on GHGs and climate change. Some commenters expressed general concerns about potential individual and cumulative effects from the Proposed Project on climate change. Commenters expressed concerns about potential effects on climate change from chemical and gas releases and a large projected water consumption rate. Some commenters stated that there should be more discussion of the GHG emissions mitigation technology that Micron plans to use, including for fluorinated gases. Several commenters requested that Micron implement green energy solutions to mitigate the Proposed Project's potential contributions to climate change, such as on-site renewable energy generation by solar or geothermal power.

Solid Waste, Hazardous Waste, and Hazardous Materials

Twenty-one commenters provided comments on chemicals, contaminants, toxics, and hazardous materials, including comments relating to PFAS. Commenters expressed concerns about potential environmental pollution from facility releases of chemicals from normal operation, hazardous waste, and waste disposal by incineration and wastewater. Commenters expressed concerns about regulatory oversight of the semiconductor industry given the range of toxic chemicals it uses. Some commenters stated that there should be a comprehensive waste management plan addressing potential worker or public chemical exposure. One commenter requested assurances that herbicides or insecticides would not be used on the proposed Micron Campus. One commenter suggested that municipalities included in the traffic study should be notified of vehicles that would transport hazardous chemicals or waste within their boundaries.

Some commenters expressed concerns about the potential use of PFAS on the proposed Micron Campus, including concerns that potential release routes for PFAS could include accidental spills during transport or handling of PFAS-containing products, incomplete combustion of PFAS during process controls on gaseous emissions, or inadequate wastewater treatment. Commenters expressed concerns that current wastewater treatment technologies would not adequately remove all PFAS, particularly short-chain compounds used in semiconductor production. The commenters requested that the EIS identify potential mitigation measures or research objectives relating to industrial wastewater. These commenters also expressed concern that current State and Federal regulations only cover two types of PFAS that have been phased out by the semiconductor industry. Other comments expressed general concerns about the longevity of PFAS once they are released to the environment and their potential adverse effects on the human and natural environment.

Human Health and Safety

Fourteen commenters provided comments on public and worker health and safety. Commenters expressed concerns about the potential for public and worker exposure to toxic chemicals, including PFAS, via air, water, and soil pollution and short- and long-term health effects from potential chemical exposure, including at a nearby school. Some commenters also expressed concerns about fair labor practices in the context of potential worker exposure to hazardous chemicals. Some commenters expressed concerns about potential terrorist acts on the Micron Campus based on its national value and proximity to New York City and stated that these factors could pose risks to public safety. Commenters suggested that employees should be trained in the potential toxicity of gases and management of potential releases. Commenters stated that additional risk management should include the planned use and storage of hazardous substances based on proximity and wind direction. One commenter recommended that Micron create Risk Management Plans for the notification of the public and first responders.

Utilities

Twenty-two commenters provided comments on utilities. Many commenters expressed concerns about the funding sources or use of tax dollars for new utility connections for the proposed Micron Campus. Commenters also expressed concerns about the size of the proposed Micron Campus and its projected electricity and water demands, and the ability of the existing utility system to prevent potential blackouts and water shortages. One commenter inquired about the potential incorporation of combined heat and power into Micron Campus building designs.

Transportation and Traffic

Thirty-six commenters provided comments on transportation and traffic in and surrounding the Proposed Project area. Commenters generally expressed concerns about the potential for increased traffic congestion as a result of the Proposed Project and additional residential and commercial development. Some commenters stated that increased traffic could result in potential air quality and noise effects. Some commenters requested the completion of additional traffic studies, particularly relating to air quality or the delivery of construction material to the Proposed Project site. One commenter expressed concern about the ability of emergency vehicles (e.g., fire engines) to travel efficiently along Caughdenoy Road in the event of potential traffic congestion from the Proposed Project. Another commenter suggested that the EIS should thoroughly discuss

specific traffic mitigation measures. One commenter submitted an illustration proposing new road construction.

Noise and Vibration

Eight commenters provided comments on noise (as well as other potential nuisances such as olfactory irritation and light pollution). Commenters expressed concerns about potential quality of life effects (e.g., sleep, traffic flow) and effects on wildlife (e.g., birds) from noise pollution from operation of the proposed Micron Campus. One commenter expressed concerns about potential noise pollution from lawncare equipment and recommended the implementation of ecological landscape techniques to reduce the amount of necessary lawncare. One commenter requested construction of a traffic noise barrier. One commenter stated that the current wastewater treatment plant has an extremely unpleasant odor. Another commenter expressed concerns about potential unpleasant odors from the completed Micron facility due to chemical releases. Two commenters expressed concerns that the Micron Campus would generate light pollution during operation and from associated traffic and stated that light pollution could also have adverse effects on the quality of human life.

Socioeconomic Conditions

Thirty-two commenters provided comments relating to socioeconomic conditions. Several commenters expressed support for the Proposed Project due to the projected boost to the local economy. Many commenters expressed concerns regarding housing affordability and availability in the areas surrounding the Proposed Project due to the projected influx of Micron employees and supporting staff. Some commenters expressed concerns about effects on quality of life in the areas surrounding the proposed Micron Campus relating to potential chemical, noise, and light pollution from the construction and operation of the facility. Some commenters expressed concerns about potential effects on the local economy from the construction of supporting facilities and residences. One commenter expressed concern that products manufactured at the Micron Campus would not be used in the United States, but would be shipped overseas, and that the Proposed Project would not result in the creation of jobs for existing local residents. One commenter suggested that Micron seek employees for the new facility from within the local area, particularly the City of Syracuse, based on the city's high rate of poverty and unemployment, particularly among minority groups. One commenter suggested that the EIS discuss potential effects on property taxes.

Two commenters expressed opposition to removal of residences and potential effects on properties considered to have historic importance. One commenter expressed concerns about where homeowners who would be asked to relocate would go and who would be responsible for providing new housing. One commenter described a personal experience with losing a historical property to eminent domain.

Environmental Justice

USEPA stated that communities with environmental justice concerns should be afforded the opportunity to provide input on the NEPA process, including proposed mitigation, and encouraged the use of the EJScreen tool to identify such communities. One commenter stated that the EIS must provide an unbiased and rigorous analysis of environmental effects, including effects relating to environmental justice, and encouraged the agencies to evaluate potential air quality,

climate change, water quality, and socioeconomic effects on communities with environmental justice concerns.

Miscellaneous

Twenty-six commenters raised other miscellaneous concerns:

- **Aesthetics and visual resources.** Commenters expressed concerns relating to potential effects on area aesthetics from facility construction and perceived undesirable visual elements, such as large sizes of buildings and supporting infrastructure on the proposed Micron Campus.
- **Recreation.** Three commenters stated that the EIS should consider potential effects on recreational resources in Upstate New York and the outdoor opportunities they provide. One commenter mentioned the value of Oneida Lake to fishermen and enthusiasts of boating, kayaking, sailing, swimming, and sightseeing, noting that these activities generate more than \$140 million in spending and additional tax revenue.
- **Comment deadline extension requests.** Four commenters requested an extension of the public scoping comment deadline to give the public more time to provide input.
- **Support for public scoping meeting.** One commenter expressed appreciation for USACE and Micron staff based on the public scoping meeting.
- **Education and community benefits.** One commenter expressed support for the Proposed Project based on projected education and community benefits, particularly as would be provided by the proposed Childcare Center.
- **Employment interest.** One commenter expressed support for the Proposed Project and interest in future employment at the Micron Campus.
- **Information requests.** Two commenters requested copies of public scoping meeting materials.
- **Mailing list requests.** Five commenters requested to be added to the EIS mailing list to receive updates on the NEPA process.
- **Media interview requests.** One commenter requested an interview with Micron regarding the Proposed Project.
- **Project longevity.** Several commenters expressed concerns about the longevity of the Micron fabs, and associated facilities based on potential further technology advancement during the Proposed Project's 16-year construction period.
- **Independent review.** Several commenters requested that government agencies conduct independent and thorough reviews of documents associated with the Proposed Project, including the EIS, traffic and air studies, and Proposed Project facility emergency and disaster management plans.

- **Sovereign Nations.** One commenter requested that the EIS describe the process and outcomes of consultation with sovereign nations and recommended that the EIS evaluate potential downstream effects on sovereign nations, sacred sites, and areas of religious or cultural significance. The commenter stated that CPO should ensure that the Proposed Project avoids or includes plans to mitigate effects on such sacred sites.

Compliance with Executive Order 14008. One commenter inquired about compliance with Section 216 of E.O. 14008, Tackling the Climate Crisis at Home and Abroad, which requires Federal agencies to recommend steps to achieve the goal of conserving at least 30 percent of U.S. lands and waters by 2030.

Appendix A-4 Notices



DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS BUFFALO DISTRICT
478 MAIN STREET
BUFFALO, NY 14202-3278

March 8, 2024

Regulatory Branch

**SUBJECT: Public Scoping for the Proposed Micron Semiconductor Fabrication Facility;
Department of Army No. LRB-2000-02198**

Mr. Robert M. Davies
Director, Office of Statewide Engineering
Federal Highway Administration
New York Division Office
11A Clinton Avenue, Suite 719
Albany, New York 12207

Dear Mr. Davies:

The U.S. Army Corps of Engineers (USACE), Buffalo District, has received an application for a Department of the Army (DA) permit (USACE number LRB–2000–02198) from Micron New York Semiconductor Manufacturing LLC (Micron), a wholly owned subsidiary of Micron Technology, Inc., to construct a semiconductor manufacturing facility for leading-edge manufacturing of dynamic random-access memory (DRAM) chips. The USACE, as the lead federal agency under the National Environmental Policy Act (NEPA), has determined the proposed project may significantly affect the quality of the human environment and filed a Notice of Intent to prepare an environmental impact statement (EIS) on March 5, 2024.

Micron is proposing to acquire the approximately 1400-acre White Pine Commerce Park site, located at 5171 Route 31, Clay, NY 13041, from the Onondaga County Industrial Development Agency (OCIDA), and to construct the semiconductor manufacturing facility over a continuous 20-year period. The Proposed Project consists of (1) construction of the Micron Campus, which will include four individual memory fabrication units (fabs), ancillary support facilities, driveways, and parking; (2) construction of a childcare and health care center located at 9100 Caughdenoy Road, Brewerton, NY; (3) construction of a connection to the National Grid substation, adjacent to the Micron Campus, and (4) a rail spur on the west side of Caughdenoy Road adjacent to the proposed facility. Micron intends to start construction of the Micron Campus in 2025, with two fabs (Fabs 1 and 2) becoming operational by 2029. Two more fabs (Fabs 3 and 4) would be operational by 2041. Separately, Onondaga County plans to improve the water supply and wastewater infrastructure to support operations of the manufacturing plant. The National Grid utility company plans to upgrade the energy infrastructure to support the Proposed Project. The Proposed Project is anticipated to involve placement of fill into a total of approximately 226 acres of federally regulated wetlands on the proposed Micron Campus, 18 acres on the Rail Spur property west of the proposed campus, and 7,523 linear feet of federally regulated streams and ditches. The applicant proposes to develop a compensatory wetland mitigation plan to offset permanent losses of waters of the United States from the Proposed Project.

Regulatory Branch

SUBJECT: Scoping Letter for the Proposed Micron Semiconductor Fabrication Facility;
Department of Army No. LRB-2000-02198

The National Institute of Standards and Technology's (NIST) CHIPS Program Office (CPO), the Federal Highway Administration (FHWA), and the U.S. Environmental Protection Agency (EPA) have agreed to participate as Cooperating Agencies pursuant to 40 CFR 1501.8.

One public scoping meeting on the Proposed Project will be conducted. The purpose of the meeting is to provide information regarding the Proposed Project, answer questions, and accept comments regarding the potential environmental impacts and effects to historic properties that may result from construction and operation of the Proposed Project. The public scoping meeting will be held on Tuesday March 19, 2024, 7 p.m. Eastern Time at the Town of Clay, Town Hall Board Room; 4401 Route 31; Clay, NY 13041. Agencies, organizations, and members of the general public are invited to present comments or suggestions with regard to the range of actions, alternatives, and potential impacts to be considered in the EIS.

The scoping period will continue for 30 days from the date of the Notice of Intent and will close on April 4, 2024. During the scoping period, the USACE invites federal, state, and local agencies, Tribal Nations, other interested parties, and the general public to participate in the scoping process. The purpose of the scoping process is to provide information to the public, serve as a mechanism to solicit agency and public input on alternatives, identify significant issues to be analyzed in the EIS, and ensure full and open participation in scoping for the draft EIS. USACE anticipates that potential impacts to land use; socioeconomic conditions; environmental justice communities; historic and cultural resources; visual impacts; geology, soils, and topography; water resources; biological resources; solid waste; hazardous materials; health and safety; transportation; air quality; greenhouse gas emissions and climate change; noise; and utilities and infrastructure will be analyzed in the EIS. All comments must include the USACE number LRB-2000-02198. In order to be accepted, email comments must originate from the author's email account. All comments received will become part of the administrative record and are subject to public release under the Freedom of Information Act, including any personally identifiable information such as names, phone numbers, and addresses.

Written comments regarding the proposed EIS scope should be submitted to: U.S. Army Corps of Engineers, Buffalo District, Attn: Ms. Margaret Crawford, 7413 County House Road, New York 13021. Individuals who would like to provide comments electronically should submit comments by email to: celrb-micron.public.comments@usace.army.mil.

Sincerely,

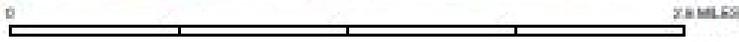
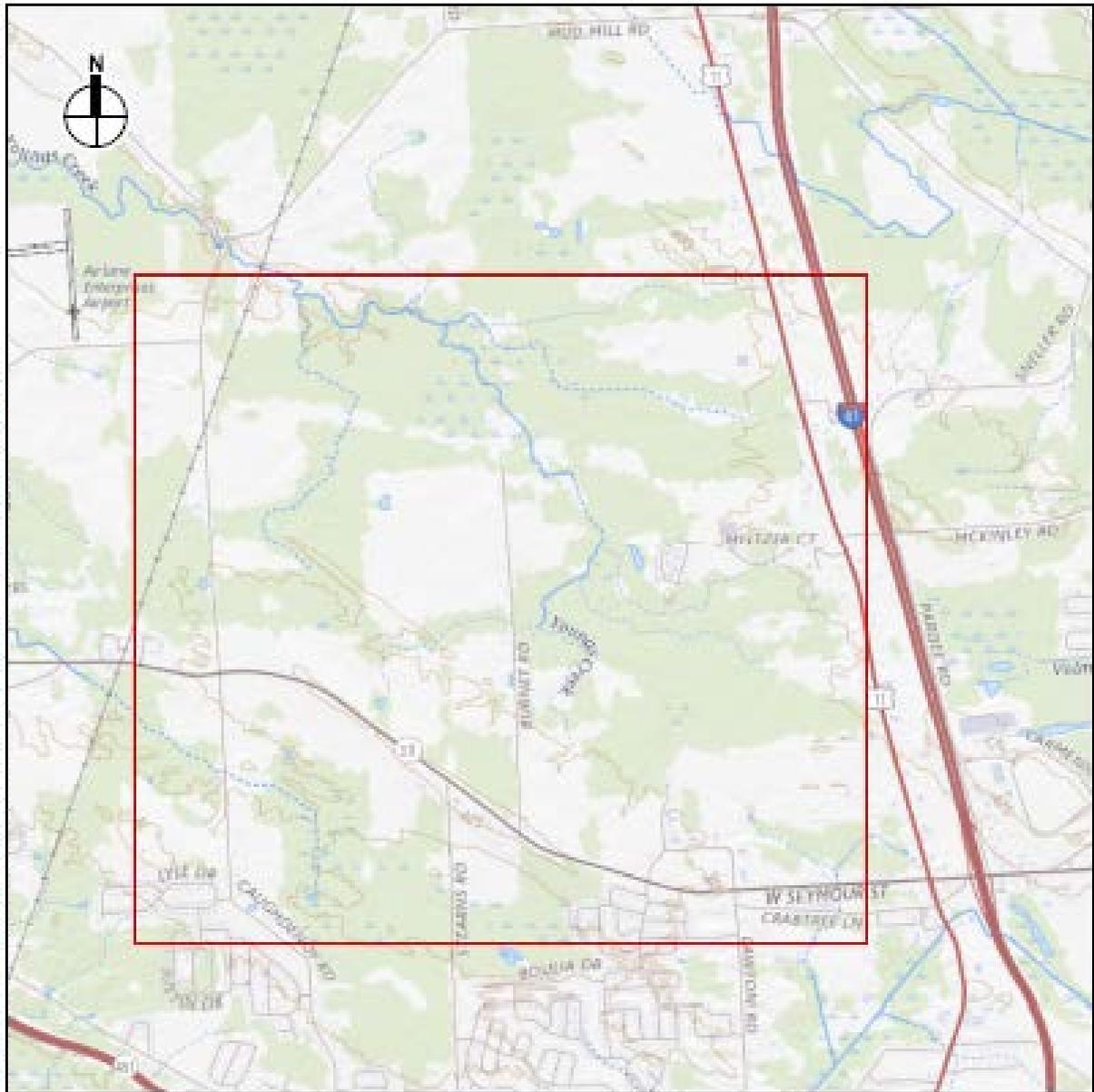
SIGNED

Steven V. Metivier
Chief, Regulatory Branch

Enclosures

8/13/20

Data source: USGS The National Map, <https://nationalmap.gov/imagery.html>, USGS Topographic Map Server



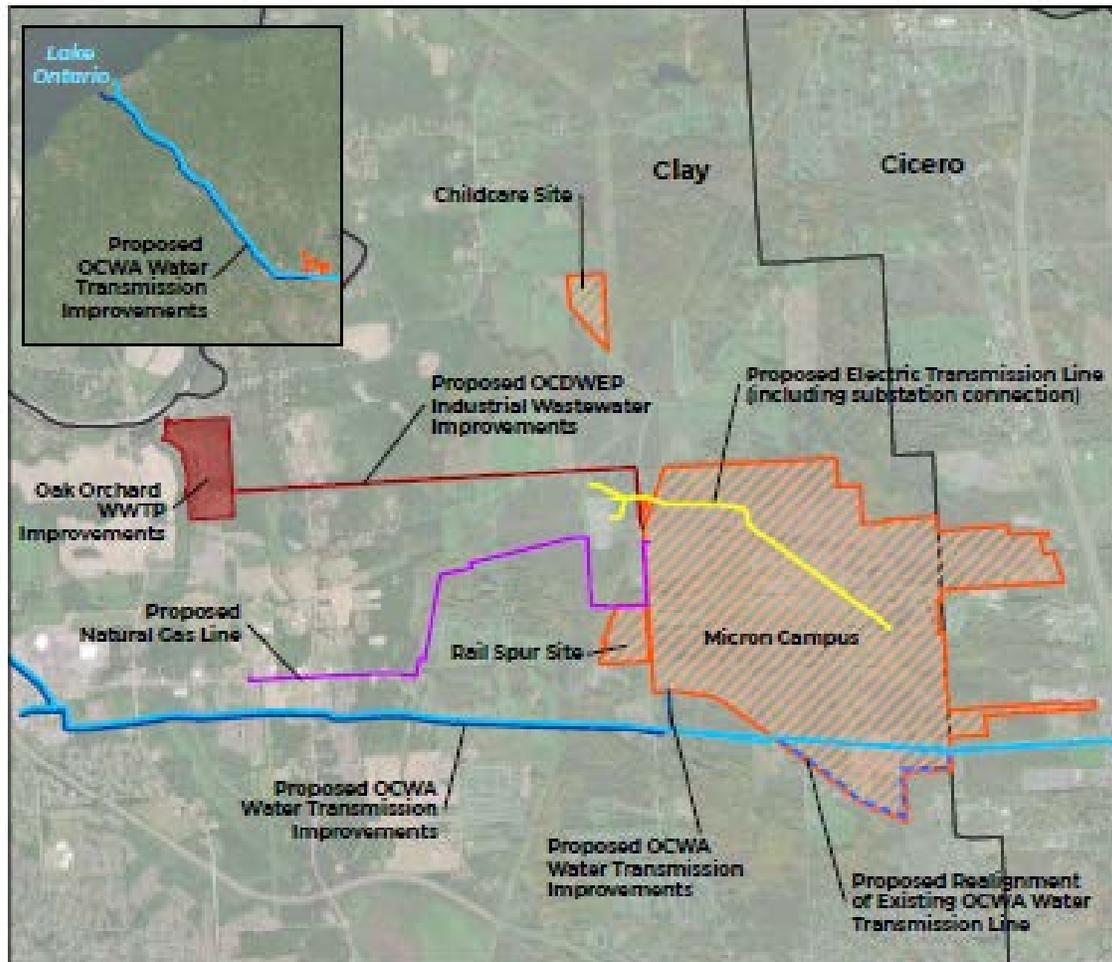
Approximate Project Area

Approximate coordinates of Project Site:
76°8'40"W 43°11'29"N



USGS Topographic Map – Brewerton and Cicero Quadrangles

Micron Semiconductor Manufacturing Facility Project, Clay, NY



Legend

— Existing OCWA Water Transmission Line

□ Municipal Boundary

Proposed Project (Micron)

-  - Micron Campus
-  - Childcare Site
-  - Rail Spur Site

Off-site Improvements (By Others)

-  - Proposed OCDWEP Industrial Wastewater Improvements
-  - Proposed Electric Transmission Line
-  - Proposed Natural Gas Line
-  - Proposed OCWA Water Transmission Improvements
-  - Proposed Realignment of Existing OCWA Water Transmission Line



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Feet

Coordinate System: NAD 1983 HARN StatePlane New York Central FIPS 5102 Feet
Projection: Transverse Mercator



DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS BUFFALO DISTRICT
478 MAIN STREET
BUFFALO, NY 14202-3278

March 8, 2024

Regulatory Branch

**SUBJECT: Public Scoping for the Proposed Micron Semiconductor Fabrication Facility;
Department of Army No. LRB-2000-02198**

Mr. Mark Austin
Environmental Review Team Lead
US Environmental Protection Agency
Region 2
290 Broadway Mail Code: 19TH FL
New York, New York 10007

Dear Mr. Austin:

The U.S. Army Corps of Engineers (USACE), Buffalo District, has received an application for a Department of the Army (DA) permit (USACE number LRB–2000–02198) from Micron New York Semiconductor Manufacturing LLC (Micron), a wholly owned subsidiary of Micron Technology, Inc., to construct a semiconductor manufacturing facility for leading-edge manufacturing of dynamic random-access memory (DRAM) chips. The USACE, as the lead federal agency under the National Environmental Policy Act (NEPA), has determined the proposed project may significantly affect the quality of the human environment and filed a Notice of Intent to prepare an environmental impact statement (EIS) on March 5, 2024.

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Department of Army No. LRB-2000-02198

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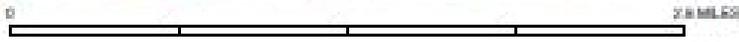
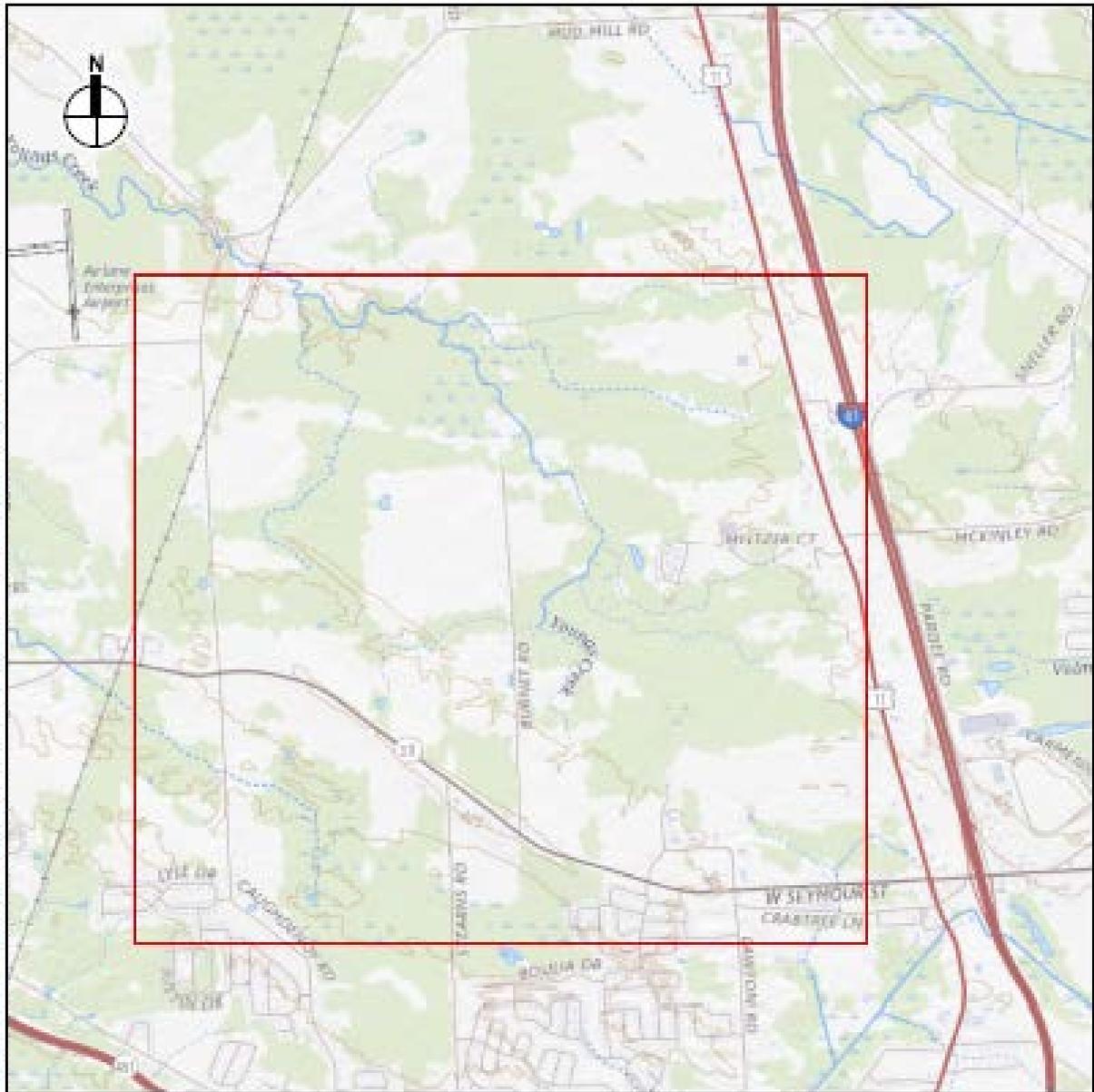
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Steven V. Metivier
Chief, Regulatory Branch

Enclosures

8/13/20

Data source: USGS The National Map, <https://nationalmap.gov/imagery.html>, © 2019 Google Maps Server



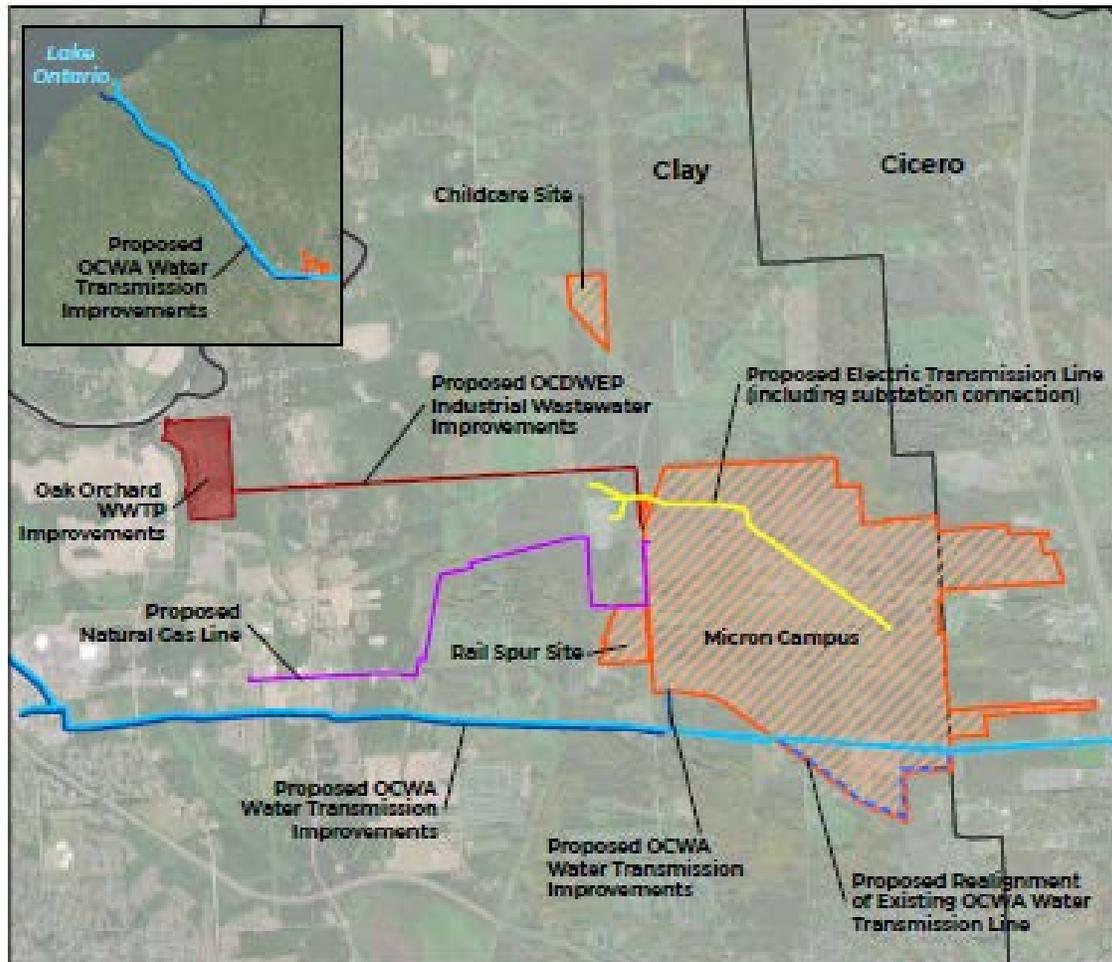
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DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS BUFFALO DISTRICT
478 MAIN STREET
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March 8, 2024

Regulatory Branch

**SUBJECT: Public Scoping for the Proposed Micron Semiconductor Fabrication Facility;
Department of Army No. LRB-2000-02198**

Mr. David Warrington
Regional Administrator
Department of Homeland Security
Federal Emergency Management Agency Region 2
Suite 1337, 26 Federal Plaza
New York, New York 10278

Dear Mr. Warrington:

The U.S. Army Corps of Engineers (USACE), Buffalo District, has received an application for a Department of the Army (DA) permit (USACE number LRB-2000-02198) from Micron New York Semiconductor Manufacturing LLC (Micron), a wholly owned subsidiary of Micron Technology, Inc., to construct a semiconductor manufacturing facility for leading-edge manufacturing of dynamic random-access memory (DRAM) chips. The USACE, as the lead federal agency under the National Environmental Policy Act (NEPA), has determined the proposed project may significantly affect the quality of the human environment and filed a Notice of Intent to prepare an environmental impact statement (EIS) on March 5, 2024.

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Regulatory Branch

SUBJECT: Scoping Letter for the Proposed Micron Semiconductor Fabrication Facility;
Department of Army No. LRB-2000-02198

The National Institute of Standards and Technology's (NIST) CHIPS Program Office (CPO), the Federal Highway Administration (FHWA), and the U.S. Environmental Protection Agency (EPA) have agreed to participate as Cooperating Agencies pursuant to 40 CFR 1501.8.

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Written comments regarding the proposed EIS scope should be submitted to: U.S. Army Corps of Engineers, Buffalo District, Attn: Ms. Margaret Crawford, 7413 County House Road, New York 13021. Individuals who would like to provide comments electronically should submit comments by email to: celrb-micron.public.comments@usace.army.mil.

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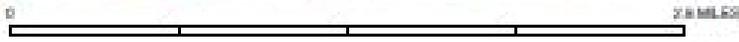
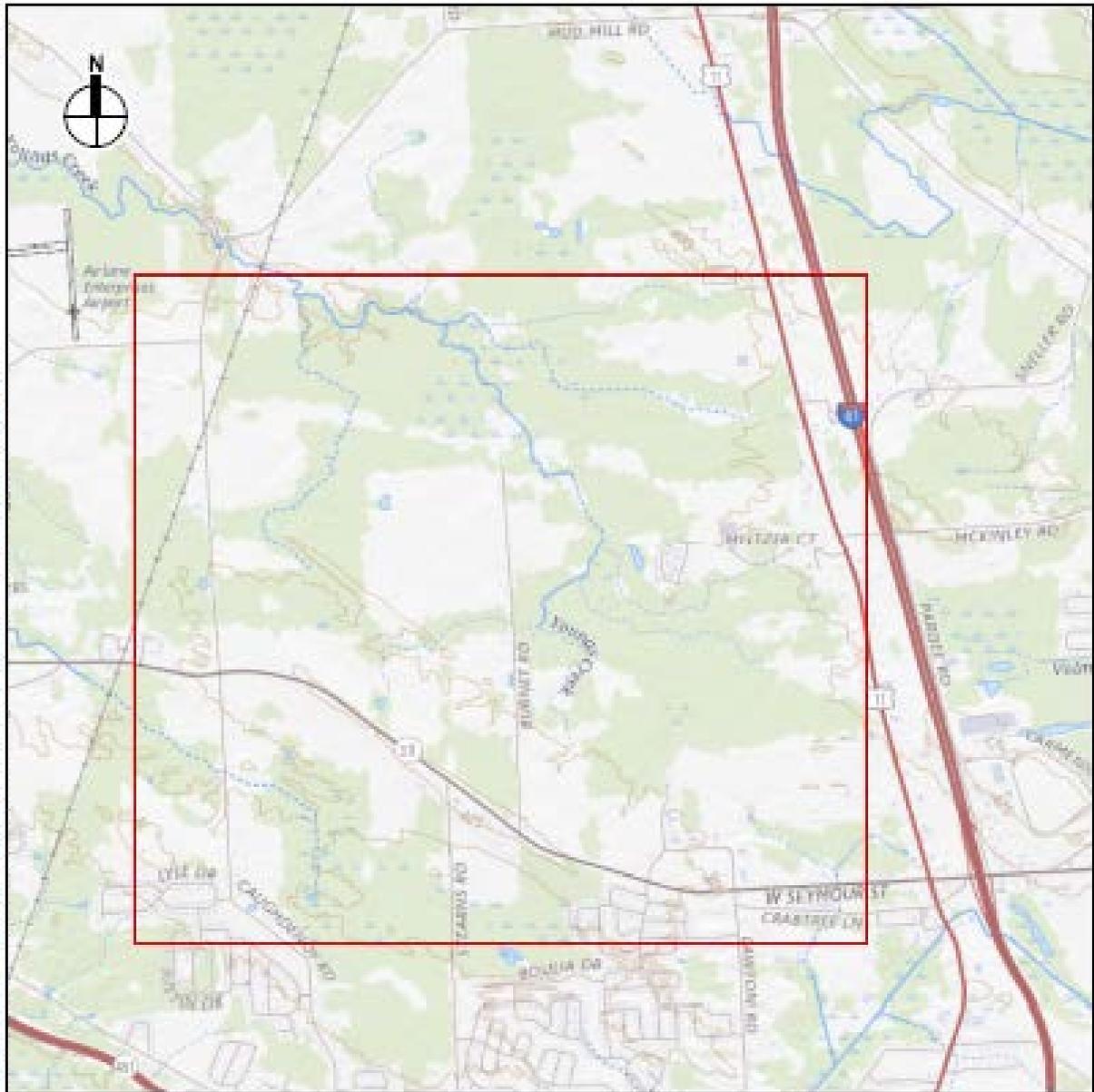
SIGNED

Steven V. Metivier
Chief, Regulatory Branch

Enclosures

8/13/20

Data source: USGS The National Map, <https://www.fgdl.gov/arcgis/arcgis/rest/services/USGSTopoMapServer>



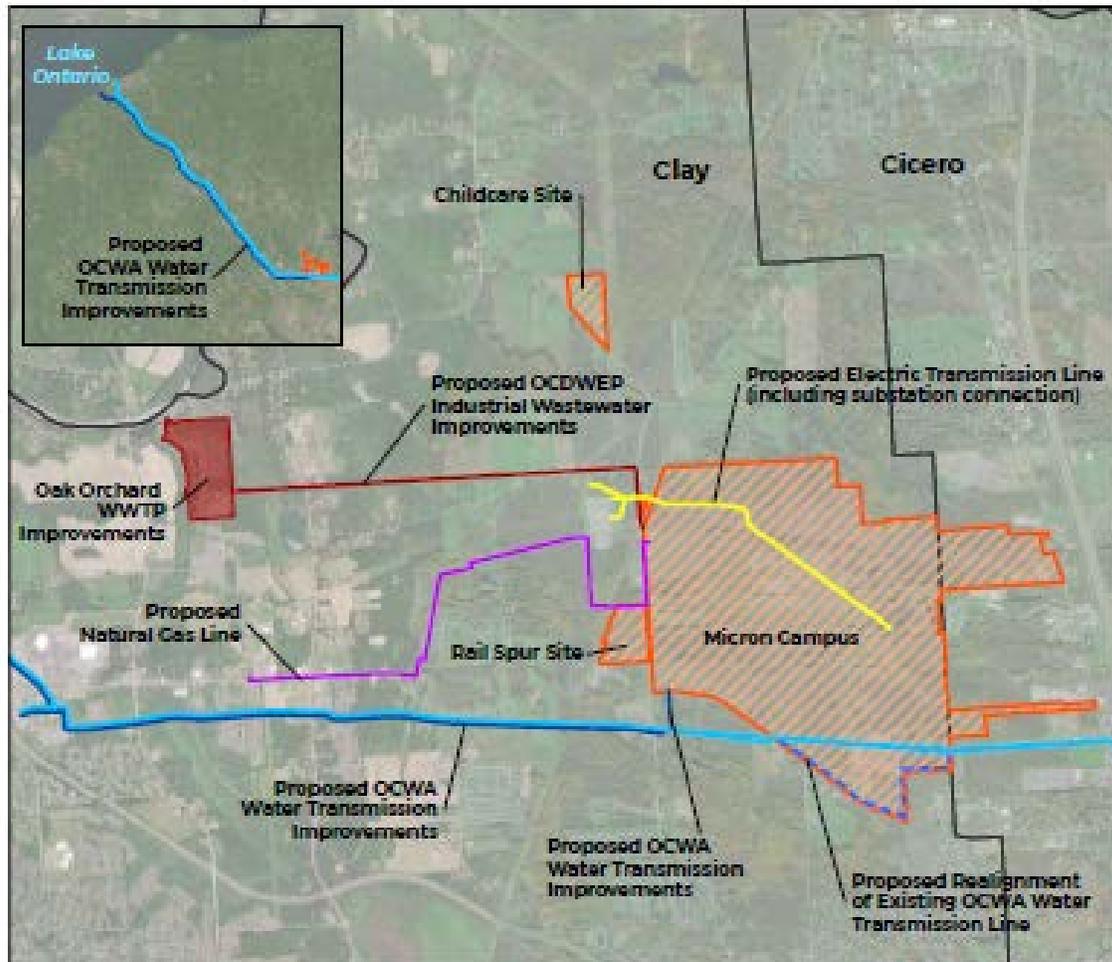
Approximate Project Area

Approximate coordinates of Project Site:
76°8'40"W 43°11'29"N



USGS Topographic Map – Brewerton and Cicero Quadrangles

Micron Semiconductor Manufacturing Facility Project, Clay, NY



Legend

— Existing OCWA Water Transmission Line

□ Municipal Boundary

Proposed Project (Micron)

-  - Micron Campus
-  - Childcare Site
-  - Rail Spur Site

Off-site Improvements (By Others)

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Feet

Coordinate System: NAD 1983 HARN StatePlane New York Central FIPS 3102 Feet
Projection: Transverse Mercator



DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS BUFFALO DISTRICT
478 MAIN STREET
BUFFALO, NY 14202-3278

March 8, 2024

Regulatory Branch

**SUBJECT: Public Scoping for the Proposed Micron Semiconductor Fabrication Facility;
Department of Army No. LRB-2000-02198**

Ms. Gay Vietzke
Regional Director
Department of Interior
National Park Service Region 1
1234 Market Street 20th Floor
Philadelphia, PA 19107

Dear Ms. Vietzke:

The U.S. Army Corps of Engineers (USACE), Buffalo District, has received an application for a Department of the Army (DA) permit (USACE number LRB-2000-02198) from Micron New York Semiconductor Manufacturing LLC (Micron), a wholly owned subsidiary of Micron Technology, Inc., to construct a semiconductor manufacturing facility for leading-edge manufacturing of dynamic random-access memory (DRAM) chips. The USACE, as the lead federal agency under the National Environmental Policy Act (NEPA), has determined the proposed project may significantly affect the quality of the human environment and filed a Notice of Intent to prepare an environmental impact statement (EIS) on March 5, 2024.

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Regulatory Branch

SUBJECT: Scoping Letter for the Proposed Micron Semiconductor Fabrication Facility;
Department of Army No. LRB-2000-02198

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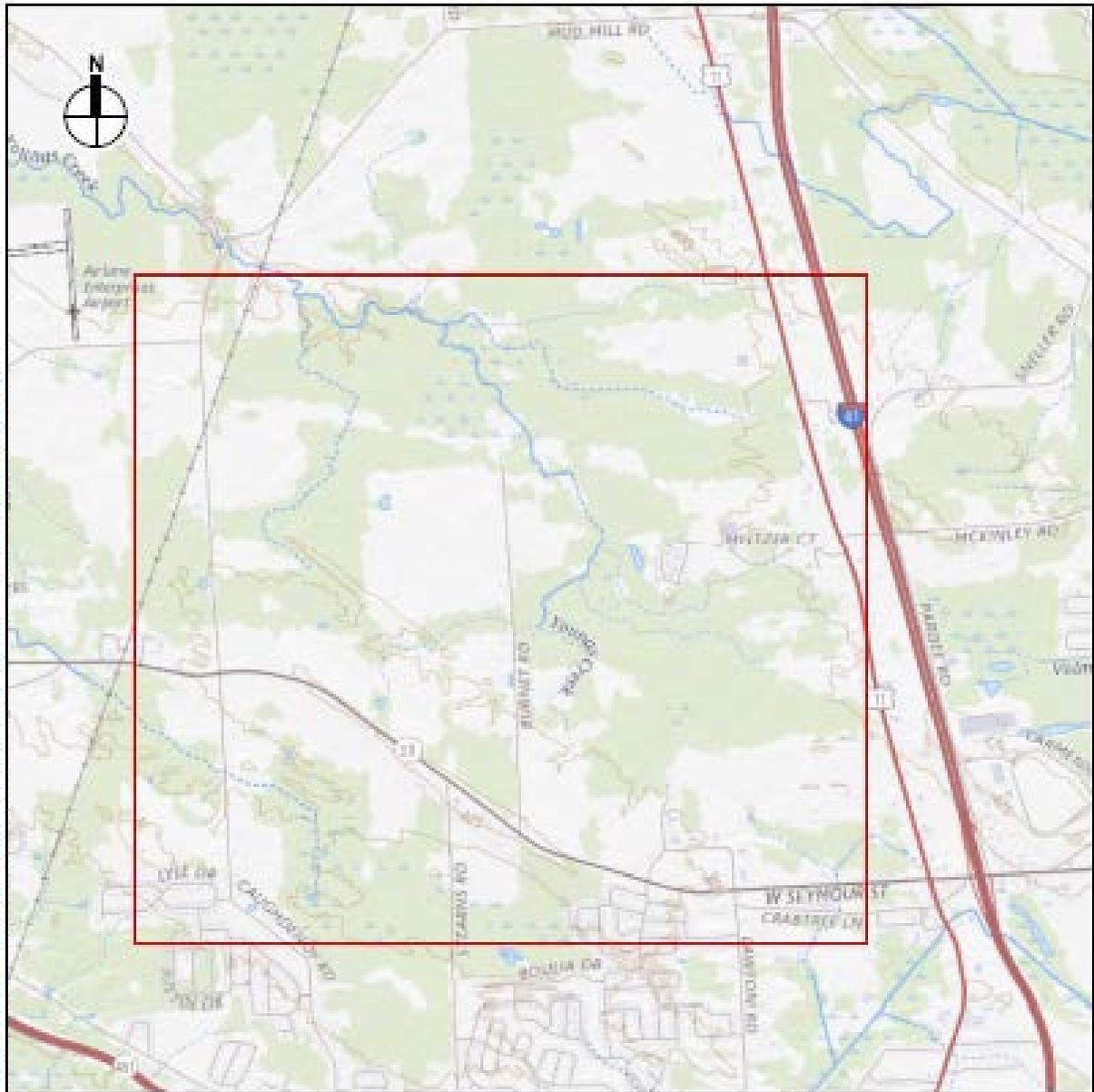
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Steven V. Metivier
Chief, Regulatory Branch

Enclosures

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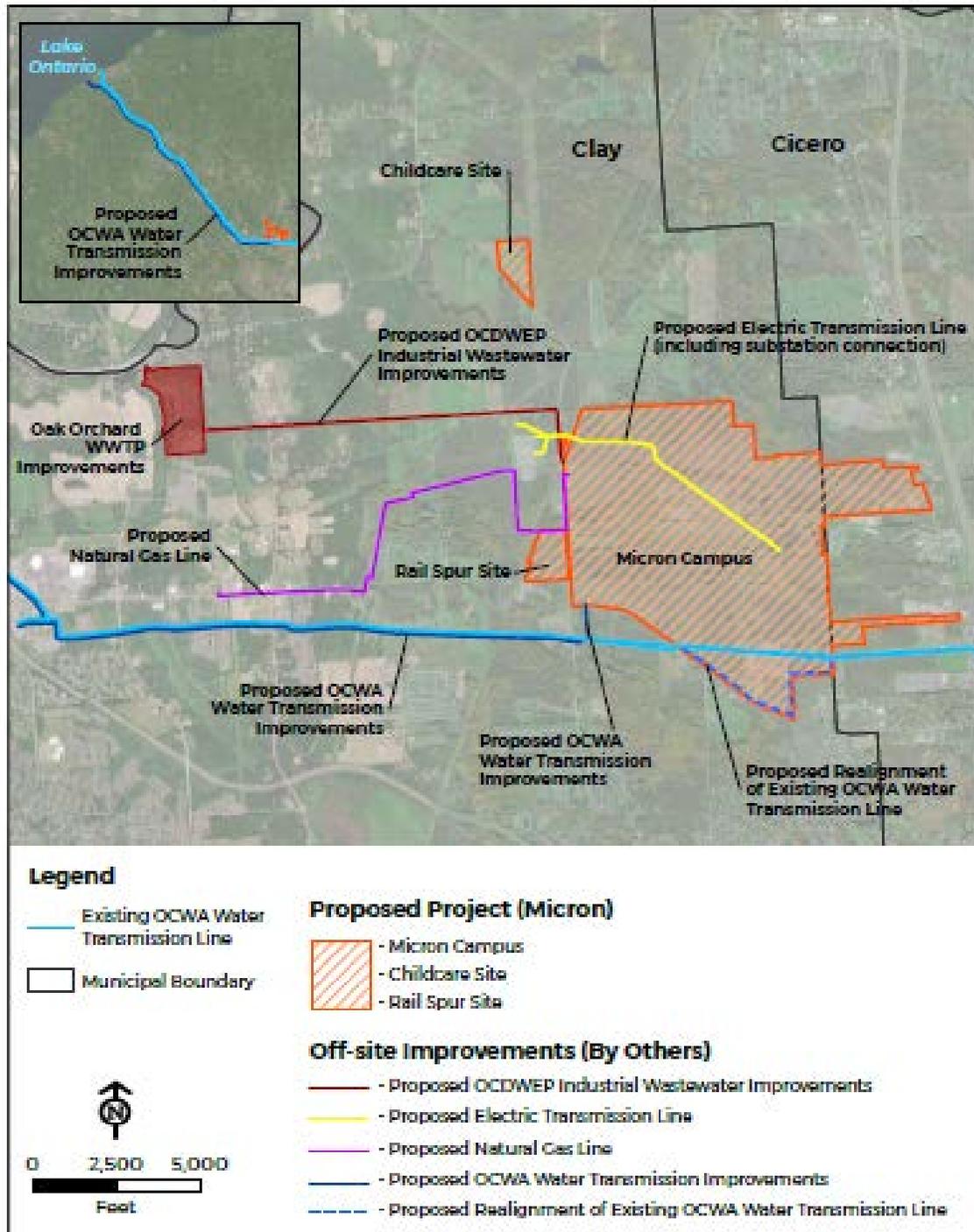
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Micron Semiconductor Manufacturing Facility Project, Clay, NY



Coordinate System: NAD 1983 HARN StatePlane New York Central FIPS 3102 Feet
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DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS BUFFALO DISTRICT
478 MAIN STREET
BUFFALO, NY 14202-3278

March 8, 2024

Regulatory Branch

**SUBJECT: Public Scoping for the Proposed Micron Semiconductor Fabrication Facility;
Department of Army No. LRB-2000-02198**

Ms. Shannon Marie Bozeat
USDA Natural Resources Conservation Service
Lafayette Service Center
2571 Us Route 11 Ste 1
La Fayette, New York 13084

Dear Ms. Bozeat:

The U.S. Army Corps of Engineers (USACE), Buffalo District, has received an application for a Department of the Army (DA) permit (USACE number LRB-2000-02198) from Micron New York Semiconductor Manufacturing LLC (Micron), a wholly owned subsidiary of Micron Technology, Inc., to construct a semiconductor manufacturing facility for leading-edge manufacturing of dynamic random-access memory (DRAM) chips. The USACE, as the lead federal agency under the National Environmental Policy Act (NEPA), has determined the proposed project may significantly affect the quality of the human environment and filed a Notice of Intent to prepare an environmental impact statement (EIS) on March 5, 2024.

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The National Institute of Standards and Technology's (NIST) CHIPS Program Office

Regulatory Branch

SUBJECT: Scoping Letter for the Proposed Micron Semiconductor Fabrication Facility;
Department of Army No. LRB-2000-02198

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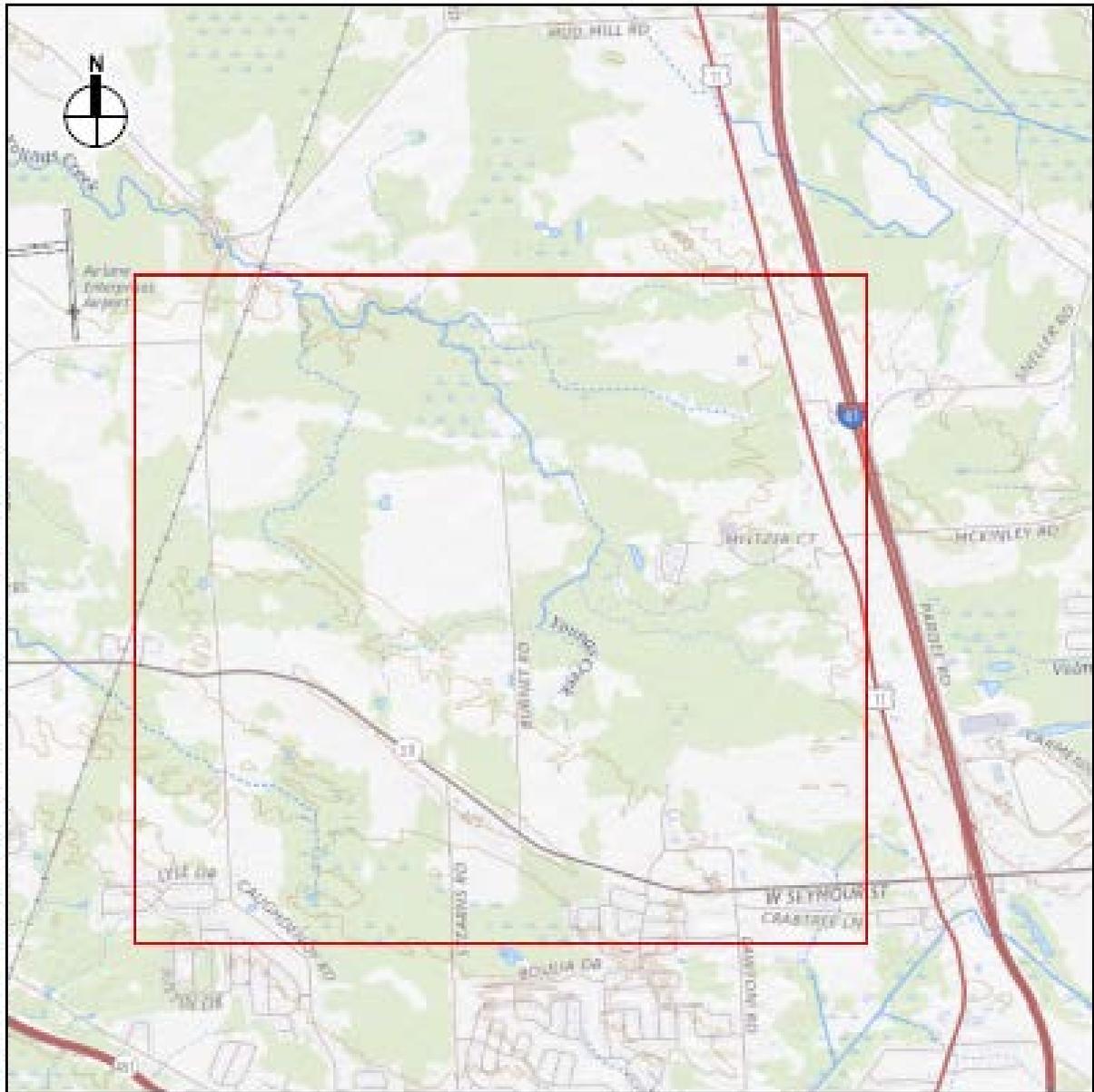
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Steven V. Metivier
Chief, Regulatory Branch

Enclosures

8/13/20

Data source: USGS The National Map, <https://nationalmap.gov/imagery.html>, © 2019 Google Maps Server



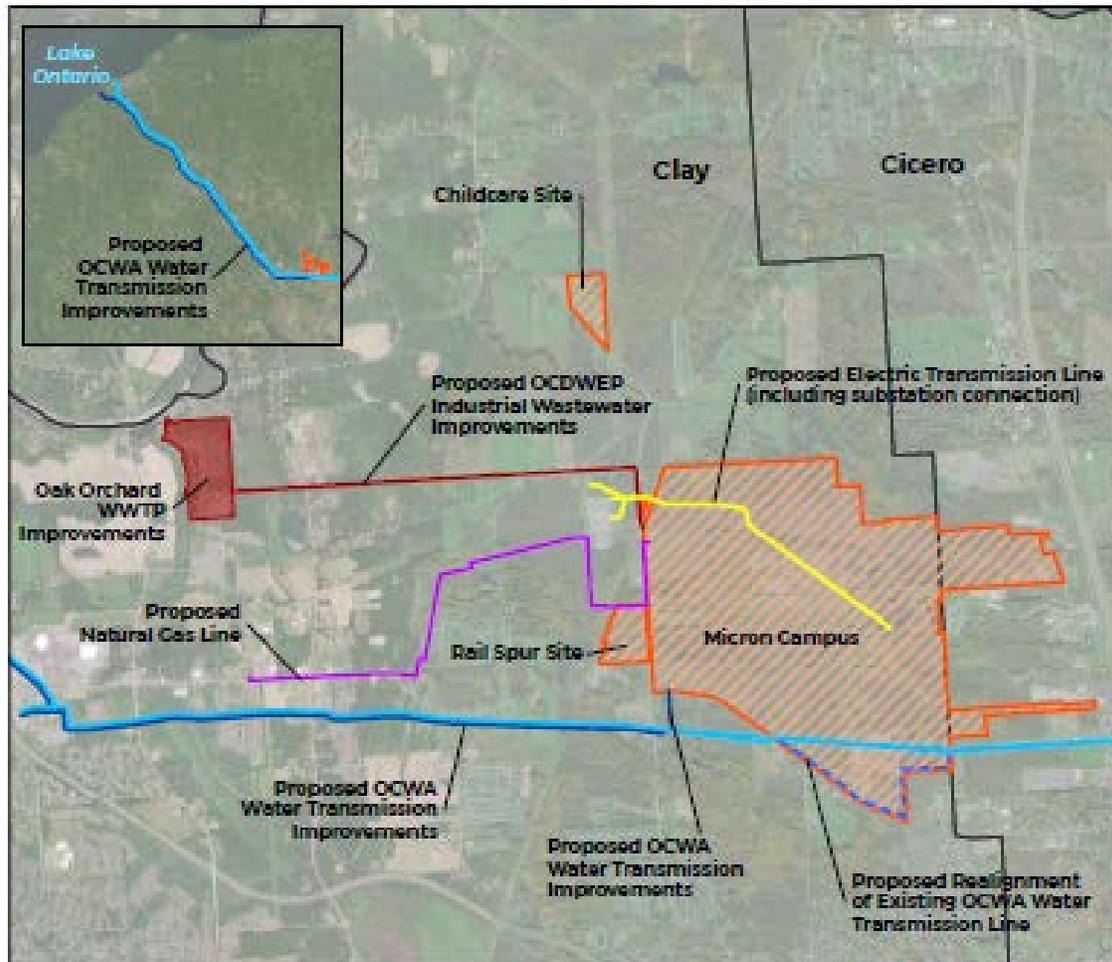
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Micron Semiconductor Manufacturing Facility Project, Clay, NY



Legend

-  Existing OCWA Water Transmission Line
-  Municipal Boundary

Proposed Project (Micron)

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DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS BUFFALO DISTRICT
478 MAIN STREET
BUFFALO, NY 14202-3278

March 8, 2024

Regulatory Branch

**SUBJECT: Public Scoping for the Proposed Micron Semiconductor Fabrication Facility;
Department of Army No. LRB-2000-02198**

Ms. Marie Kennington-Gardiner
Regional Administrator
Federal Aviation Administration
Eastern Region
1 Aviation Plaza
Jamaica, New York 11434

Dear Ms. Kennington-Gardiner:

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Regulatory Branch

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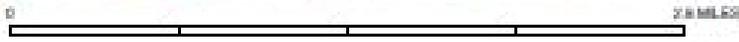
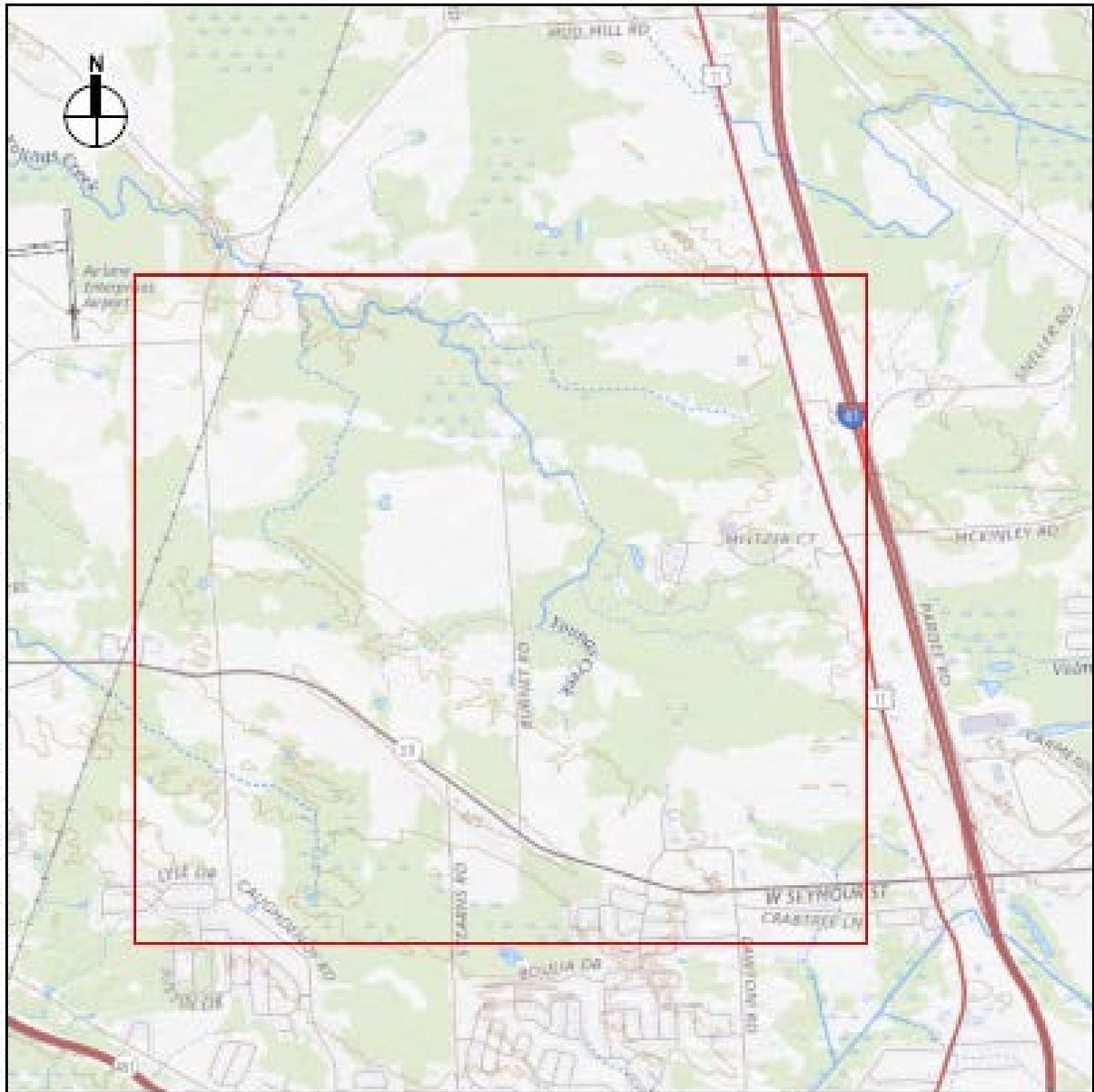
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Steven V. Metivier
Chief, Regulatory Branch

Enclosures

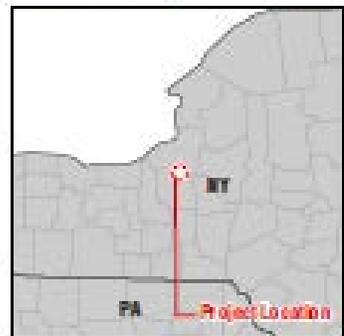
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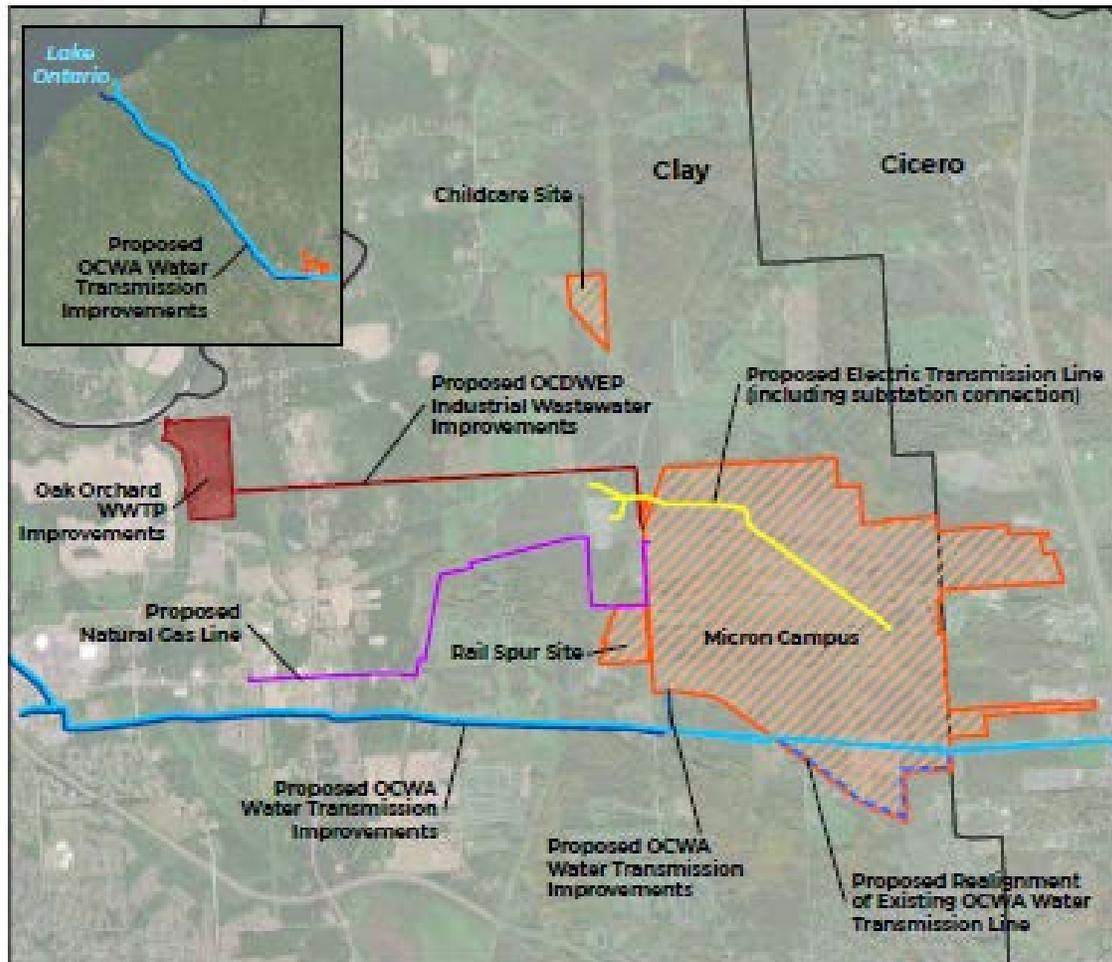
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March 8, 2024

Regulatory Branch

**SUBJECT: Public Scoping for the Proposed Micron Semiconductor Fabrication Facility;
Department of Army No. LRB-2000-02198**

Ms. Therese Fretwell
Regional Environmental Officer
US Department of Housing and Urban Development
Region 2
26 Federal Plaza
New York, New York 10278

Dear Ms. Fretwell:

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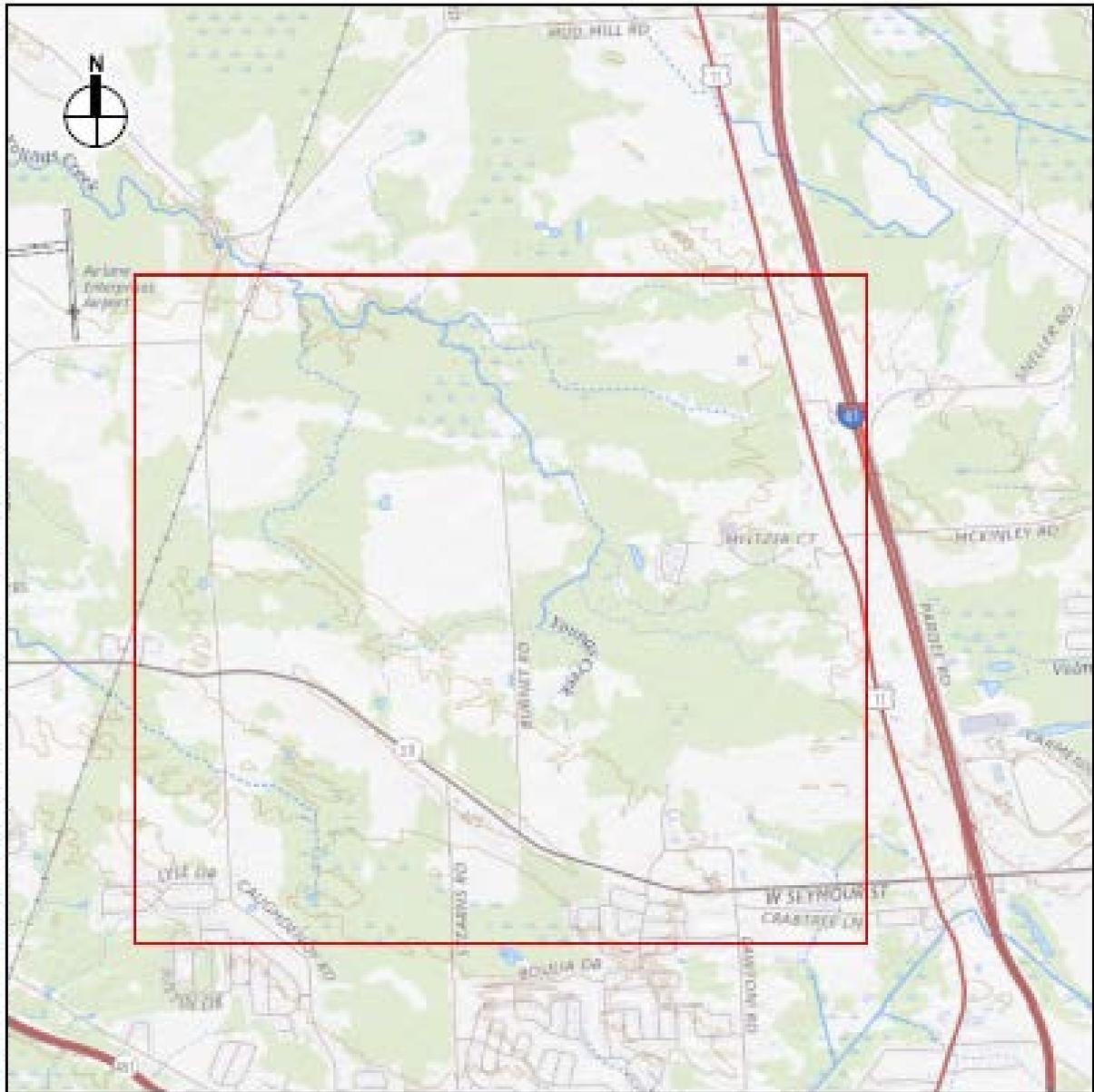
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Chief, Regulatory Branch

Enclosures

8/13/20

Data source: USGS The National Map, <https://www.fgdl.gov/arcgis/arcgis/rest/services/USGSTopoMapServer>



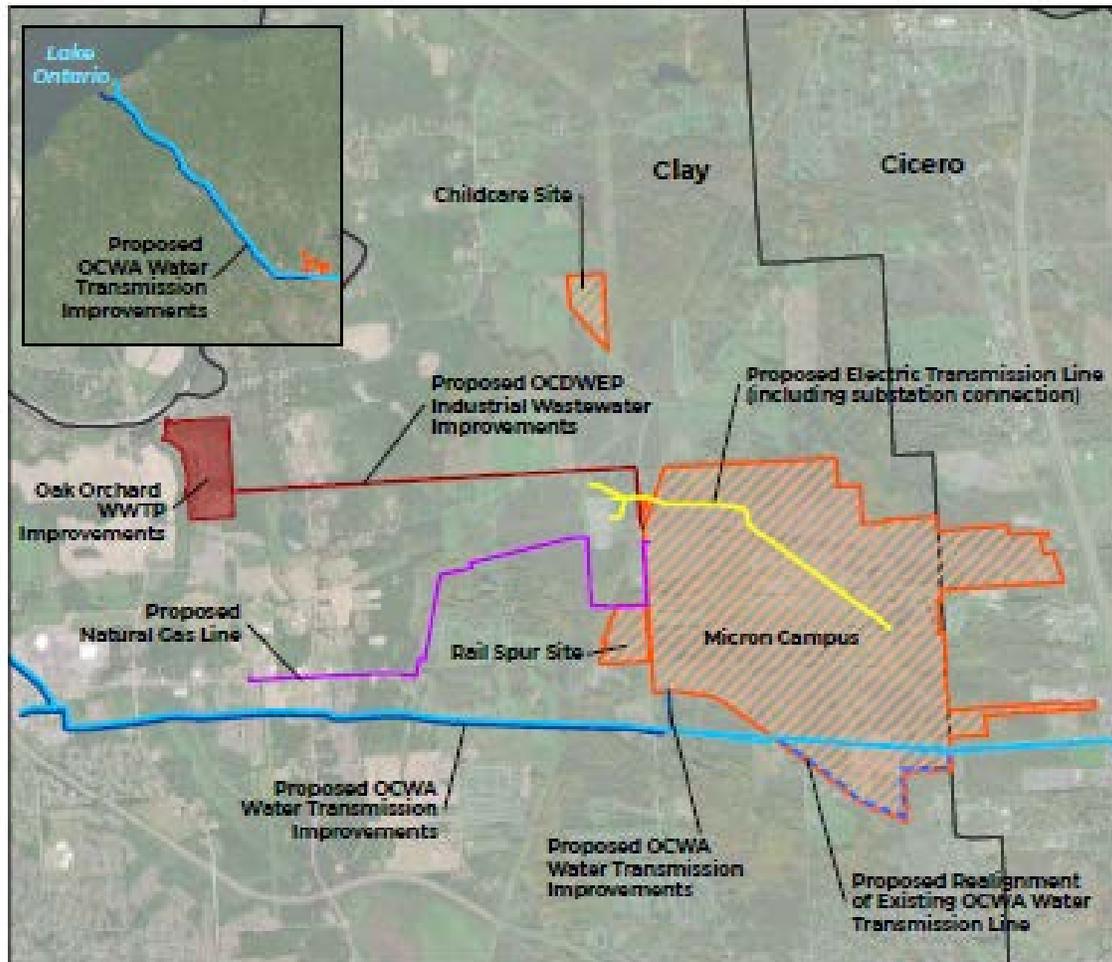
Approximate Project Area

Approximate coordinates of Project Site:
76°8'40"W 43°11'29"N



USGS Topographic Map – Brewerton and Cicero Quadrangles

Micron Semiconductor Manufacturing Facility Project, Clay, NY



Legend

— Existing OCWA Water Transmission Line

□ Municipal Boundary

Proposed Project (Micron)

-  - Micron Campus
-  - Childcare Site
-  - Rail Spur Site

Off-site Improvements (By Others)

-  - Proposed OCDWEP Industrial Wastewater Improvements
-  - Proposed Electric Transmission Line
-  - Proposed Natural Gas Line
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-  - Proposed Realignment of Existing OCWA Water Transmission Line



0 2,500 5,000
Feet

Coordinate System: NAD 1983 HARN StatePlane New York Central FIPS 5102 Feet
Projection: Transverse Mercator



DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS BUFFALO DISTRICT
478 MAIN STREET
BUFFALO, NY 14202-3278

March 8, 2024

Regulatory Branch

**SUBJECT: Public Scoping for the Proposed Micron Semiconductor Fabrication Facility;
Department of Army No. LRB-2000-02198**

Mr. Joel Taubenblatt
Bureau Chief
Federal Communications Commission
Wireless Communications Bureau
45 L Street NE
Washington, DC 20554

Dear Mr. Taubenblatt:

The U.S. Army Corps of Engineers (USACE), Buffalo District, has received an application for a Department of the Army (DA) permit (USACE number LRB-2000-02198) from Micron New York Semiconductor Manufacturing LLC (Micron), a wholly owned subsidiary of Micron Technology, Inc., to construct a semiconductor manufacturing facility for leading-edge manufacturing of dynamic random-access memory (DRAM) chips. The USACE, as the lead federal agency under the National Environmental Policy Act (NEPA), has determined the proposed project may significantly affect the quality of the human environment and filed a Notice of Intent to prepare an environmental impact statement (EIS) on March 5, 2024.

Micron is proposing to acquire the approximately 1400-acre White Pine Commerce Park site, located at 5171 Route 31, Clay, NY 13041, from the Onondaga County Industrial Development Agency (OCIDA), and to construct the semiconductor manufacturing facility over a continuous 20-year period. The Proposed Project consists of (1) construction of the Micron Campus, which will include four individual memory fabrication units (fabs), ancillary support facilities, driveways, and parking; (2) construction of a childcare and health care center located at 9100 Caughdenoy Road, Brewerton, NY; (3) construction of a connection to the National Grid substation, adjacent to the Micron Campus, and (4) a rail spur on the west side of Caughdenoy Road adjacent to the proposed facility. Micron intends to start construction of the Micron Campus in 2025, with two fabs (Fabs 1 and 2) becoming operational by 2029. Two more fabs (Fabs 3 and 4) would be operational by 2041. Separately, Onondaga County plans to improve the water supply and wastewater infrastructure to support operations of the manufacturing plant. The National Grid utility company plans to upgrade the energy infrastructure to support the Proposed Project. The Proposed Project is anticipated to involve placement of fill into a total of approximately 226 acres of federally regulated wetlands on the proposed Micron Campus, 18 acres on the Rail Spur property west of the proposed campus, and 7,523 linear feet of federally regulated streams and ditches. The applicant proposes to develop a compensatory wetland mitigation plan to offset permanent losses of waters of the United States from the Proposed Project.

Regulatory Branch

SUBJECT: Scoping Letter for the Proposed Micron Semiconductor Fabrication Facility;
Department of Army No. LRB-2000-02198

The National Institute of Standards and Technology's (NIST) CHIPS Program Office (CPO), the Federal Highway Administration (FHWA), and the U.S. Environmental Protection Agency (EPA) have agreed to participate as Cooperating Agencies pursuant to 40 CFR 1501.8.

One public scoping meeting on the Proposed Project will be conducted. The purpose of the meeting is to provide information regarding the Proposed Project, answer questions, and accept comments regarding the potential environmental impacts and effects to historic properties that may result from construction and operation of the Proposed Project. The public scoping meeting will be held on Tuesday March 19, 2024, 7 p.m. Eastern Time at the Town of Clay, Town Hall Board Room; 4401 Route 31; Clay, NY 13041. Agencies, organizations, and members of the general public are invited to present comments or suggestions with regard to the range of actions, alternatives, and potential impacts to be considered in the EIS.

The scoping period will continue for 30 days from the date of the Notice of Intent and will close on April 4, 2024. During the scoping period, the USACE invites federal, state, and local agencies, Tribal Nations, other interested parties, and the general public to participate in the scoping process. The purpose of the scoping process is to provide information to the public, serve as a mechanism to solicit agency and public input on alternatives, identify significant issues to be analyzed in the EIS, and ensure full and open participation in scoping for the draft EIS. USACE anticipates that potential impacts to land use; socioeconomic conditions; environmental justice communities; historic and cultural resources; visual impacts; geology, soils, and topography; water resources; biological resources; solid waste; hazardous materials; health and safety; transportation; air quality; greenhouse gas emissions and climate change; noise; and utilities and infrastructure will be analyzed in the EIS. All comments must include the USACE number LRB-2000-02198. In order to be accepted, email comments must originate from the author's email account. All comments received will become part of the administrative record and are subject to public release under the Freedom of Information Act, including any personally identifiable information such as names, phone numbers, and addresses.

Written comments regarding the proposed EIS scope should be submitted to: U.S. Army Corps of Engineers, Buffalo District, Attn: Ms. Margaret Crawford, 7413 County House Road, New York 13021. Individuals who would like to provide comments electronically should submit comments by email to: celrb-micron.public.comments@usace.army.mil.

Sincerely,

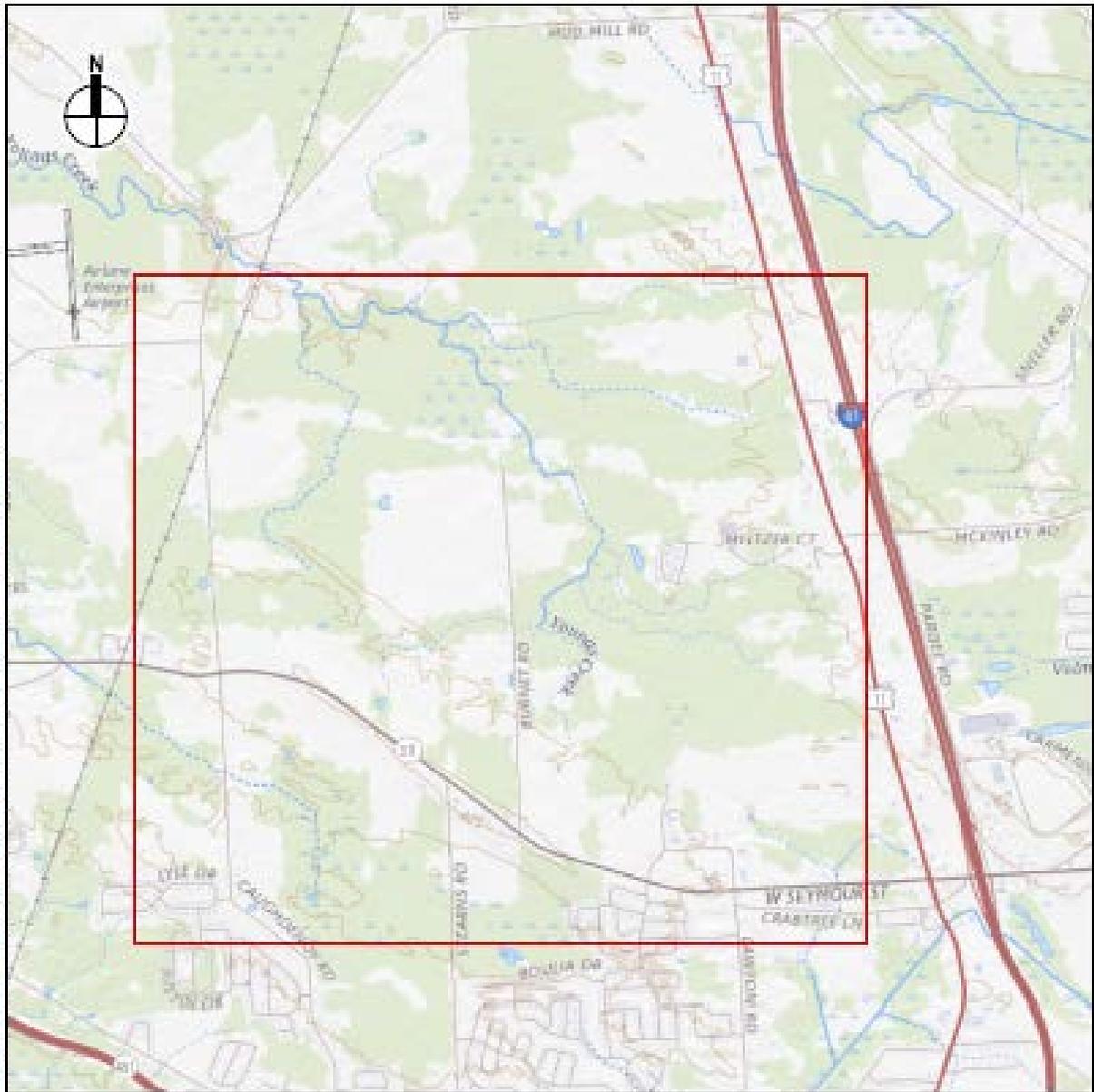
SIGNED

Steven V. Metivier
Chief, Regulatory Branch

Enclosures

8/13/20

Data source: USGS The National Map, <https://nationalmap.gov/imagery.html>, © 2019 Esri/ArcGIS Server



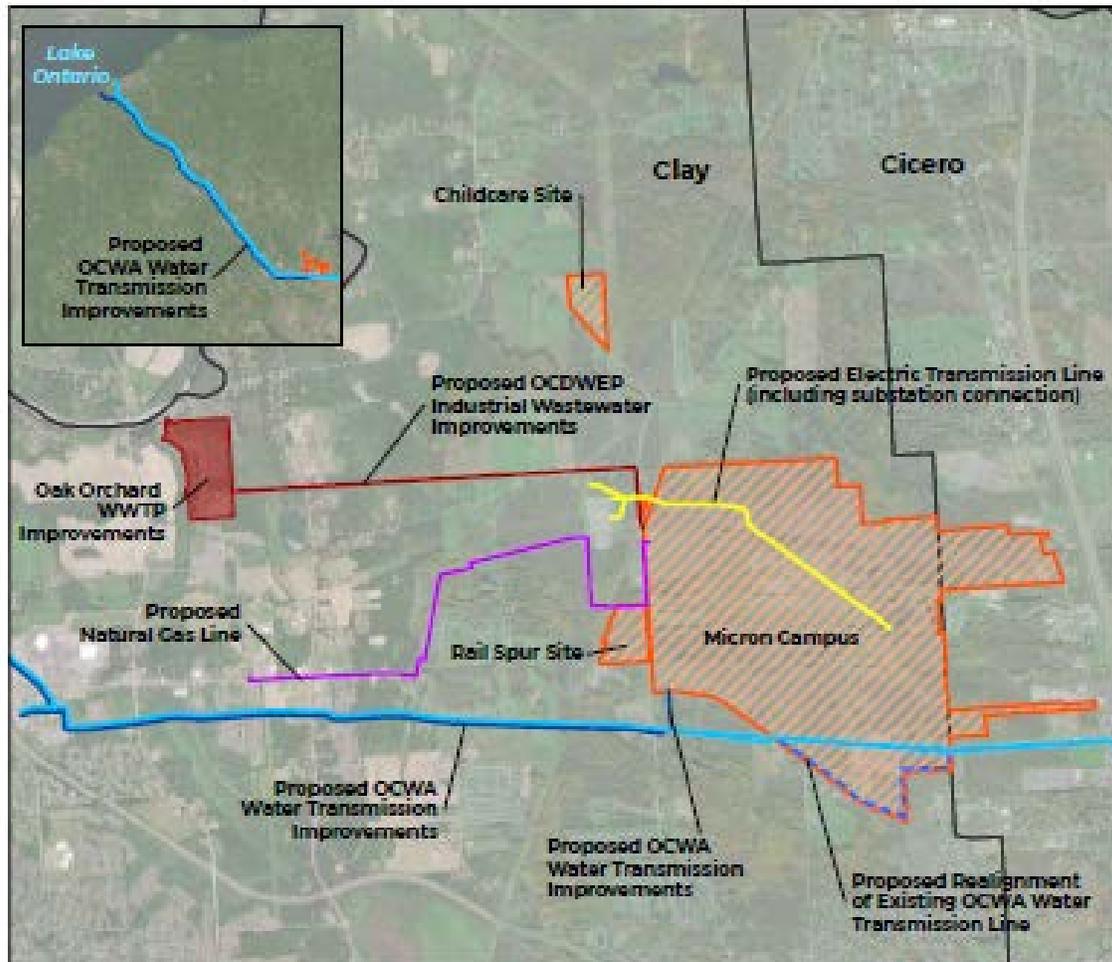
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DEPARTMENT OF THE ARMY
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478 MAIN STREET
BUFFALO, NY 14202-3278

March 8, 2024

Regulatory Branch

**SUBJECT: Public Scoping for the Proposed Micron Semiconductor Fabrication Facility;
Department of Army No. LRB-2000-02198**

Ms. Deborah Broderson
Attorney Advisor
Federal Communications Commission
Office of General Counsel
45 L Street NE
Washington, DC 20554

Dear Ms. Broderson:

The U.S. Army Corps of Engineers (USACE), Buffalo District, has received an application for a Department of the Army (DA) permit (USACE number LRB-2000-02198) from Micron New York Semiconductor Manufacturing LLC (Micron), a wholly owned subsidiary of Micron Technology, Inc., to construct a semiconductor manufacturing facility for leading-edge manufacturing of dynamic random-access memory (DRAM) chips. The USACE, as the lead federal agency under the National Environmental Policy Act (NEPA), has determined the proposed project may significantly affect the quality of the human environment and filed a Notice of Intent to prepare an environmental impact statement (EIS) on March 5, 2024.

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Regulatory Branch

SUBJECT: Scoping Letter for the Proposed Micron Semiconductor Fabrication Facility;
Department of Army No. LRB-2000-02198

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Sincerely,

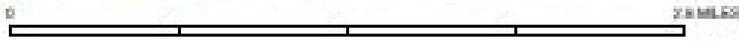
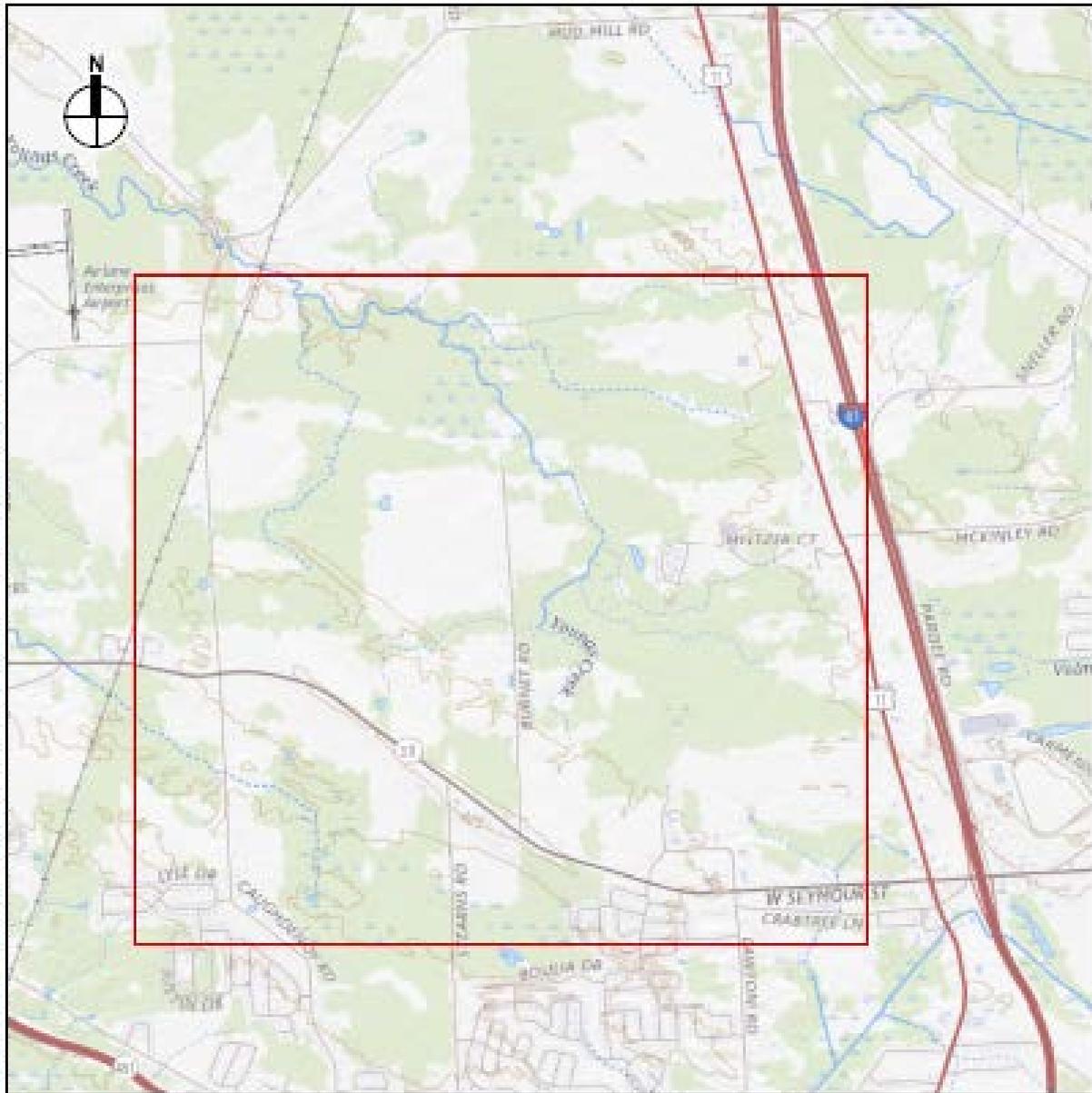
SIGNED

Steven V. Metivier
Chief, Regulatory Branch

Enclosures

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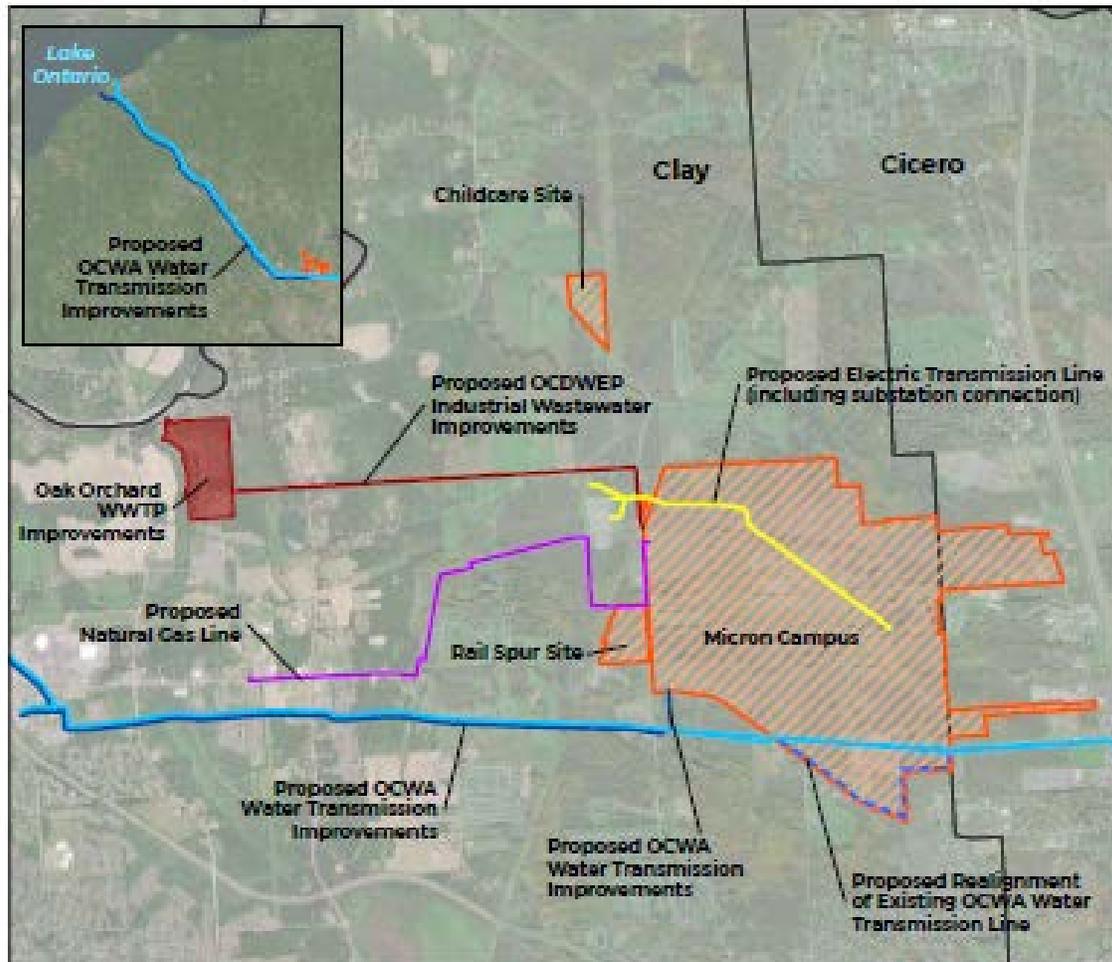
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DEPARTMENT OF THE ARMY
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478 MAIN STREET
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March 8, 2024

Regulatory Branch

**SUBJECT: Public Scoping for the Proposed Micron Semiconductor Fabrication Facility;
Department of Army No. LRB-2000-02198**

Department of Interior
Bureau of Indian Affairs-Eastern Region
545 Marriott Dr
Nashville, Tennessee 37214

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Regulatory Branch

SUBJECT: Scoping Letter for the Proposed Micron Semiconductor Fabrication Facility;
Department of Army No. LRB-2000-02198

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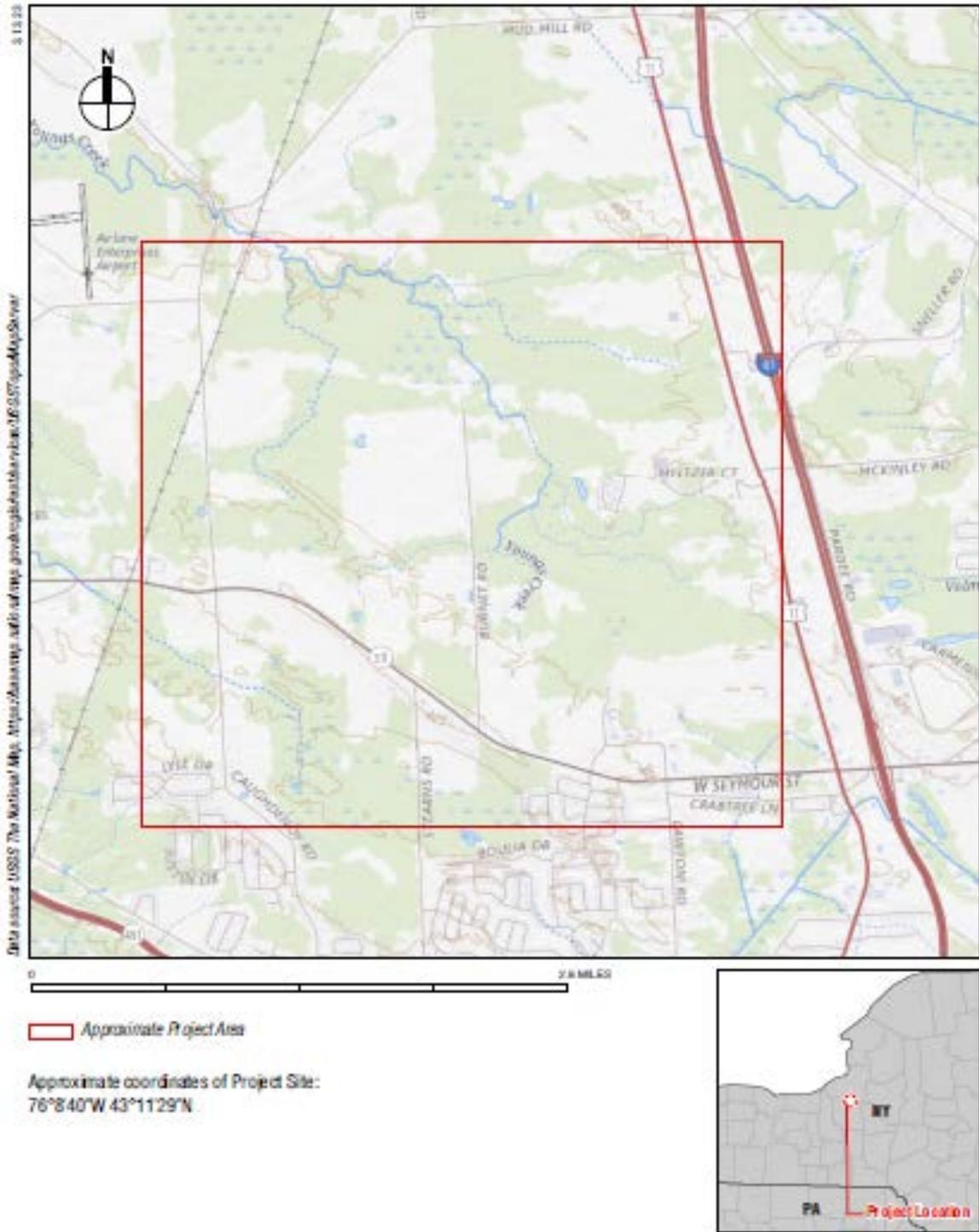
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Sincerely,

SIGNED

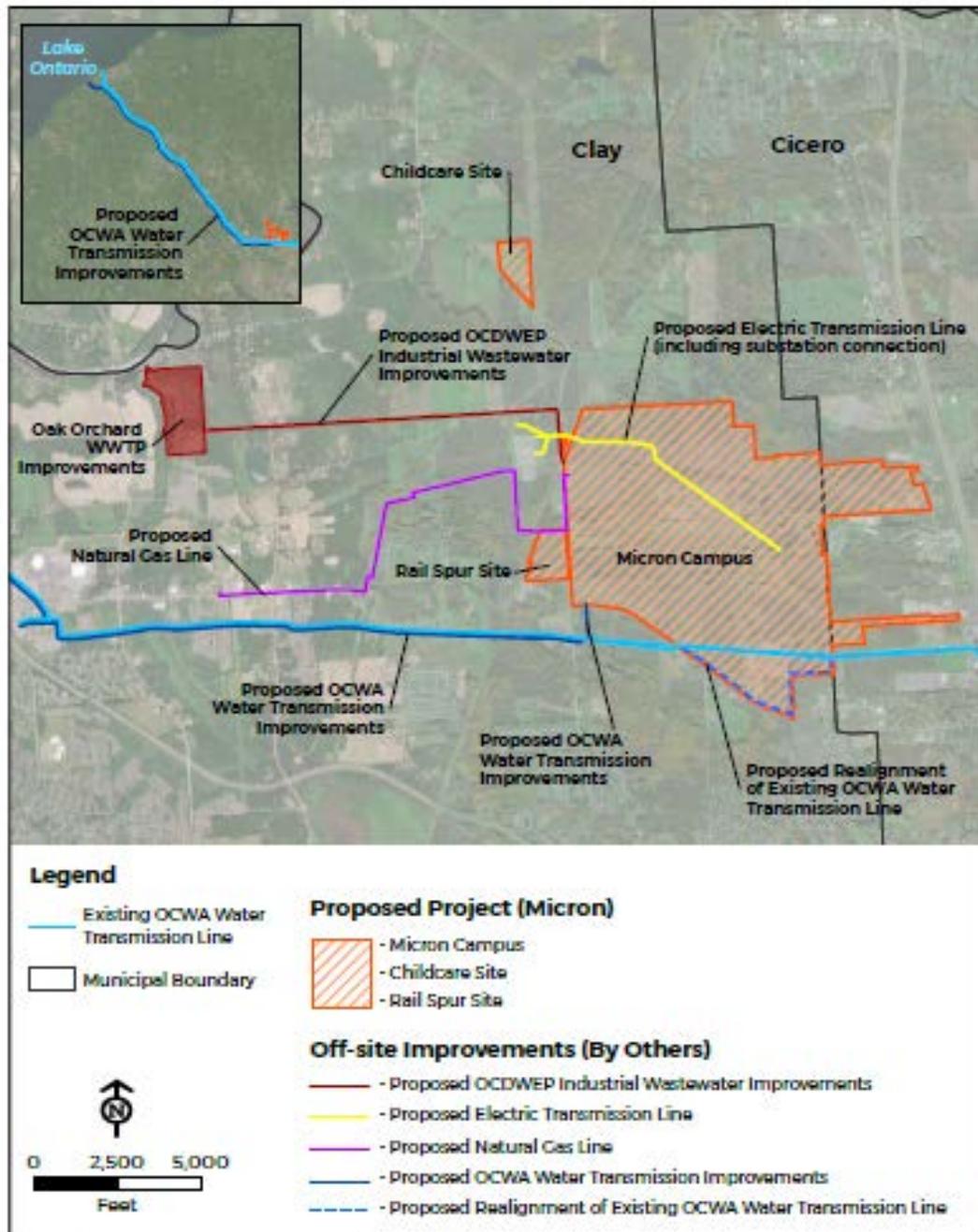
Steven V. Metivier
Chief, Regulatory Branch

Enclosures



USGS Topographic Map – Brewerton and Cicero Quadrangles

Micron Semiconductor Manufacturing Facility Project, Clay, NY





June 27, 2025

Michael Martucci, Regional Administrator
U.S. Environmental Protection Agency Region 2
290 Broadway
New York, New York 10007-1866

Dear Mr. Martucci:

On June 27, 2025, the Creating Helpful Incentives to Produce Semiconductors (CHIPS) Program Office (CPO) within the U.S. Department of Commerce, as joint lead agency with the Onondaga County Industrial Development Agency (OCIDA), published the Draft Environmental Impact Statement (Draft EIS) for the proposed Micron New York Semiconductor Manufacturing Project. CPO and OCIDA jointly prepared this Draft EIS to evaluate the potential environmental effects of the project as required under the National Environmental Policy Act and the New York State Environmental Quality Review Act. A link to the Draft EIS and all appendices is included here <https://www.nist.gov/chips/chips-incentives-funding-opportunities/environmental-division/national-environmental-policy>.

Copies of these documents may also be viewed at the following library during normal business hours:

Onondaga County Public Library
447 South Salina St.
Syracuse, NY 13202

A public hearing will be held on Thursday, July 24, 2025, with public comment sessions from 10 am – 1 pm; 2 pm – 5 pm; and 6 pm – 9 pm, to gather unsworn, public comment on the Draft EIS. The hearing will take place at the Liverpool High School Auditorium, 4338 Wetzell Road, Liverpool, New York, 13090.

Written comments on the Draft EIS will be accepted by mail or e-mail to chipsnepa@chips.gov until **August 11, 2025**. Because this is a joint Federal and State Draft EIS, all comments submitted to either CPO or OCIDA will be considered by both agencies. Comments do not need to be submitted to both agencies to be considered.

Page 2

Sincerely,

David Frenkel

David Frenkel
Director
Environmental Division
CHIPS Program Office

STATE ENVIRONMENTAL QUALITY REVIEW ACT

NOTICE OF COMPLETION AND PUBLIC HEARING DRAFT ENVIRONMENTAL IMPACT STATEMENT

MICRON NEW YORK SEMICONDUCTOR MANUFACTURING PROJECT

This notice is issued pursuant to Part 617 of the implementing regulations pertaining to Article 8, State Environmental Quality Review Act (SEQRA) of the New York State Environmental Conservation Law and the regulations adopted pursuant thereto (6 NYCRR Part 617). The Onondaga County Industrial Development Agency (OCIDA), as joint lead agency with the Creating Helpful Incentives to Produce Semiconductors (CHIPS) Program Office (CPO) created by the U.S. Department of Commerce, has accepted for public review and comment the Draft Environmental Impact Statement (Draft EIS) for the proposed Micron New York Semiconductor Manufacturing Project. CPO and OCIDA jointly prepared this Draft EIS to evaluate the potential environmental effects of the Proposed Project as required under the National Environmental Policy Act (NEPA) and SEQRA. A copy of the Draft EIS may be viewed on OCIDA's webpage at: <https://ongoved.com/microndeis2025/>.

A paper copy may also be viewed at the office of OCIDA during normal business hours by appointment by using the phone number below. Copies of these documents may also be viewed at the Town of Clay Town Hall and Town of Cicero Municipal Offices as well as the following library during normal business hours:

Onondaga County Public Library
447 South Salina St.
Syracuse, NY 13202

Public comment sessions will be held from 10 am – 1 pm; 2 pm – 5 pm; and 6 pm – 9 pm on Thursday, July 24, 2025, pursuant to 6 NYCRR Part 617, to gather unsworn, public comment on the Draft EIS. The meeting will take place at the Liverpool High School Auditorium, 4338 Wetzel Road, Liverpool, New York, 13090. All persons, organizations, corporations, or government agencies that may be affected by the proposed project are invited to attend the meeting and to submit oral or written comments. Lengthy statements should be in writing and summarized for oral presentation. Reasonable time limits may be set for each speaker to afford everyone an opportunity to be heard. Equal weight will be given to both oral and written statements. The public comment session will have simultaneous Spanish and American Sign Language interpretation. To request additional language translation services or special needs assistance, at no charge, please contact OCIDA by 5:00 p.m. **July 14, 2025**, using the contact information listed below.

Written comments on the Draft EIS will be accepted by OCIDA and must be submitted by mail or e-mail to the contact listed below until **August 11, 2025**. Because this is a joint Federal and State Draft EIS, all comments submitted to either OCIDA or CPO will be considered by both agencies.

Comments do not need to be submitted to both agencies to be considered. There will be no extension of the comment period.

Micron New York Semiconductor Manufacturing LLC (Micron), a wholly owned subsidiary of Micron Technology, Inc., proposes to construct and operate a semiconductor manufacturing facility with four semiconductor fabrication buildings (fabs) on an approximately 1,377-acre site consisting primarily of the White Pine Commerce Park (WPCP), principally located at 5171 Route 31, Town of Clay, New York. In total, the Proposed Project would consist of: construction of the Micron Campus at the WPCP, including the four fabs, ancillary support facilities, ingress and egress roads, driveways, and parking; construction of a rail spur and construction material conveyance facility to support construction of the Micron Campus (Rail Spur Site); construction of a childcare center, healthcare center, and recreational center (Childcare Site); and leasing of existing warehouse space in an industrially zoned area at a location to be determined within 20 miles of the Micron Campus (Warehouse Site). The Proposed Project will also require utility and infrastructure improvements to meet its electricity, natural gas, water supply, wastewater, and telecommunications needs (Connected Actions).

Construction and operation of the Proposed Project and Connected Actions requires action from several Federal, State, and local agencies. Micron is also seeking federal funding under the Creating Helpful Incentives to Produce Semiconductors for America Act (the “CHIPS Act”), as amended by the CHIPS Act of 2022, and has submitted applications and requests for certain Federal permits and approvals that require Federal environmental review, including, but not limited to, Federal wetlands permits pursuant to Section 404 of the Clean Water Act. New York State is considering providing financial support and tax incentives to Micron under the New York Green CHIPS Program and the Green CHIPS Excelsior Jobs Tax Credit Program to support construction and operation of the Proposed Project within New York State. In addition, OCIDA is considering Micron’s application for a grant of financial assistance to construct the Proposed Project and the use of its condemnation authority pursuant to the New York Eminent Domain Procedure Law. OCIDA is also considering whether to lease, and ultimately sell to Micron, the WPCP where the Proposed Project will be located. Other Federal, State and local land use decisions, permits, authorizations and approvals are also under consideration by relevant agencies and authorities.

The Draft EIS analyzed the following areas of potential environmental impacts from the No Action Alternative and the Proposed Action Alternatives: Land Use, Zoning and Public Policy; Geology, Soils and Topography; Water Resources; Biological Resources; Historic and Cultural Resources; Air Quality; Greenhouse Gas and Climate Change; Solid Waste and Hazardous Materials; Human Health and Safety; Utilities and Infrastructure; Transportation; Noise and Vibration; Visual Impacts and Community Character; Community Facilities, Open Space and Recreation; Socioeconomics; and Environmental Justice.

Contact Information:

Onondaga County Industrial Development Agency
ATTN: Micron Project
335 Montgomery Street, 2nd Floor

Syracuse, New York 13202
Phone: (315) 435-3770
Fax: (315) 435-3669

Written comments may be submitted jointly to OCIDA and CPO at the above mailing address or via email at: CHIPSNEPA@chips.gov

To: All SEQRA Involved & Interested Agencies

Enclosed is a flash drive containing an electronic copy of the Draft EIS.

Mailing List:

SEQRA Involved Agencies

Amanda Lefton, Commissioner
New York State Department of Environmental Conservation
625 Broadway
Albany, NY 12233

Dereth Glance, Regional Director
Region 7
New York State Department of Environmental Conservation
5786 Widewaters Parkway
Syracuse, NY 13214-1867

Marie Therese Dominguez, Commissioner
New York State Department of Transportation
50 Wolf Road
Albany, NY 12232

David P. Smith, P.E., Regional Director
New York State Department of Transportation
State Office Building
333 E. Washington Street
Syracuse, NY 13202

Hope Knight, President & CEO
Empire State Development
655 Third Avenue – Floor 4
New York, NY 10017

New York Power Authority
Justin E. Driscoll, Acting President & CEO
123 Main Street
White Plains, NY 10601-3170

Commissioner Jeanette M. Moy
Office of General Services
36th Floor, Corning Tower
Empire State Plaza
Albany, NY 12242

Walter T. Mosley, Secretary of State
New York State Department of State
One Commerce Plaza
99 Washington Avenue
Albany, NY 12231

Justin E. Driscoll, President and CEO
NYS Canal Corporation
30 South Pearl St, 5th Floor
Albany NY 12207

Randy Simons, Commissioner Pro Tem/Chief of Staff
New York State Office of Parks, Recreation & Historic Preservation
625 Broadway
Albany, NY 12207

New York State Department of Environmental Conservation
Division of Environmental Permits
625 Broadway
Albany, NY 12233

J. Ryan McMahon, II, County Executive
John H. Mulroy Civic Center
421 Montgomery Street, 14th Floor
Syracuse, New York 13202

Martin E. Voss, Commissioner
Onondaga County Department of Transportation
6230 East Molloy Rd.
East Syracuse, NY 13057

Shannon L. Harty, Commissioner
Onondaga County Water Environment Protection
650 Hiawatha Boulevard
Syracuse, New York 13204

Benjamin Yaus, First Chief Deputy County Attorney
Onondaga County Law Department
John H. Mulroy Civic Center
421 Montgomery Street - 10th Floor
Syracuse, New York 13202

Cydney Johnson
Deputy County Executive for Physical Services
John H. Mulroy Civic Center
421 Montgomery Street
Syracuse, New York 13202

Onondaga County Water Authority
Jeffrey D. Brown, Esq. Executive Director
200 Northern Concourse
Syracuse, New York 13212

Damian M. Ulatowski, Supervisor
Town of Clay
4401 State Route 31
Clay, New York 13041

Russ Mitchell, Chairman
Planning Board
Town of Clay
4401 State Route 31
Clay, New York 13041

Vivian Mason, Chair
Zoning Board of Appeals
Town of Clay
4401 State Route 31
Clay, New York 13041

Mark Marzullo, Chairman
Planning Board
Town of Cicero
8236 Brewerton Road
Cicero, New York 13039

SEORA Interested Agencies

Doreen M. Harris, President & CEO
New York State Energy Research and Development Authority
17 Columbia Circle
Albany, NY 12203-6399

Russell King, Assistant Counsel
New York State Department of Public Service
3 Empire State Plaza
Albany, NY 12223-1350

Troy Waffner, Planning Director
Syracuse-Onondaga County Planning Agency
335 Montgomery Street, 1st Floor
Carnegie Building
Syracuse, New York 13202

James D'Agostino, Director
Syracuse Metropolitan Transportation Council
100 Clinton Square
126 North Salina Street, Suite 100
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City of Syracuse
City Hall, Suite 203
233 East Washington Street
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Steven Kulick, Chair
City of Syracuse Planning Commission
One Park Place
300 South State Street, Suite 700
Syracuse, NY 13202

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Town of Cicero
8236 Brewerton Road
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ENB PUBLISH DATE: 06/25/2025

Town of Clay - Micron New York Semiconductor Manufacturing Project

Notice of Acceptance of Draft EIS and Public Hearing

Onondaga County - The Onondaga County Industrial Development Agency (OCIDA), as joint lead agency with the Creating Helpful Incentives to Produce Semiconductors (CHIPS) Program Office (CPO) created by the United States Department of Commerce, has accepted for public review and comment the Draft Environmental Impact Statement (Draft EIS) for the proposed Micron New York Semiconductor Manufacturing Project. CPO and OCIDA jointly prepared this Draft EIS to evaluate the potential environmental effects of the Proposed Project as required under the National Environmental Policy Act (NEPA) and SEQRA. A copy of the Draft EIS may be viewed on OCIDA's webpage at: <https://ongoved.com/microndeis2025/>.

A paper copy may also be viewed at the office of OCIDA during normal business hours by appointment by using the phone number below. Copies of these documents may also be viewed at the Town of Clay Town Hall and Town of Cicero Municipal Offices as well as the following library during normal business hours:

Onondaga County Public Library
447 South Salina St.
Syracuse, NY 13202

Public comment sessions will be held from 10:00 a.m. to 1:00 p.m.; 2:00 p.m. to 5:00 p.m.; and 6:00 p.m. to 9:00 p.m. on Thursday, July 24, 2025 at the Liverpool High School Auditorium, 4338 Wetzel Road, Liverpool, NY, 13090. Reasonable time limits may be set for each speaker to afford everyone an opportunity to be heard. Equal weight will be given to both oral and written statements. The public comment session will have simultaneous Spanish and American Sign Language interpretation. **To request additional language translation services or special needs assistance, at no charge, please contact OCIDA by 5:00 p.m. July 14, 2025, using the contact information listed below.**

Written comments on the Draft EIS will be accepted by OCIDA and must be submitted by mail or e-mail to the contact listed below until August 11, 2025. Because this is a joint Federal and State Draft EIS, all comments submitted to either OCIDA or CPO will be considered by both agencies. Comments do not need to be submitted to both agencies to be considered. There will be no extension of the comment period.

Micron New York Semiconductor Manufacturing LLC (Micron), a wholly owned subsidiary of Micron Technology, Inc., proposes to construct and operate a semiconductor manufacturing facility with four semiconductor fabrication buildings ("fabs") on an approximately 1,377-acre site consisting primarily of the White Pine Commerce Park (WPCP), principally located at 5171 Route 31, Town of Clay, New York. In total, the Proposed Project would consist of: construction of the Micron Campus at the WPCP, including the four fabs, ancillary support facilities, ingress and egress roads, driveways, and parking; construction of a rail spur and construction material conveyance facility to support construction of the Micron Campus (Rail Spur Site); construction of a childcare center, healthcare center, and recreational center (Childcare Site); and leasing of existing warehouse space in an industrially zoned area at a location to be determined within 20

miles of the Micron Campus (Warehouse Site). The Proposed Project also will require utility and infrastructure improvements to meet its electricity, natural gas, water supply, wastewater, and telecommunications needs (Connected Actions).

The project is located at 5171 Route 31 in the Town of Clay, New York

Contact Information:
Onondaga County Industrial Development Agency
ATTN: Micron Project
335 Montgomery Street, 2nd Floor
Syracuse, New York 13202

Written comments may be submitted jointly to OCIDA and CPO at the above mailing address or via email at: CHIPSNEPA@chips.gov

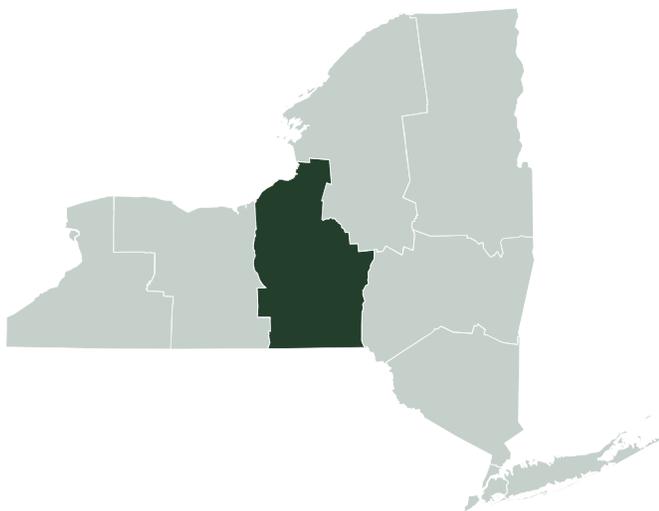
Primary Contact

Robert Petrovich
Onondaga County Industrial Development Agency
335 Montgomery Street, 2nd Floor
Syracuse, NY 13202

Phone: (315) 435-3770
economicdevelopment@ongov.net

This Page Covers

Region 7 - Central New York



Appendix A-5 Response to Comments

Agency Comments

United States Environmental Protection Agency

USEPA Comment 1:

The United States Environmental Protection Agency (“USEPA”) recommended that the Executive Summary should clearly state the purpose and need for the Project, as that information is critical in describing the validity of alternatives.

Response: Chapter 1 sets out the purpose and need for the Proposed Project, which has been further detailed in the FEIS. See FEIS Section 1.1. The Executive Summary also has been updated to further describe the Proposed Project’s purpose and need. See FEIS Section 0.1.

USEPA Comment 2:

USEPA recommended that the criteria by which the commercial viability of the Project is evaluated should be defined in the Introduction of the EIS.

Response: Deciding which applicants may merit funding under the mandates of the CHIPS Act is discretionary with CPO, and is not subject to public review under NEPA.

USEPA Comment 3:

USEPA suggested that the Final EIS identify the anticipated timeline for the additional regulatory requirements including permits and environmental reviews that will be required for the Project and connected actions.

Response: Section 1.4 of the FEIS identifies the permits and other approvals that are anticipated to be needed for the Proposed Project and Connected Actions. The lead agencies, however, cannot predetermine the timeline for permit issuance or other approvals required for the Proposed Project. Notwithstanding, Micron seeks to have all necessary permits and approvals required to start construction during the 2025-2026 tree clearing window.

USEPA Comment 4:

USEPA requested that the alternatives analysis briefly discuss the criteria for the weighing effects of one resource area against another resource and how this weighting was incorporated into impact determinations for the resource areas.

Response: The FEIS’s alternatives analysis did not weigh effects against each other. Language was updated in the FEIS to clarify that when comparing the effects between alternatives, the lead agencies compared the degree of effects on each resource. See FEIS Section 2.2.

USEPA Comment 5:

USEPA requested that the Final EIS provide clear definitions for impact level classifications or criteria used to assess significance of potential impacts for each resource area.

Response: The FEIS has not been revised in response to this comment. Clear definitions are already found in Chapter 3.0 of the FEIS and specific resource chapters under “Summary of Effects.” The FEIS explains the impact criteria for each resource in the discussion of each resource. For example, the Summary of Effects in the Land Use section explains that the development of the Proposed Project and Connected Actions is consistent with applicable zoning and public policies, which is the criteria that was used to identify any significant adverse effects. See also the Summary of Effects in Air Quality, which explains whether the Proposed Project would contribute to the exceedance of any applicable air quality standard established to protect human health; this is the criteria used to establish significant effects within the five-county region. These criteria are specific to each resource area and cannot be effectively defined independently or summarized absent the narrative discussion that precedes the Summary of Effects for each resource area.

USEPA Comment 6:

USEPA recommended creating a section that lists all mitigation measures considered in the Final EIS.

Response: Each resource area includes a summary of all mitigation measures considered by the lead agencies. In addition, Table 3.17-1 details those areas where mitigation measures have been identified and directs the reader, by resource area, to the specific reference in the FEIS.

USEPA Comment 7:

USEPA requested that the information in Table 3.6-1 be revised to reflect a revised annual sulfur dioxide (SO₂) NAAQS standard of 10 ppb.

Response: Table 3.6-1 has been revised in the FEIS.

USEPA Comment 8:

For Mobile Sources, USEPA requested that the Final EIS incorporate a more explicit explanation of the intersections that fail hot spot analyses and what that signifies in Appendix I-3.

Response: There are no intersections that fail the hot spot analyses. See FEIS Table 3.6-16.

USEPA Comment 9:

USEPA suggested the best management practices (BMPs)/mitigation measures for construction equipment include best available control technology as feasible into contract specifications to reduce emissions during construction.

Response: Micron and its third-party contractors will be required to comply with BMPs and permitting requirements. As appropriate, contract specifications will include requirements to comply with applicable BMPs and permitting requirements. The lead agencies will monitor compliance with all construction BMPs/mitigation measures.

USEPA Comment 10:

USEPA recommended including a map of surface hydrology connecting on-site aquatic resources to downstream traditionally navigable waters.

Response: A map depicting the surface hydrology connection between onsite aquatic resources to downstream traditionally navigable waters is include in the FEIS at Figure 3.3-3.

United States Fish and Wildlife Service**USFWS Comment 1:**

The United States Fish and Wildlife Service (“USFWS”) commented that there seems to be a discrepancy between the text in Section 3.3.3.1 of the Draft EIS and Table 3.3-5 (pg. 3-65), which says there are 422.20 federal wetlands on Campus.

Response: The comment is correct that there is a discrepancy because of references to jurisdictional wetlands and a more general reference to total wetlands. For example, FEIS Section 3.3.3.1 refers to 408.61 acres of *delineated federal jurisdictional wetlands* on the Micron Campus that fall under U.S. Army Corps of Engineers (USACE) federal jurisdiction, as verified through Preliminary Jurisdictional Determinations (PJDs) issued in February and October 2024. The 422.20-acre total shown in Table 3.3-5 represents the entire wetland area on the Micron Campus. This total includes:

- 408.61 acres of federal jurisdictional wetlands
- 13.14 acres of non-jurisdictional wetlands
- 0.45 acres of state-jurisdictional wetlands that do not overlap with the federally jurisdictional wetlands

This breakdown clarifies the distinction between federal, state, and non-jurisdictional wetlands and explains how the total acreage was calculated.

USFWS Comment 2:

USFWS recommended that Section 3.4.4, Table 3.4-8 be revised to add a project commitment that forested areas that will remain undisturbed: reference to construction monitor who would monitor invasive plant establishment, if this will be part of the monitor’s scope of work; and under altered composition: consider changing “where feasible” to the “maximum extent practicable.” Native plants should be the default choice.

Response: The commitment and revisions requested in the comment will be included as part of the Landscape Management Plan described in the FEIS Table 3.4-8. Table 3.4-8 has been updated in the FEIS to reflect these requested changes.

USFWS Comment 3:

Regarding the pages 3-118 and 3-120 of the Draft EIS, the USFWS requested that consideration be given to the carrying capacity of the adjacent or nearby habitat these animals might relocate to and give context as to how much habitat is available.

Response: FEIS Section 3.4.4.2 acknowledged the likelihood that some mammals, birds, reptiles, and amphibians will be unable to relocate to suitable alternative habitat and thus may experience reduced fitness and possibly reduced survival. These sections have been revised in the FEIS to reiterate this point and make it clearer that displaced wildlife will be challenged to find habitat elsewhere, particularly in areas that may already be at carrying capacity for their species.

USFWS Comment 4:

USFWS acknowledged that the No Effect determination for the tricolored bat will be revised in the Biological Assessment (BA).

Response: CPO revised the final BA to make a preliminary Endangered Species Act effect determination of “not likely to jeopardize; may affect, likely to adversely affect” for the tricolored bat, and is requesting a conference opinion for the tricolored bat.

USFWS Comment 5:

USFWS requested that the tree clearing commitment on page 3-123 of the Draft EIS be revised to state that “all tree clearing...shall only occur within the winter hibernation window from November 1 through March 31.”

Response: The requested change has been made in the FEIS.

USFWS Comment 6:

USFWS commented that the loss of acreage identified in the Draft EIS for roosting habitat does not align with the BA, which says a total of 727 acres would be lost (which includes all actions; 467 acres for the campus and rail spur site). These acreages should be consistent across all documents. Discuss the remaining 307 acres of forested habitat.

Response: FEIS Section 3.4.4.2 stated that 335 acres of roosting habitat would be lost on the Micron Campus and Rail Spur Site. That figure was incorrect and should be 467 acres, as reported in the BA. The FEIS has been revised accordingly. The forest that will remain outside the Micron Campus LOD and be protected is discussed in the BA (Appendix G-4).

USFWS Comment 7:

USFWS recommended the inclusion of a table similar to Table 11 in the BA.

Response: A table similar to Table 11 in the BA has been added to the FEIS (FEIS Table 3.4-10).

USFWS Comment 8:

USFWS commented that Table 3.4-10 regarding the operational effects on bats was unclear and appears to be inconsistent with the forested (roosting habitat) loss in Table 14 of the BA.

Response: The acreages in FEIS Table 3.4-11 (DEIS Table 3.4-10) do not match Table 14 of the BA because: (1) the BA table combines four categories of forest while the EIS table treats them individually; and (2) the BA table presents the Proposed Project separately from the Connected Actions and transportation improvements, while the EIS table is a combination of the Proposed Project and Connected Actions, and does not include transportation improvements.

USFWS Comment 9:

USFWS requested that Table 3.4-11 be updated with the correct acreages (307 acres of forested habitat will remain) and to reflect the project commitments of the Biological Opinion (BO). USFWS further noted that for BMPs the use of native species should be the default choice.

Response: Comment noted. FEIS Table 3.4-12 (DEIS Table 3.4-11) presents the number of acres of forested habitat that will remain on the Micron Campus (272 acres). The 307 acres referenced in the comment represents the total acreage to remain across the Proposed Project and Connected Actions. Therefore, the table has not been revised in the FEIS.

USFWS Comment 10:

USFWS requested that Table 3.4-12 be updated to be consistent with the BA.

Response: FEIS Table 3.4-13 (DEIS Table 3.4-12) has been revised in the FEIS to be consistent with the BA.

USFWS Comment 11:

USFWS requested that the Draft EIS should acknowledge that, on a regional basis, cumulative impacts to wetlands from the projects listed in Table 4.2-1 are likely to be substantial on downgradient functions and services, despite BMPs and mitigation measures.

Response: FEIS Section 4.3.3 (Cumulative Impacts, Water Resources) evaluates the reasonably foreseeable cumulative impacts from the projects listed in Table 4.2-1 and determined that the proposed transportation upgrades and reasonably foreseeable actions are predicted to result in additional adverse effects on existing wetlands, above and beyond the effects of the Proposed Project and Connected Actions. This evaluation considered if the projects are planned within the same nine sub-watersheds and if construction activities occur at the same time as construction of the Proposed Project and Connected Actions. However, based on the avoidance, minimization, and mitigation measures that would be required as part of the permitting process, jurisdictional wetland losses would be compensated through enhancement, establishment, and/or restoration of

wetlands elsewhere within the watersheds and the protection of existing wetlands would be maximized.

USEFWS Comment 12:

USFWS commented that the increased human activity, noise and light expected from these projects on a regional basis will cumulatively decrease suitable habitat for listed bat species and wildlife overall.

Response: The measures identified in the DEIS and Biological Assessment, that Micron would be required to implement, would avoid, minimize, and mitigate the loss of habitat through a combination of on-site impact avoidance and off-site mitigation. FEIS Section 3.4.5.1 describes Best Management Practices (BMPs) to reduce impacts to biological resources, including retention of onsite roosting and foraging habitat (380 acres that includes approximately 272 acres of nearly contiguous forested roosting and foraging habitat) and use of lighting that minimizes light spillage or trespass beyond intended areas of illumination. Micron will also fund the purchase and installation of 10 roost boxes of appropriate styles and designs selected by USFWS and NYSDEC for Indiana, northern long-eared, and tricolored bats in undisturbed portions of the Micron Campus.

Lighting will be designed to minimize backlight, uplight, and glare, consistent with the Illuminating Engineering Society's BUG rating system and the Town of Clay's lighting code (§140). Construction lighting will be limited to active work areas—unsuitable for bats—and will be directed inward to minimize light trespass into adjacent areas. Construction will end by 10 p.m., further limiting nighttime lighting and noise exposure.

With respect to operational noise, the Micron Campus and Childcare Site would employ noise mitigation measures (e.g., sound attenuators, acoustical louvers, sound walls) to reduce noises generated by outdoor equipment such as rooftop air handlers and cooling fans. Operation of the Rail Spur conveyor would include equipment upgrades to reduce noise, including upgraded pulleys and return idlers, and 1-inch rubber flashing on the hoppers.

Offsite Mitigation Plans proposed by Micron to address the loss of wetlands, surface waters, and associated biological communities, are detailed in Appendix F and Appendix G of the FEIS. The *Off-site Compensatory Mitigation Plan* (Appendix F-7 of the FEIS, Appendix N, Attachment B), implemented through The Wetland Trust, Inc. ("TWT"), will permanently conserve approximately 1,340 acres of upland and wetland habitat across six sites within the Oneida River watershed, including the enhancement, establishment and restoration of 422.14 acres of wetlands and 14,030 linear feet of streams.

Micron has also developed Mitigation Plans to address impacts to biological communities on the Proposed Project site, as detailed in FEIS Appendix G. This includes the purchase and permanent protection of two acres of suitable bat roosting habitat for every one acre of forested area lost due to construction of the Proposed Project and Connected Actions. Based on current estimates, a minimum of approximately 1,182 acres of protected roosting habitat offsite in addition to the approximately 272 undisturbed acres of roosting habitat that will be protected via conservation

easement on the Micron Campus following full buildout, resulting in a total of at least 1,454 permanently protected acres of roosting habitat for Indiana, northern long-eared, and tricolored bats.

Micron and TWT have also proposed to purchase 650 acres of sufficiently high-quality grassland bird habitat for permanent protection and to restore and manage the habitat as grassland for 15 years (in 3-year cycles) to achieve a net conservation benefit.

Micron will sponsor research and monitoring projects recommended by and designed in consultation with USFWS and the NYSDEC, to help improve science-based management and conservation of the Indiana, northern long-eared, and tricolored bat in New York. They include studies of the movement, summer ranges, and distribution of bats on the Syracuse-area landscape, the sensitivity of bats to noise and light, and the response of bats to the Micron Campus' development over time.

New York State Department of Environmental Conservation

NYSDEC Comment 1:

The New York State Department of Environmental Conservation (“NYSDEC”) noted that, in addition to the SEQR-NEPA environmental impact review detailed in the Draft EIS, NYSDEC is evaluating potential environmental impacts through a concurrent review of application materials submitted by the applicants for permits under the Environmental Conservation Law (ECL) which are required for construction and operation of the Micron Project and the Connected Actions.

Response: Comment noted.

NYSDEC Comment 2:

Because the Draft EIS states that bed rock removal may require blasting operations NYSDEC recommended that (1) permanent blasting lines are kept clear of conductive materials such as power circuits, pipes, rails, etc., and ideally maintained at least 20 feet away from power lines; (2) the NYS licensed blaster must follow standard state and federal guidelines, including air blast limits and safe ground vibration levels, which shall be protective for the surrounding structures and residences; and (3) all blasts are monitored by a seismograph.

Response: The blasting plan has been revised. See FEIS Appendix E-5, Micron Blasting Plan, Sections 7.1, 7.2, and 7.6. Should blasting be required as a last resort, Micron will comply with NYSDEC's recommendations.

NYSDEC Comment 3:

Because Micron's wetlands mitigation plans included in the Draft EIS continued to be refined with agency input, NYSDEC recommended that the Final EIS contain the final wetland mitigation plans if there are updates or site plan adjustments.

Response: As of the date of the FEIS, the wetlands mitigation plans are not yet final. The final wetlands mitigation plan will be made public once adopted as part of the USACE and NYSDEC permitting for the Proposed Project.

NYSDEC Comment 4:

NYSDEC noted that Micron and the Rail Spur operator are required to gain coverage under NYSDEC's Construction General Stormwater Permit, GP-0-25-001 (CGP), which requires developing a Stormwater Pollution Preventions Plan (SWPPP) that includes the implementation of practices to protect water quality and to reduce future flooding risks associated with the Project.

Response: Micron and the Rail Spur operator will be required to obtain coverage under NYSDEC's Construction General Stormwater Permit, GP-0-25-001 (CGP), which includes the development and implementation of SWPPPs.

NYSDEC Comment 5:

NYSDEC commented that it and the Town of Clay will be completing a joint review to ensure that the SWPPP meets NYSDEC technical standards and the requirements of the CGP. NYSDEC also recommended that the Micron and Rail Spur SWPPP be appended to the final EIS, if available at the time of publication.

Response: As of the date of the FEIS, the SWPPPs for the Rail Spur Site and Micron Campus are not yet final. To provide additional disclosure, a draft version of the SWPPP document for the first phase of the Micron Campus as submitted to NYSDEC and the Town of Clay has been included as Appendix F-8 of the FEIS. Both the final SWPPPs for the Micron Campus and the Rail Spur Site will be made public as part of the NYSDEC and Town of Clay's review.

NYSDEC Comment 6:

NYSDEC confirmed that it will be completing routine site inspections to ensure CGP permit compliance during project construction.

Response: Comment noted.

NYSDEC Comment 7:

NYSDEC noted that, to accommodate the increase in the flowrate and the associated organic/inorganic loadings to the existing Oak Orchard Waste Water Treatment Plant ("OOWWTP"), Onondaga County will submit an NY-2A application to NYSDEC for modification of the current OOWWTP State Pollution Discharge Elimination System (SPDES) permit, which will include a chemical characterization of the wastewater from all existing and new sources that the expanded facility is expected to receive and treat. NYSDEC further notes that the wastewater characterization will include the mixture of any emerging contaminants that are assumed to be contained within the discharge from new industrial sources.

Response: Comment noted.

NYSDEC Comment 8:

NYSDEC will continue to work closely with Onondaga County and Micron in the development and review of the SPDES permit modification to maintain New York State's high water quality standards.

Response: The lead agencies recognize NYSDEC's jurisdiction to review OOWWTP's application for a SPDES permit modification and acknowledge that the required permit review and modification will be granted based on the OOWWTP meeting applicable New York State water quality standards.

NYSDEC Comment 9:

NYSDEC recommends including any updates to the OOWWTP upgrade plans to the FEIS, as necessary and if available.

Response: The layout and plans for the OOWWTP are still being designed within the limits of disturbance as shown on Figure 2.1-16. The limits of disturbance have not changed for the IWWTP. Review of the municipal upgrades and associated plans is covered under separate SEQRA review.

NYSDEC Comment 10:

NYSDEC commented that the Draft EIS was published prior to the publication of Micron's Climate Leadership and Community Protection Act (CLCPA) Analysis, which NYSDEC publicly noticed as part of its permitting process, and noted that a finer level of detail was included in the CLCPA Analysis than is presently in the Draft EIS.

Response: See Response to Climate Change/GHG Comment 14. The lead agencies acknowledge the timing and note that the analysis required under the Climate Leadership and Community Protection Act (CLCPA) will contain greater detail than the discussion of the CLCPA in the FEIS given the differences between SEQRA and the CLCPA. Notwithstanding, the FEIS comprehensively reviews and assesses the Proposed Project's reasonably foreseeable GHG impacts. Any difference in detail between the FEIS and the CLCPA Analysis would not materially alter the extent of the Proposed Project's GHG impacts. See also FEIS Section 3.7.3.2.

NYSDEC Comment 11:

NYSDEC recommended that the FEIS incorporate the latest greenhouse gas emissions data and information available to ensure consistency amongst the permitting documents and related CLCPA Analysis.

Response: See Response to NYSDEC Comment 10 and Climate Change/GHG Comment 14. The FEIS provides a thorough and comprehensive review of environmental effects, including greenhouse gas emissions. Pursuant to Section 7(2) of the CLCPA, and as discussed in FEIS Section 3.7.1.3, NYSDEC will review Micron's CLCPA analysis as part of its processing of

NYSDEC permits and determine whether the Proposed Project would be inconsistent with or interfere with the attainment of the statewide GHG emission limits in ECL Article 75, and if it determines that it would, whether it is otherwise justified and determine feasible mitigation measures to be required

The lead agencies have appended the current draft CLCPA Analysis to the FEIS as Appendix J-2. It is anticipated that this document remains subject to change as part of the NYSDEC permitting process.

NYSDEC Comment 12:

NYSDEC noted that the scope and complexity of the potential impacts associated with the Micron Project require a thorough and comprehensive review of environmental, social, and economic factors.

Response: The FEIS evaluates the reasonably foreseeable environmental impacts of the Proposed Project and Connected Actions and considers mitigation measures that would reduce or avoid otherwise significant impacts as required by NEPA and SEQRA. The FEIS satisfies the legal standards under all applicable regulatory regimes.

NYSDEC Comment 13:

NYSDEC stated that it will continue to work with the applicants and the other local, state, and federal agencies as necessary to further address potential environmental impacts of construction and operation of the Micron Project throughout the permitting process.

Response: Comment noted.

New York State Department of Transportation

NYSDOT Comment 1:

The New York State Department of Transportation (NYSDOT) acknowledged the assessment of potential transportation improvements on state-owned roadways and the transportation recommendations identified in the Draft EIS.

Response: Comment noted.

NYSDOT Comment 2:

NYSDOT noted that, as part of a separate environmental review and in coordination with FHWA, it will further study the improvements that are needed to the state transportation network and that the improvements studied in this separate review may differ from what is presented in the Micron DEIS.

Response: The lead agencies acknowledge that the NYSDOT, in coordination with FHWA, will conduct its own study of potential transportation improvements on state-owned roadways.

NYSDOT and the other agencies with jurisdiction over authorization of transportation improvements, which do not include CPO or OCIDA, will fully assess potential transportation improvements to ensure that the traffic impacts of the Preferred Action Alternative are mitigated to the maximum extent practicable. As part of this, NYSDOT will also consider the environmental impacts that may be associated with the transportation improvements NYSDOT would be considering approving or implementing.

As noted in the comment, for purposes of the FEIS, the lead agencies included recommended mitigation measures that, if implemented, would substantially mitigate the significant adverse traffic impacts of the Preferred Action Alternative. See FEIS Section 3.11.5.

NYSDOT Comment 3:

NYSDOT expressed its appreciation for the coordination and noted that it will continue to work with OCIDA as the Micron Project progresses.

Response: Comment noted.

Empire State Development

Empire State Development Comment 1:

The Empire State Development (ESD) noted that Micron's \$100 billion investment in Central New York will bring transformative growth to the region and has the potential to reshape the economic trajectory of the entire state. This unprecedented investment was made possible by New York's Green CHIPS Program, championed and signed into law by Governor Hochul and overseen by ESD.

Response: Comment noted.

Empire State Development Comment 2:

ESD noted that Micron and Governor Hochul signed a Community Investment Framework in October 2022. In the agreement, Micron and New York State made strong commitments to community and sustainability, including: (1) establishment of a \$500 million Community Investment Fund (CIF) and the creation of a Community Engagement Committee made up of local stakeholders working with Micron to support ongoing community engagement, help to recommend community investment grants to be made from Micron's contribution to the Green CHIPS CIF, and support implementation framework and monitoring of the overall and subsequent Green CHIPS Community Plan between Micron and ESD; (2) a commitment to volunteering and giving in Central New York communities; and (3) Micron agreed to set diverse hiring and contracting goals, sustainability requirements, and other community investments.

Response: Comment noted.

Empire State Development Comment 3:

ESD provided information on the extensive public engagement by the CEC with Central New Yorkers for development of its Community Priorities Document published in June 2024. The Community Priorities Document represents a critical strategic framework to help guide the \$500 million Green CHIPS CIF towards the community's most pressing needs and aspirations and is designed to be spent over the course of the next two decades.

Response: Appendix R, Environmental Justice, of the FEIS has been edited to reflect this information.

Empire State Development Comment 4:

ESD provided information on the diverse contracting goals set in the CIF agreed to by Micron and New York State, as well as diverse hiring and workforce development.

Response: Appendix R, Environmental Justice, of the FEIS has been edited to reflect this information.

Empire State Development Comment 5:

ESD provided information on the recent efforts by New York State and ESD to ensure that the region can sustain induced growth from the Micron project while preserving its most

Response: Appendix R, Environmental Justice, of the FEIS has been edited to reflect this information.

County of Oswego

Oswego Comment 1:

Oswego County supports investment in Central New York and the attendant economic drivers, jobs and opportunities investment can bring to the region.

Response: Comment noted.

Oswego Comment 2:

Oswego County commented that it and its local jurisdictions in proximity to the project were not listed as interested or involved agencies. Oswego County commented that the Draft EIS process was cloaked in secrecy and that information to, and input from, Oswego County was required.

Response: The lead agencies are not aware of any necessary approvals by Oswego County or any local jurisdiction within Oswego County required for the Proposed Project or any Connected

Action. As such, Oswego County and its local jurisdictions are neither an interested agency nor an involved agency. *See* 6 NYCRR 617.2(t), (u).

The FEIS process has not been cloaked in secrecy. See Responses to Public Review Comments 2 and 3 (detailing the extensive opportunities provided over the years for input into the WPCP and Proposed Project decision making process, including comment on the DIES). Oswego County has been able to submit its comments during the public comment period.

Oswego Comment 3:

No agencies are listed as needing to provide permits, approvals, or consultations for the identified mitigation measures including wetland/habitat construction, roadway reconstruction, etc.

Response: The comment does not accurately reflect the FEIS. For example, the FEIS appropriately identifies the NYSDOT as the agency with jurisdiction over the necessary traffic mitigation. To the extent that the comment suggests that Oswego County or one of its jurisdictions have approval jurisdiction over the wetland mitigation or habitat construction, the comment is incorrect. The proposed mitigation does not require any local approvals.

Oswego Comment 4:

There has been insufficient review of the impacts of the proposed wetlands mitigation as it concerns Oswego County and that there has been insufficient notice to and/or involvement of impacted jurisdictions within Oswego County.

Response: Landowners associated with the proposed mitigation plans have been notified of the planned wetland restoration activities and have agreed to the long-term protection measures and legal obligations related to these resources. Micron has been required to develop mitigation plans to address the anticipated loss of wetlands and surface waters (see FEIS Appendix F), as well as the associated biological communities (FEIS Appendix G). The lead agencies note that these plans comply with all applicable regulations under the Clean Water Act and Article 24 of the New York State Environmental Conservation Law, ensuring mitigation for both federal and state jurisdictional wetlands and surface waters. Additionally, all impacts to biological resources will be mitigated in consultation with the U.S. Fish and Wildlife Service (USFWS) and in accordance with the Endangered Species Act (ESA).

See also Response to Oswego Comment 2. Notwithstanding, Micron will be required to continue to engage with Oswego County and local municipalities within Oswego County, where appropriate. This will include direct outreach to relevant government stakeholders to address questions and concerns.

Oswego Comment 5:

The removal of viable agricultural lands from production, and their conversion into permanent wetlands, harms the agriculture sector in Oswego County.

Response: The proposed mitigation sites are located on privately held lands for which the landowners have agreed to transfer ownership of the lands and thus no longer use the land for agriculture. Furthermore, many of these areas were historically wetlands prior to colonial development in the 1700s. Over thousands of years, these landscapes accumulated rich organic soils and siltation from periodic flooding, making them highly productive for agriculture once they were converted from wetlands. The restoration of these lands to their original ecological function not only supports long-term environmental resilience but also aligns with broader conservation goals.

In FEIS Section 3.1.3, the lead agencies considered the Proposed Project's and the Connected Actions' (including components in Oswego County) anticipated effects on farmland conversion. See also FEIS Appendix D, Land Use, Zoning, and Public Policy. As stated in the FEIS, the NRCS conducted a land evaluation and site assessment and determined that several Proposed Project and Connected Action components would be exempt from FPPA provisions because they would occur in existing urbanized areas, utility corridors, rights-of-way, or already converted areas. NRCS rating forms document scores below 160 for all sites – no further action under FPPA is necessary. See FEIS Section 3.1.3.2, Operational Effects, Appendix D-4. The FEIS also states that Micron and the agencies responsible for the Connected Actions would be required to follow applicable requirements and notification procedures per Article 25-AA of the New York State Agricultural and Markets Law.

As noted in FEIS Section 3.1.2.2 Existing Utility Property and FEIS Section 3.1.2.3 Protected Farmland, Connected Actions associated with the Proposed Project within Oswego County may occur on lands classified by the NRCS as farmland and, in some instances, may necessitate easements on these lands. However, these easements are limited in scope: most infrastructure involved is underground, minimizing long-term impacts on farming activities. FEIS Section 3.4.3, Affected Environment further notes that, while Connected Actions may temporarily disturb a mix of land cover types, including approximately 26 acres of active cropland, most of the construction disturbance would take place in previously developed or disturbed areas. Any temporary impacts to cropland or other land cover types would be mitigated through regrading and revegetation following construction, ensuring that the long-term viability of farmland is preserved to the greatest extent practicable. See also Response to Oswego Comment 13.

Oswego Comment 6:

The proposed wetlands mitigation also hinders any possible future development of these lands for housing or other uses and would remove acreage from the taxable portion of the rolls. There are no plans in the Draft EIS regarding host community benefits in Oswego County for the potential losses.

Response: See Response to Oswego Comment 5. The proposed mitigation is consistent with the conservation objectives outlined in the Oswego County Comprehensive Plan and supported by the

Oswego County Soil and Water Conservation District. These objectives emphasize the protection of ecological zones, enhancement of water quality, and restoration of natural habitats—including wetlands—as part of a broader strategy for environmental sustainability and climate resilience.

While concerns have been raised regarding the potential loss of future development opportunities and taxable acreage, it is important to note that purely economic impacts are beyond the scope of NEPA and SEQRA. Removing lands from the taxable base is at the sole discretion of the private landowners through the voluntary placement of conservation easements on these mitigation sites. These easements are intended to preserve the restored wetlands in perpetuity, ensuring long-term ecological benefits while balancing the need for future land development.

While the mitigation sites are not part of the primary development footprint, Micron will continue to coordinate with regional stakeholders and explore opportunities to support broader community benefits, which may include environmental education, conservation partnerships, and potential ecosystem service valuation efforts that may help offset perceived losses.

Oswego Comment 7:

The Draft EIS should have employed wetland mitigation measures and considered reasonable alternatives within Onondaga County, and within the same watershed, for the Project instead of pursuing them in other areas.

Response: The FEIS evaluated the scope of impacts associated with the Proposed Project, whether such impacts could be avoided or required mitigation and, whether mitigation was feasible. As discussed in FEIS Section 3.3.5 and Appendix F-7, Micron will undertake mitigation across six mitigation sites located within a 9-mile distance of the WPCP. This approach is consistent with federal and state regulatory guidance and reflects a deliberate effort to prioritize proximity and ecological relevance. Additionally, mitigation sites were selected to preserve and restore lands that were likely historically wetlands prior to agricultural conversion, aligning with Oswego County's conservation goals.

The FEIS also recognizes the extent of mitigation required to offset the unavoidable impacts to wetlands, and acknowledges that the USACE and NYSDEC, using their technical expertise and jurisdiction, evaluated reasonable wetland mitigation, including the location of such mitigation, and have tentatively determined the nature, extent, and location of appropriate mitigation.

The mitigation sites are all located within the same watershed as the Proposed Project (see Appendix F-7, Figure 1-1) and were selected based on ecological suitability and regulatory criteria outlined in Section 2.1 of the Mitigation Plan (FEIS Appendix F). Key factors included hydrologic conditions, watershed-scale features, compatibility with adjacent land uses, and alignment with watershed management plans, as required under 33 CFR 332.2(d). The site selection process began within the 12-digit Hydrologic Unit Code (HUC 041402020905) containing the proposed Micron Campus, then expanded to the 10-digit HUC (0414020209), followed by four Onondaga County townships—Clay, Cicero, Lysander, and Van Buren—and finally into the southern portion of Oswego County. Ultimately, all mitigation sites were secured within the 12- or 10-digit HUC, ensuring they remain within the same watershed as the Project (see FEIS Appendix F-7, Figure 1-1).

Prior to final selection, all sites were pre-screened by regulatory agencies to ensure suitability. Sites were prioritized that could provide a net wetland gain—defined by the USACE as established or re-established wetlands, and by NYSDEC as restored wetlands. The Wetland Trust (TWT) was able to meet these criteria, with 94 percent of the compensation developed as re-established/restored wetlands and the remaining 6 percent as rehabilitation/enhancement. Mitigation sites were chosen to replicate the frequency and types of wetlands impacted by the Project, using classification systems from Cowardin et al. (1979) and Edinger et al. (2014). The goal was to match physical, chemical, and biological functions between the impacted and restored ecosystems, with final wetland credit targets determined by regulatory agencies.

Sites also offer sufficient stream restoration potential to meet agency compensation needs and allow for integrated stream-wetland restoration within functioning ecological complexes. Each site was analyzed for existing wetlands to be avoided, soil characteristics conducive to wetland development (e.g., soil moisture, depth to groundwater), and topography.

Priority was given to sites closer to the Micron Campus, within the same watershed, and to larger parcels capable of supporting similar ecological functions—such as flood attenuation, groundwater recharge, stormwater infiltration, wildlife habitat, habitat connectivity, carbon sequestration, and long-term sustainability.

Oswego Comment 8:

The Draft EIS review is inadequate to the extent the Project relies upon other counties for solid waste disposal. Any reliance on Oswego County's solid waste system is misplaced.

Response: The FEIS first ensures that appropriate waste avoidance and minimization measures have been considered and employed where feasible. It then evaluates capacity for the disposal of solid waste associated with the Proposed Project. The FEIS does not rely upon disposal of municipal solid waste outside Onondaga County for the Micron Project. As outlined in FEIS Section 3.8, Onondaga County requires all municipal solid waste to be sent to the Onondaga County Resource Recovery Agency (OCRRA). However, as part of the FEIS analysis of induced growth and specifically household growth and impacts on municipal solid waste, the FEIS projects household growth in neighboring counties including Oswego County and the capacity of landfills in neighboring counties to address the projected increase in municipal solid waste within each county.

Oswego Comment 9:

The Draft EIS lacks information regarding potential impacts upon rivers within Oswego County as the discharge from new wastewater facilities in Onondaga County ultimately will end up in waterways in Oswego County.

Response: The FEIS concludes that discharge from wastewater facilities in Onondaga County are not anticipated to have any significant environmental effects in Onondaga County. See FEIS Sections 3.3 and 3.3.5; Figure F-2. The same would be true for Oswego County such that the lead agencies do not anticipate that any discharge from wastewater facilities in Onondaga County would have a significant environmental impact on the Oswego River.

Discharge of chemical constituents from industrial activities is strictly regulated through OCDWEP's EPA-approved Industrial Pretreatment Project, industrial wastewater discharge permits, and New York State's SPDES permitting process. Wastewater generated at the Micron Campus will first be treated onsite at a preliminary wastewater treatment plant. As described in FEIS Section 3.3.4.2, industrial wastewater not reused onsite will be conveyed to the Industrial Wastewater Treatment Plant (IWWTP) at the Oak Orchard site for further treatment.

Oswego Comment 10:

Many migratory waterfowl stop in Oswego County and this county believes that further study of the potential impacts of the Project within Oswego County is warranted to ensure there are no adverse impacts on rare or state-listed avian species and fish stocks.

Response: Oswego County's concern regarding potential impacts to migratory waterfowl, rare or state-listed avian species, and fish stocks is acknowledged. FEIS Section 3.4.5.1 outlines BMPs to protect threatened and endangered species, including timing restrictions for tree clearing, retention of roosting and foraging habitat, and coordination with the U.S. Fish and Wildlife Service under the Endangered Species Act (ESA). See FEIS Table 3.4-11. For example, the "Lighting Reduction" activity states that all nighttime exterior lighting at the Micron Campus would be designed to minimize light spillage or trespass beyond intended areas of illumination. Lighting fixtures will be designed, where feasible, to meet the highest LEED standards for minimizing backlight, uplight, and glare—with a focus on achieving near-zero uplighting. This includes the use of warm white LEDs and cut-off optics to reduce light pollution, which can disrupt migratory patterns and behavior of nocturnal and sensitive bird species.

The lead agencies will also require Micron to engage in ongoing consultation with regulatory agencies and regional stakeholders to ensure that sensitive ecological resources—including migratory birds and aquatic species—are considered and protected throughout the development process.

Oswego Comment 11:

Oswego County is concerned about potential increases in contaminants from the Micron Project such as PFAS, increases in water temperatures and decreases in overall water quality.

Response: As detailed in FEIS Section 3.3.4.2, Micron, National Grid, OCWA, and OCDWEP would implement stormwater BMPs during construction of the Proposed Project and Connected Actions. These BMPs are specifically designed to reduce stormwater runoff rates, minimize erosion and sedimentation, and prevent contamination of surface waters.

To address concerns about water quality and degradation of aquatic ecosystems—stormwater management areas would be designed in accordance with the New York State Stormwater Management Design Manual (NYSDEC, 2024) and the New York State Standards and Specifications for Erosion and Sediment Control (NYSDEC, 2016). These standards are intended

to protect waters of the State from adverse impacts associated with construction runoff and ensure no downgradient increases in stormwater quantity or pollutant loading occur.

All BMPs will be documented in site-specific Stormwater Pollution Prevention Plans (SWPPPs) and subject to regulatory oversight. See Appendix F-8 Draft Micron Campus Phase 1a SWPPP. Additionally, Micron will continue to work with relevant agencies to ensure that water quality protections remain effective and responsive to emerging concerns, including those raised by Oswego County.

Information concerning PFAS is ever evolving. Notwithstanding, the FEIS provides a robust discussion of the identification, use and management of PFAS associated with the Proposed Project. The FEIS also addresses, to the extent known today, the potential risks and procedural controls in place to manage the risk associated with chemicals that will be used. A new appendix L-1 has been included in the FEIS which further discusses PFAS and related concerns about these chemicals.

Micron will be required to obtain a discharge permit from OCDWEP which will establish specific PFAS limits on the discharge of wastewater to the IWWTP. To meet these limits, Micron will segregate and pretreat PFAS on site prior to any discharge to the IWWTP. FEIS Section 3.8.3.2 and Appendix L-1 discuss PFAS wastewater treatment technologies that exist and that are in the process of development. Because of the evolving nature of PFAS and treatment technologies, Micron will continue to assess emerging PFAS wastewater technologies capable of addressing PFAS at the ppt levels found in semiconductor fabrication wastewater and that will meet limits specified in the Micron Campus's wastewater discharge permit.

In addition, PFAS will be addressed cumulatively by the other regulatory controls, including appropriate storage and handling of chemicals, and spill prevention planning, as discussed in the FEIS. Micron will also be required to comply with all existing PFAS regulatory requirements as well as all future regulations as applicable to its handling, use and disposal of PFAS. Finally, Micron will continue to evaluate feasible alternatives to the use of PFAS based on market availability and consistent with operational safety needs and other considerations, as well as new and emerging detection and pretreatment methods as they become available.

Oswego Comment 12:

Oswego County questioned whether OCIDA undertook the required hard look at all reasonable alternatives to the Project.

Response: Building upon its development of the WPCP related environmental reviews, OCIDA considered and evaluated the reasonable alternatives that are feasible, considering the objectives and capabilities of Micron as well as the "no action" alternative. See FEIS Section 2.2. Further, because the FEIS was prepared in accordance with NEPA in addition to SEQRA, the alternatives review went farther than required under SEQRA by considering other alternatives.

Oswego Comment 13:

Oswego County commented that the Draft EIS failed to consider the impacts to farmland in Oswego County.

Response: See Response to Oswego Comment 5. The FEIS fully considers the impacts to farmland where the Proposed Project would directly or indirectly convert prime farmland and farmland of statewide importance to industrial and commercial uses. The FEIS found that, because the Proposed Project and Connected Actions would have limited to no effect on any existing or likely future agricultural uses on the properties where they would be built, farmland conversion under the Preferred Action Alternative would not result in any significant adverse direct effects on agricultural land uses. See FEIS Section 3.1.3.2.

Indirect effects, including potential growth-induced effects on farmland, are expected to be subject to local planning, discretionary approvals, and applicable measures to avoid or minimize adverse development effects, and therefore are not expected to result in significant adverse impacts to farmland.

Oswego Comment 14:

Oswego County commented that the TIS failed to address traffic impacts in Oswego County or consider necessary traffic mitigation.

Response: The transportation evaluation area was established in consultation with NYSDOT. The geographic extent of analysis was defined by where the Proposed Project has the potential to result in a significant adverse transportation impact. This approximately 5-mile radius boundary was supported by detailed corridor capacity analysis and assessments, and anticipated changes in projected traffic patterns, connectivity, and land use. NYS Route 481 and I-81 freeway operations were considered just south of Oswego County's southern boundary. See FEIS Appendix M.

Oswego Comment 15:

The Draft EIS does not discuss the environmental impacts of the proposed traffic mitigation measures. It does not reference the adverse impact on local authorities who must mitigate local roads for the increased traffic and differing traffic patterns.

Response: The recommended traffic mitigation measures identified in the FEIS are subject to the jurisdiction of federal and state agencies other than the lead agencies, and those measures will be further studied by those agencies. It is anticipated that an environmental analysis will be prepared by those agencies. As part of this review by those agencies, the reasonably foreseeable adverse environmental impacts associated with the traffic mitigation measures selected will be evaluated. Notwithstanding, to the extent reasonably foreseeable, the potential adverse environmental impacts of the proposed traffic mitigation are identified and evaluated in FEIS Chapter 4.0.

Oswego Comment 16:

The impacts on community character from induced growth, both near the proposed site and in Oswego County are not addressed.

Response: In FEIS Section 3.13.4.2, the lead agencies evaluated how growth induced by the Preferred Action Alternative would gradually bring substantial changes to local communities and the wider five-county region, including Oswego County. The FEIS anticipates that population increases, and higher-density residential, commercial, and industrial development could change community character over time. See FEIS Appendix C. The FEIS acknowledges that the precise nature and exact location of future development from induced growth is not yet known. The FEIS further notes that all new developments and any changes in community character would require discretionary approvals from appropriate government authorities, and occur in accordance with local land use regulations, polices, and plans. See FEIS Section 3.13.4.

Oswego Comment 17:

The study area for induced job growth includes Oswego, Onondaga, Cayuga, Madison and Cortland Counties, but failed to include Oneida County. Growth inducing effects in Oneida County should be examined, as it is less than a 30 minute drive from Micron, is rural in nature and has room for residential growth.

Response: The 2022 ESD sponsored study prepared by Regional Economic Models, Inc. (REMI) (the “REMI Study”) is included as FEIS Appendix C-2. As described in the Methodology section, the REMI Study uses ESD’s multi-region, 70-industry Tax-PI v2.5 model of New York. As described in Appendix C-1 (Growth Inducing Effects), according to the REMI Study, 85 percent of induced job growth and 90 percent of induced residential growth from Micron establishing a four-fab semiconductor manufacturing facility in Onondaga County would occur within the five-county region. Therefore, this five-county region was selected as the study area for analyzing growth inducing effects in this FEIS. Appendix C-1 also notes that, in general, although locations beyond the five-county region could experience some induced growth, such growth would likely be more limited in nature than that in the five-county region and would not occur at a scale that would be anticipated to result in significant adverse environmental effects.

Oswego Comment 18:

The Draft EIS fails to consider the changes in density patterns and resulting environmental impacts associated with induced growth.

Response: The FEIS considers the reasonably foreseeable impacts of induced growth as part of every resource area chapter. The FEIS also evaluates reasonably foreseeable population growth and workforce in-migration in the local and regional study areas. Predicting the exact locations where Micron workers may reside and resulting population densities is inherently speculative and beyond the scope of the FEIS. FEIS Appendix C presents the Growth Inducing Effects study area, methodology, and evaluation methods, including induced growth projections by town, city, and county. As explained there, the specific locations or density patterns of induced development cannot be predicted at this time with any degree of reasonable certainty due to local zoning, site plan approvals, and other discretionary actions. Notwithstanding, the FEIS provides reasonable

assumptions regarding worker residence patterns to inform assessments of housing demand, infrastructure capacity, and community services, ensuring a sufficient basis for evaluating reasonably foreseeable environmental and socioeconomic effects.

Oswego Comment 19:

The Draft EIS does not speak to the potential water and wastewater impacts of the Connected Actions or growth inducing effects.

Response: FEIS Section 3.3 evaluates reasonably foreseeable water and wastewater impacts associated with both the Proposed Project and Connected Actions under the Preferred Action Alternative, including those related to growth inducing effects. Under the Preferred Action Alternative, construction of the Proposed Project and Connected Actions would result in significant adverse effects on wetlands and surface water but would not result in significant adverse effects from stormwater, or on groundwater, floodplains, or coastal resources. The Preferred Action Alternative could have growth inducing effects on wetlands and surface water in the five-county region over time; however, these changes would be gradual and would require independent discretionary approvals and analysis from relevant authorities.

Oswego Comment 20:

Oswego County questioned why Micron has proposed a sewage leach field at the Childcare site given the assumption that the site would be connected to public wastewater utilities.

Response: The Childcare Site would not connect to public wastewater utilities because such services are not available at the site. Adding a connection to the public wastewater utility lines would have required running an additional line and there is space on the childcare site for septic while minimizing adverse impacts to any wetland or habitat impact. As stated in FEIS Section 2.1.3, each building at the Childcare Site would be equipped with its own septic tank and pump station, with sanitary wastewater directed via piping to a sewage disposal system and leaching field.

Oswego Comment 21:

Oswego County commented that the land use study area was too small and failed to adequately analyze growth inducing impacts on land use.

Response: The study area was identified in the Draft Scope, which was made publicly available for comment. Oswego County did not question the sufficiency of the study area during that time. See 6 NYCRR §§ 617.8(f), (g).

The land use study area for analyzing growth-inducing effects was selected based on the 2022 REMI Study, which indicates that most of the induced growth resulting due to the Preferred Action Alternative would occur within the five-county region. See FEIS Appendix C-2. Based on this analysis, the five-county region provides sufficient study area for assessing reasonably foreseeable growth-inducing effects on land use. While some growth could occur beyond this region, it would

likely be limited in scale and not expected to result in significant adverse environmental effects. See also FEIS Appendix D-1.

The study area for the Proposed Project includes the Micron Campus, the Rail Spur Site, and the Childcare Site, as well as the area within a one-mile radius surrounding the Micron Campus and the Rail Spur Site and a ¼-mile radius surrounding the Childcare Site, as shown in Figure 3.1-1. These study area limits represent a conservative estimate of the broader area potentially susceptible to land use changes from the Proposed Project. The build-out of the Micron Campus and the Rail Spur Site would create industrial uses in an area generally surrounded by vacant land, residential uses, and agricultural land. Therefore, the 1-mile radius around the Micron Campus and the Rail Spur Site represents the area that would be most likely to experience potential adverse effects from the manufacturing and industrial activities on those sites, such as noise and vibration effects from construction activities and the effects of increased traffic.

The Childcare Site would include childcare, medical, and recreational uses more common in residential and commercial areas with more limited potential to disturb adjacent properties. Therefore, the ¼-mile radius was selected based on the lower likelihood of potential adverse effects from that site to extend beyond that distance. The land use study area also encompasses the Connected Actions (electricity, natural gas, telecommunications, water, wastewater, and utility improvements; see FEIS Table 3.1-3. The Connected Actions would include upgrades to existing utility properties and certain linear infrastructure located primarily in existing rights-of-way and easements that would be unlikely to generate noticeable post-construction effects beyond the utility boundaries. Therefore, the study area for the Connected Actions is limited to the extent of the new utilities and improvements upon build-out but considers any potential effects on surrounding properties, including privately owned parcels along utility easement areas.

Oswego Comment 22:

Oswego County questioned why the 2022 REMI Study found that 85% of induced job growth and 90% of induced residential growth will occur in the 5-county region including Oswego.

Response: The 2022 REMI Study and its findings are located in FEIS Appendix C-2. As noted in the Methodology section (REMI Study, p. 9), REMI uses Empire State Development's multi-region, 70-industry Tax-PI v2.5 model of New York. Oswego County is in the Central New York five-county model region. The study presents that 85% of induced job growth and 90% of induced residential growth reflect growth projected within this predefined model region, which defines the geographic scope of the analysis. See also Response to Oswego County Comment 17.

Oswego Comment 23:

Oswego County commented that the anticipated population growth is not consistent with the REMI report.

Response: FEIS Appendix C-1 explains that, to provide a more granular analysis of growth inducing effects at the community level, local planning data compiled by the Syracuse Metropolitan Transportation Authority (SMTA) was used to develop a model of induced

household growth at the town, city, and county levels. This analysis, presented in the appendix, aligns with values presented in FEIS Section 3.1.

Oswego Comment 24:

The Draft EIS should address substantial housing impacts upon local municipalities, including in Oswego County. The Project will cause short-term challenges in the local and regional housing markets and, in turn, will require additional municipal investment in infrastructure which will outpace existing municipal plans, budgets/capital projects for repaving, bridge replacement, etc.

Response: Section 3.15.3.2 of the FEIS projects induced household growth for municipalities in Oswego County and considers whether such growth could lead to significant adverse impacts due to increased housing costs and/or increases in the cost of municipal services. The analysis finds that the potential for significant adverse impacts due to increased housing costs would be limited to the primary study area (i.e., within the Towns of Clay and Cicero) and would be short-term in duration. While there would be rent pressures attributable to the Proposed Project's induced growth in markets beyond the local study area, the projected growth within regional communities is more dispersed, and in larger part attributable to non-Micron induced growth that would gradually occur, allowing time for regional markets to respond to the increased demand through new housing production.

While some municipalities and school districts could experience increases in costs associated with the Proposed Project's induced growth, new property taxes and other revenues generated by induced growth would avoid shortfalls in budgets that require significant increases in tax rates and/or the diminishment of public services. The REMI Study projects that construction and operations of a 4-fab facility would generate nearly \$500 million annually in local government revenues for municipalities within the region. See FEIS Appendix C-2, Table 2.6a; see also response to Oswego Comment 25.

Oswego Comment 25:

The increased demand for housing and increased rent is not a temporary impact.

Response: Although the Proposed Project is large enough to alter market conditions in the regional study area, housing demand and resulting changes in rents are influenced by broad market dynamics. Market movements cannot be predicted with certainty. However, an increase in housing demand does not necessarily mean that increased rents are permanent within a geography. For certain geographies, an increase in demand can result in more housing units being brought online or newly constructed housing, leading to controlled increases in rent, if not comparable rental rates once market absorption has taken place. Areas which are highly desirable to the incoming populations may see larger rent and home price increases; different communities may experience these increases at different temporal scales, although the property market should be expected to react to the new demand within approximately four years. According to the United States Census Bureau (USCB) Residential Construction Survey (Northeastern region) data and an affordability assessment conducted in November of 2023 by JP Morgan, four years is a conservative estimate

for a market reaction and an effective decrease in housing prices. Tertiary factors may accelerate or decelerate this market reaction.

As detailed in FEIS Appendix Q, the real estate market in the Central New York region has stagnated in recent years with vacancies outpacing unit construction. According to American Community Survey (ACS) 2019-2023 5-Year Estimates, Oswego County has 7,565 vacant housing units. As discussed in FEIS Section 3.15.3.2, certain real estate markets throughout the region have struggled with deferred maintenance spurred on by low housing demand, which has resulted in low rents. Oswego County rental rates saw an inflation adjusted 1 percent increase in median gross rents since 2010 (see Appendix Q, Table Q-38). The presence of higher housing demand would be likely to bring online a portion of the over 7,500 vacant housing units in Oswego County.

Oswego Comment 26:

Oswego County questioned the housing estimates associated with growth inducing development and whether the associated environmental impacts were properly assessed.

Response: The environmental impacts associated with growth inducing development were assessed using standard SEQRA methodology and were based on data from a variety of sources including the 2022 REMI that was sponsored by ESD (see FEIS Appendix C for more information on data sources and methodological approach for growth inducing development). See response to Oswego Comment 25.

Oswego Comment 27:

The Draft EIS does not address impacts associated with the in-migration of construction workers or support the assumptions regarding the number of construction jobs that will be filled by a local work force.

Response: Section 3.15.3.2 of the FEIS evaluates impacts associated with the in-migration of construction workers as part of the in-migrating population induced by the Proposed Project.

The FEIS also evaluates the availability of the local workforce relative to the anticipated employment needs, indicating that a portion of the workforce can be met by local labor, supplemented by workers commuting from outside the immediate area. See FEIS Section 2.1.1.6. Labor Force. As evaluated there, construction of the Micron Campus would require approximately 4,200 construction workers on-site daily during peak construction periods lasting roughly six months for each fab. Information on the local labor market suggests that approximately 2,000 local workers may be available for each phase of the Micron Campus construction, which could help reduce the number of construction crews traveling to the area from other geographical locations.

Oswego Comment 28:

The Draft EIS does not identify the environmental impacts of the project on the construction and materials availability in Central New York, as well as the impact on costs of construction materials, or analyze whether there is sufficient workforce to support the necessary construction.

Response: The FEIS evaluates the reasonably foreseeable significant adverse environmental impacts of the Proposed Project and proposes mitigation measures for those impacts. Though construction and materials availability and prices in Central New York are not significant environmental impacts under NEPA, pursuant to SEQRA, the FEIS includes a discussion of environmental resources that would be irreversibly and irretrievably committed to the Preferred Action Alternative. This includes the building materials needed to construct and operate the Proposed Project. See FEIS Section 5.2.

The analysis in the FEIS found that the Preferred Action Alternative would not have any reasonably foreseeable significant adverse socioeconomic effects. As described in the FEIS, construction of the Micron Campus will employ approximately 4,200 construction workers, which exceeds the amount available locally by approximately 1,500. See FEIS Section 3.15.3.2. As explained in the FEIS, Micron therefore likely will have to hire from outside the local area because Micron will have already employed all available local workers. Much of the analysis in the FEIS is concerned with the environmental and economic effects of anticipated induced regional growth that would result from the influx of Micron workers into the five-county area.

Oswego Comment 29:

There will be delays in new development caused by the need for new infrastructure and the need to fund same.

Response: The anticipated schedule for implementing the Preferred Action Alternative is described in the FEIS although, as acknowledged in Section 2.3, it could be modified. See, e.g., FEIS Figure 2.1-3; Appendix B-5. The comment does not explain why particular delays should be expected. The full buildout of the Preferred Action Alternative will take many years, allowing time for local and regional long-term planning for infrastructure, including budgeting, and source funding for anticipated new development.

Oswego Comment 30:

Oswego County commented that anticipated growth and the tax revenue generated from the same could not exceed the new and additional costs to be incurred by Oswego County and its local governments because of the Project and no funding is earmarked for Oswego County. Current residents will likely be burdened with additional taxes/fees to fund infrastructure improvements.

Response: FEIS Section 3.14 considers public services and concludes that the construction and operation of the Proposed Project are not anticipated to significantly increase demand on public services. The FEIS also explains that induced growth associated with the Preferred Action Alternative would only result in a potentially significant increase in demand for local voluntary firefighting services and not anywhere else in the five-county region. See FEIS Section 3.14.3.2.

Any nonsignificant increase in demand for public services associated with induced growth in any of the five counties is anticipated to be funded via an increased tax base and other revenue associated with the induced growth itself. See FEIS Section 3.14.3.2. Further, as population and tax base grow, local governments and service providers have the capacity to allocate additional

resources to public services, such as the police, to keep pace with demand. Purely economic impacts are also beyond the scope of NEPA and SEQRA.

Oswego Comment 31:

Oswego County commented that the assessment of impacts to community facilities was incomplete as the proposed project and its anticipated induced growth will increase the demand for police services, EMS, teachers and related educational services, healthcare workers, and fire services.

Response: The lead agencies considered the reasonably foreseeable impacts to community facilities, including police services, EMS, schools, healthcare workers, and fire services. FEIS Section 3.14.3.2 concludes that the construction and operation of the Proposed Project are not anticipated to significantly increase demand on public services, either locally or regionally, except for potentially significant effects on the Town of Clay's volunteer firefighting services due to induced growth. To address the potentially significant effect Clay Fire and the Town of Clay's fire response capacity, Micron will be required to pay for and support ongoing training efforts with Clay Fire and other local fire departments. See FEIS 3.14.4. Similarly, Micron will be required to work with Clay Fire to determine any future need for the development of a full-time professional fire service.

Oswego Comment 32:

There is no mention of the Caughdenoy Fire Department, Central Square Fire Department, or Hastings Fire Department, which are all located within 5-miles of the Proposed Project and will likely be first responders in the case of an emergency and will also need training and potentially specialized equipment to respond to needs at the Proposed Project Site.

Response: As discussed in FEIS Section 3.14.4, BMPs and Mitigation Measures "[t]o address the potential significant adverse effect on volunteer fire services as a result of induced growth associated with the Proposed Project, including on Clay Fire and the Town of Clay's fire response capacity, as a mitigation measure, Micron would commit to pay for and support ongoing Micron-related training efforts with Clay Fire and *other local fire departments.*" (emphasis added).

Oswego Comment 33:

Oswego County commented that the Draft EIS is inconsistent since it states that local utilities would not need to conduct any utility improvements (including water and sewer) under the No Action Alternative then later stating that these utilities have identified improvements that would be conducted regardless of the proposed project.

Response: Should the Proposed Project not proceed (No Action Alternative), water and wastewater utility owners would still implement the infrastructure improvements that are already planned and funded. These upgrades are scheduled independently of the Proposed Project and would move forward regardless of its development.

Oswego Comment 34:

The Draft EIS does not consider potential utility upgrades necessary to support the growth inducing effects on other smaller municipal utilities, including those in Oswego County or in areas without public infrastructure.

Response: The FEIS primarily evaluates utility impacts associated with the Proposed Project and planned infrastructure within the immediate area of the Proposed Project. The FEIS acknowledges that induced growth from the Proposed Project could increase demand on regional utilities over time. See FEIS Section 3.10. However, specific upgrades or expansions to smaller municipal utilities beyond the area of the Proposed Project, particularly in localities lacking public infrastructure, are inherently speculative at this stage. Any such improvements would depend on the nature, timing, and location of future development, which are beyond the scope of the FEIS and control of the Lead Agencies.

Should future growth occur in these areas, local utility owners and municipalities would be responsible for assessing their infrastructure needs and planning appropriate upgrades or extensions. These processes are typically governed by local and regional planning efforts and subject to state and federal environmental review. Further, should induced growth occur in Oswego County, it would be subject to environmental review that would be required to analyze the impacts of any such project(s) on municipal utilities.

Where feasible, utility-related infrastructure construction associated with the Proposed Project would be coordinated with local agencies to support comprehensive utility planning.

Oswego Comment 35:

The Draft EIS does not identify/mention the potential growth inducing impacts on historical architectural properties and archaeological resources or threatened and endangered species due to the clearing of land and trees for the continued development of the 5-county region.

Response: The FEIS acknowledges how induced growth associated with the Proposed Project could potentially affect historic properties (see Section 3.5.2.3) and biological resources (see Section 3.4.4.2 (Preferred Action Alternative, Operational Effects, Ecological Communities) across the broader five-county region. Although specific future development outside the Study Area is speculative and cannot be reasonably determined at this time, any future induced growth development would be subject to local land use regulations and environmental review under SEQRA, which includes consideration of impacts to historic properties, archaeological resources, and threatened and endangered species. This ensures that protections remain in place even as regional growth evolves independently of the Micron Project.

Oswego Comment 36:

The Draft EIS does not consider the environmental impacts on the areas where the grassland/habitat mitigation is occurring (e.g, loss of land use, potential rezoning of the land, loss of potential future tax revenue or use for residential housing).

Response: As described in the FEIS, the environmental impacts related to grassland and habitat mitigation are anticipated to be predominantly positive. Mitigation sites were selected due to existing characteristics and the ability to meet the needs of the identified mitigation such as current or former agricultural fields, forested parcels, and adjacent to existing streams, wetlands or forests. See FEIS Appendix F and Appendix G. Overall, restoration, re-establishment, or rehabilitation activities targeting stream, wetland, and grassland habitats are expected to enhance the biological and ecological diversity of the mitigation sites. See Response to Oswego Comment 6.

Oswego Comment 37:

It is stated that the wetland mitigation will be in the same watershed, but this does not appear to be the case.

Response: The planned wetland mitigation will be within the same HUC10 or HUC12 watershed. The entirety of the Proposed Project and mitigation sites are located within the HUC10 Oneida River watershed (HUC 0414020209). The entirety of the Proposed Project and two of the six proposed mitigation sites are also within the HUC12 Oneida River sub-watershed (HUC 041402020905). Figure F-24 in FEIS Appendix F identifies the locations of the proposed mitigation sites in relation to the Proposed Project and the watersheds.

Oswego Comment 38:

The Draft EIS did not solicit information about, nor does it consider, the impact upon public health in Oswego County as concerns the creation of new wetlands connected to the Project and mosquito-vectored diseases.

Response: The properties that The Wetlands Trust (TWT) would develop for the mitigation sites are located in the vicinity of existing wetlands and wet areas, so the establishment and enhancement of wetlands on the properties would not cause a substantial alteration to current conditions in the area. The intent of the mitigation plan is to establish and enhance wetlands at those sites that will develop into a mature, balanced wetland ecosystems that include multiple predator species that eat mosquitoes. The mitigation plan does not include developing any artificial standing water such as cisterns or gutters where mosquitoes are unfettered by predation. The natural wetlands considered for wetlands development have cooler water compared to artificial containers (e.g., gutters, old tires, buckets) that can harbor disease carrying mosquitoes.

Oswego Comment 39:

No consideration in the Draft EIS was given to the potential increased costs which could be incurred by Oswego County in mosquito surveillance and spraying programs in connection with the additional 400 acres of wetlands to be created and along with adjoining acreage.

Response: Because the wetland mitigation sites are not anticipated to increase the need for mosquito surveillance and spraying programs (see Response to Oswego Comment 38), no increased costs are anticipated.

Oswego Comment 40:

Low-income areas have not fully been reviewed as only Onondaga County is considered. Oswego County has low-income areas in proximity to the Project.

Response: All low-income areas in the study area were evaluated. See FEIS 3.16.2.2 (Environmental Justice, Low-Income Communities in Study Area). This specifically included areas in Oswego County.

Oswego Comment 41:

Oswego County commented that the Summary of Effects (Table 3.17-1) should have also considered water and sewer.

Response: Within FEIS Table 3.17-1, water and sewer are listed under the Utilities and Support Infrastructure Resource Area as “Other Utilities.”

Oswego Comment 42:

There are no mitigation measures for direct and ancillary Project impacts in Oswego County.

Response: NEPA and SEQRA require agencies to consider mitigation measures for reasonably foreseeable significant environmental impacts. Because the FEIS does not identify any significant environmental impacts associated with the Preferred Action Alternative in Oswego County, no mitigation measures in Oswego County were deemed necessary or required.

Oswego Comment 43:

Oswego County should be further considered with regard to the growth inducing impacts.

Response: Growth inducing impacts were evaluated as part of each resource area in the FEIS. Because, in many cases, the nature, timing, and location of induced growth was speculative and not reasonably foreseeable, the anticipated impacts were addressed generically. Notwithstanding, to the extent that growth inducing impacts reasonably included Oswego County, they were evaluated to the extent feasible. See, e.g., FEIS Table 3.4-11, Projected Land Cover Loss Due to Induced Growth by 2041; Table 3.8-12, Induced Growth Incremental MSW Projections; Table 3.15-5, Induced Household Growth Projections Exceeding 10 Percent of Existing Household Estimates.

Oswego Comment 44:

The Draft EIS does not take proposed commute times and current commute time patterns into account when projecting the areas that would be impacted the most.

Response: The traffic analysis approach relied on FHWA recommended calibration criteria and measures for Vissim analysis calibration and validation. See FEIS Appendix M, Section 2.4.3.1.

To set up the traffic analysis, the process involved a detailed examination of actual travel times through various road sections, using speed and travel time data. Travel times were checked against real measurements from 2023, including GPS records and speed runs. This ensured that the computer models matched real-life driving conditions. By comparing actual travel times to the model's predictions, the analysis was confirmed to be realistic, with adjustments made when necessary to fit the roadway and ramp conditions.

Oswego Comment 45:

Oswego County commented that the chapter on Irreversible or Irretrievable Commitments of Environmental Resources was inadequate and failed to discuss the lands that will be irretrievably lost because they will be used as part of the mitigation efforts and will be turned into wetlands or habitat sites and will no longer be available for development, the tax monies which will be irretrievably lost to those municipalities (including Oswego County, townships, and schools) because those sites will never be used for a development purpose, residential, commercial or otherwise, as well as the loss of lands due to traffic mitigation measures that propose the widening of roads.

Response: SERQA's requirement to consider irreversible and irretrievable commitment of natural resources to an action does not encompass economic loss from loss of the potential prospect for future development. Notwithstanding, FEIS Section 5.2 has been revised to include in the loss of lands for use as wetland mitigation sites. See also Response to Oswego Comment 36.

Oswego Comment 46:

Oswego County commented that the potential environmental impacts of leasing warehouse space was not considered.

Response: Leasing existing warehouse space does not require new construction or disturbance of land, so it is not expected to have direct environmental impacts. Further, Micron intends to lease existing warehouse space in an industrially zoned area and will not store hazardous materials within the warehouse space, therefore there are no reasonably foreseeable significant environmental impacts associated with Micron's leasing of existing warehouse space. See also FEIS Section 2.1.4, Warehouse Site.

Town of Clay

Clay Comment 1:

The Town of Clay noted that it was proud to serve as the host community as well as its deep appreciation to the leadership demonstrated by Micron, New York State, Onondaga County, and OCIDA in bringing this investment to Central New York. The promise of this project is transformational, and the Town of Clay stands ready to be a full and responsible partner in ensuring its success.

Response: Comment noted.

Clay Comment 2:

The cost of accommodating this project shall not be placed on our current taxpayers or local businesses. We expect Micron, New York State, Onondaga County, and OCIDA to provide the Town of Clay with the resources, coordination, and authority necessary to proactively mitigate and manage the impacts described in the Draft EIS.

Response: Comment noted.

Clay Comment 3:

The Town of Clay is not seeking permanent subsidies because, over time, a growing tax base will restore fiscal self-sufficiency. However, to responsibly meet the early demands of this project, the Town expresses its request for a significant upfront investment to expand capacity in parallel with Micron's development. The Town of Clay requests that funding be committed prior to key construction milestones, with clear sources, disbursement schedules, and scope aligned to the actual service demand and facility impacts and must come through grants and direct appropriations from Micron, New York State, Onondaga County, or OCIDA.

Response: This comment relates to economic issues that are beyond the scope of NEPA and SEQRA. Notwithstanding, Micron has entered into a funding agreement with the Town of Clay to support the technical review of Micron's site plan and other local approvals in advance of construction. Additionally, Micron and the Town of Clay have had preliminary discussions regarding financial support needed to oversee the early construction of the Proposed Project. Micron will continue to engage with the Town of Clay on potential funding opportunities, including seeking funding from county and state sources. The FEIS also provides a fiscal assessment in Section 3.15.3.2. See *Funding for Local Governments and Taxing Districts* in the Growth Inducing Effects. Accordingly, fiscal self-sufficiency was assessed, and no significant adverse impacts were found. See also Response to Clay Comment 4.

Clay Comment 4:

The Town of Clay requested targeted regulatory relief that balances environmental protection with the flexibility required to meet both local and state housing objectives. This relief should be paired with coordinated transportation and infrastructure planning to ensure that available parcels are accessible, serviceable, and compatible with community character. Without such action, the Town maintains that it will be unable to provide sufficient housing to support Micron's workforce needs while maintaining the quality of life expected by our residents.

Response: The lead agencies recognize that the Town's call for coordinated infrastructure and transportation planning is essential to sustainable development and to maintain community standards. As the Proposed Project advances, the lead agencies will require Micron to collaborate with the Town of Clay, New York State, Onondaga County, and other stakeholders to explore avenues for regulatory relief that uphold environmental standards while facilitating responsible,

community-oriented growth. This collaborative approach will help ensure that housing needs are met efficiently and that infrastructure improvements are strategically implemented.

Further, the State of New York has made housing and affordability a top priority and has enacted several programs aimed at increasing the production of housing, including \$650 million in state funding for Pro-Housing communities and \$100 million in capital funding to assist with infrastructure to build new housing. Additionally, housing was identified as an immediate priority by the Community Engagement Committee and will be a central focus of the \$500 million CIF in Central New York. New housing supply—inclusive of affordable housing—would serve to control rent increases and is a critical component of meeting existing and future community demand for housing at lower income levels.

Clay Comment 5:

The Town maintains that the noise study underrepresents the full extent of the impact, noting that the cumulative effect of employee commuting, freight movement, construction activity, and regional development linked to the Micron campus will raise baseline noise levels across much of the Town.

Response: The noise analysis in the FEIS included and assessed the potential increase in noise levels due to increased project-related traffic. The FEIS's noise analysis presents a detailed comprehensive analysis and addresses the multiple sources and types of noise and vibration generated by the Proposed Project, including construction, operations, and transportation-related activities, inclusive of truck trips. It used industry-accepted modeling techniques to predict future sound conditions, providing a robust assessment of potential impacts. See FEIS Section 3.12.3 Noise and Vibration Assessment Methodology. The FEIS integrates the consideration of cumulative effects, analyzing combined impacts from all relevant activities—construction, operation, and traffic. See FEIS Section 3.12.5, Environmental Consequences.

Clay Comment 6:

The Town commented that traffic pattern changes outlined in the Draft EIS will amplify the cumulative effect of noise in the Town. Specifically, the Town states that new interchanges, access road reconfigurations, and raised medians will redirect traffic flows in ways that may concentrate noise along certain corridors and at key residential interfaces; shifts that have not been fully modeled to show their long-term noise implications.

Response: The noise analysis presented in FEIS Section 3.12, Noise and Vibration includes an assessment of the Proposed Project's traffic noise impacts. Further in FEIS Section 4.3.12 traffic noise impacts associated with the recommended traffic mitigations are fully disclosed. Finally, any future changes in traffic patterns, the resulting noise impacts, and determining how these effects would be addressed in association with the implementation of the recommended traffic mitigation improvements will be evaluated by NYSDOT (or the responsible agency for the roadway) who will be performing the detailed planning and design for any roadway improvements within the area.

Clay Comment 7:

The Town requests that noise mitigation go beyond the limited commitments currently described in the Draft EIS and suggest that permanent sound barriers be installed in all feasible locations, including residential areas near Barcaldine Drive, Route 31, Route 11, Caughdenoy Road, and the neighborhoods surrounding the I-481/Route 31 interchange.

Response: The FEIS describes Micron's commitment to installing ground level noise barriers and rooftop equipment enclosures on its property where significant adverse construction and operational noise effects are identified, as outlined in the FEIS. Consultations with property owners will specifically address aesthetic considerations, such as landscaping, to integrate these barriers with existing community character, as detailed in FEIS Figures 3.12-15, 3.12-16, and 3.12-17. Further, noise mitigation measures will be reviewed by the Town of Clay as part of the site plan approval process and ongoing refinements to noise mitigations will be implemented based on a requirement for ongoing noise compliance monitoring, See Clay Comment 10.

Permanent ground-level noise barriers to address traffic noise impacts are generally not feasible along main corridors because many properties require driveway access, which would break the continuity and reduce the effectiveness of the barriers. However, at locations where residences do not have direct driveway access onto the main roads, such as near Barcaldine Drive, installation of permanent noise barriers to effectively mitigate traffic noise is feasible. For most impacted properties, continuous noise mitigation is not feasible.

Because the final selection of traffic mitigation measures falls within the jurisdiction of the FHWA and NYSDOT, the noise impacts resulting from specific mitigation measures for the traffic improvements ultimately selected by the agencies will be analyzed in the NYSDOT and FHWA environmental review.

Clay Comment 8:

Where right-of-way or design constraints prevent noise barrier installation, the Town recommends the use of alternative methods such as vegetated berms, low-noise pavement surfaces, or building façade improvements should be deployed.

Response: Comment noted.

Clay Comment 9:

The Town requests that noise mitigation also address construction-phase noise, which will occur over many years and could involve pile-driving, heavy vehicle traffic, and large-scale material handling. The Town recommends the use of best practices, including the use of properly muffled and acoustically insulated equipment, restrictions on nighttime activities, and selection of lower-impact construction methods where feasible.

Response: FEIS Section 3.12.6 provides a list of construction BMPs intended to minimize noise, as well as structural mitigation measures such as temporary and permanent barriers for effective construction noise screening. Further, the FEIS provides that construction hours would be required to comply with the Town of Clay Code, which prohibits noise associated with demolition and construction between 7 PM and 7 AM on weekdays, before 8 AM and after 5 PM on Saturday and any time on Sunday. Ongoing refinements to noise mitigations will be implemented based on a requirement for ongoing noise compliance monitoring, See Clay Comment 10.

Clay Comment 10:

To protect public health and maintain accountability, the Town expects continuous noise monitoring at representative receptor locations during both construction and operation, with results made publicly available. The monitoring network should also be integrated with the Town's broader communication strategy, enabling residents to access up-to-date information on noise conditions in their neighborhoods.

Response: The lead agencies will require Micron to install noise monitoring at receptors to continuously monitor noise from the Proposed Project and adapt noise mitigation measures as necessary to reduce impacts.

Clay Comment 11:

The Town requests that noise monitoring be paired with adaptive mitigation measures so that if monitored noise exceeds modeled levels, additional controls will be deployed.

Response: See Response to Clay Comment 10.

Clay Comment 12:

The Town commented that the Micron Project's duration and scale make noise impact a permanent quality-of-life issue for the Town and that addressing it equitably from the start will require full funding for both physical infrastructure and ongoing operational controls, not temporary or piecemeal measures.

Response: The FEIS details BMPs, noise reduction strategies, and specific mitigation measures, including permanent features such as noise barriers and louvers, that will be implemented at the appropriate times to control noise levels. See FEIS Section 3.12.6. The locations of the proposed permanent noise barriers are shown in Figures 3.12-15 through 3.12-17, with additional details provided in Table 13.12-15. See also Response to Clay Comment 10.

Clay Comment 13:

While noting the comprehensive set of Best Management Practices (BMPs) intended to protect public health, safety, and the environment during the construction and operation of the Micron campus detailed in the Draft EIS, the Town notes that there are essential, several critical gaps and clarifications needed to ensure they are effective, enforceable, and fully funded.

Response: The BMPs identified in the FEIS for each resource area have been determined to be sufficient and their implementation will be enforced by the lead agencies. Notwithstanding, Micron will continue to engage with the Town of Clay to address concerns related to the effectiveness of its BMPs.

Clay Comment 14:

The Town requests that Micron's Spill Prevention, Containment, and Countermeasure (SPCC) Plan, Spill Prevention Report (SPR), and Risk Management Plan (RMP) detail storage vessel specifications, operational safeguards, worst-case release scenarios, employee training, and emergency response protocols and include provisions for adequate on-site containment materials, such as manhole covers, absorbents, and temporary dikes. The Town also requests that the plans be reviewed by NYSDEC and USEPA.

Response: The cited plans will be reviewed and approved by the applicable regulatory agencies. See also responses under Health & Human Safety, Community Facilities, and Solid Waste & Hazardous Materials relative to employee training, emergency response and RMP.

Clay Comment 15:

The Town expects confirmation that Micron will maintain on-call contracts with trained private spill-response contractors capable of mobilizing quickly for on-site or off-site incidents.

Response: Micron will be required to maintain an on-site ERT for deployment, when needed, to assess, manage, and respond to spills and emergency situations. Further, Micron maintains on-call contracts with trained professionals to support Micron ERT, as needed or requested. For off-site response, Micron would contract with carriers and shippers of hazardous materials that maintain 24/7 emergency response support in the event of hazardous materials spills prior to and during transit, and appropriate incident reporting protocols. See FEIS Section 3.8.3.2 and 3.8.4. See also Response to Community Facilities Comment 12 and Solid Waste and Hazardous Materials Comment 57.

Spills that occur during transportation are the responsibility of the transporter, per USDOT regulations. Typically, both the NYSDOT and the carrier retain on-call emergency response professionals that are immediately called when a chemical spill occurs during transportation. Initial response times vary based on the contract and the location of the spill.

Clay Comment 16:

The Town commented that Micron may be required to prepare and submit a Facility Response Plan to USEPA if all petroleum storage vessels are not equipped with secondary containment.

Response: Comment noted.

Clay Comment 17:

The Town commented that local fire departments will require additional specialized training and equipment to respond effectively to chemical emergencies. The receipt, handling, and storage of large volumes of hazardous chemicals and petroleum products will necessitate specialized planning, training, and equipment at the local level.

Response: See Responses to Community Facilities Comment 1 and 2. Calls to the local fire department are anticipated to be minimal. Micron would implement its ERMS and deploy its ERT beginning with construction, and they would also be in place and govern emergency response throughout continuous Proposed Project operations. Micron's ERT would act as the initial line of response to any fire alarms on the Micron Campus and would be equipped to handle smaller fires and hazardous material spills. Micron would adhere to applicable requirements to report fires, spills, or other accidents to government agencies such as NYSDEC or USEPA. See FEIS Section 3.8, Solid Waste, Hazardous Waste, and Hazardous Materials. In the event of a structural fire or a hazardous material spill requiring outside assistance, the ERT would notify Clay Fire via 911.

As part of construction planning, Micron would engage closely and collaboratively with local fire departments, including Clay Fire and Cicero Fire, to familiarize local fire service personnel with any potential Proposed Project construction hazards such as construction site fuel and chemical storage, jointly prepare to implement best management practices for construction fire safety, and ensure compliance with applicable fire protection code requirements.

Prior to operations, Micron, Clay Fire, and the Syracuse Fire Department would establish a joint protocol for when the Syracuse Fire Department's hazardous material response unit would be brought in to address a relevant incident. Onondaga County DEM also would alert and deploy Cicero Fire as needed.

Clay Comment 18:

The Town comments that stormwater and wastewater management systems be designed, constructed, and operated to ensure that all discharges meet or exceed applicable federal and state water quality standards.

Response: Micron will be required to ensure that all discharges meet applicable federal and state water quality standards.

Clay Comment 19:

The Town comments that the upgrades required at the OOWWTP to handle wastewater from Micron's operations be fully funded by Micron and its partners to prevent any financial or service impacts on existing customers and to safeguard downstream water quality.

Response: Onondaga County will establish policy and guidelines for appropriate user rates for the IWWTP to support Micron's operations in Clay. The IWWTP is not part of the OOWWTP system that provides wastewater service to residential and commercial users. See Utilities Comment 2.

Clay Comment 20:

The Town commented that winter maintenance of all roadways serving the Micron campus and surrounding neighborhoods be developed and implemented in a coordinated, science-based strategy that reduces environmental impacts. The recommendations of the 2024 Adirondack Road Salt Reduction Task Force Report should be included such as brine and pre-wetting technologies, calibrated spreaders, alternative deicers, and comprehensive operator training to minimize salt use. This salt reduction strategy should be incorporated into and measured against the Draft EIS-proposed water quality monitoring program to ensure that its effectiveness is documented, and corrective actions are taken when necessary.

Response: Micron would be required to implement BMPs and post-construction SMPs as a condition of its SPDES permit, which would be designed to accommodate, slow, and hold stormwater runoff and to filter out the pollutants (e.g., salt) it would carry from the impervious surfaces. Those BMPs may also include suggestions such as such as brine and pre-wetting technologies, calibrated spreaders, alternative deicers, and comprehensive operator training to minimize salt use. Micron intends to work with local, County, and State Departments of Transportation to review their best practices in order to provide consistency within the watershed.

Clay Comment 21:

The Town requested clarification on the land use, speed and conceptual locations considered in the TIS. The Town of Clay's future land use needs are not specified in the Traffic Impact Study (TIS), and recommended Three Rivers along Maider Road, the Complex along Morgan Road, and the Historic Clay Center at Willer Canning Road be included as locations.

Response: Only approved developments with quantified trip generation are included in the SMTC Regional Model and the Traffic Impact Study (TIS) for background traffic volumes. Projects still in planning or conceptual stages are excluded. Final traffic improvements for approved projects will be evaluated by FHWA and NYSDOT, with implementation planning led by NYSDOT or the agency responsible for coordination with affected municipalities. The Town of Clay is encouraged to share its recommendations during future environmental review processes for proposed traffic improvements. See FEIS Section 3.11.3.4, Analysis of Recommended Mitigations and FEIS Section 3.11.5 Recommend Mitigations.

Clay Comment 22:

The Town commented that the TIS fails to contain content on impacts to emergency services. Clarification was requested whether impacts to response times were considered as well as coordination during construction for impacts to emergency services and their facilities and whether there would be impacts to the fire department building at US 11.

Response: The TIS evaluated significant adverse impacts on overall intersection operations and freeway facilities and identified potential mitigations. For the purposes of the FEIS, significant impacts on the transportation network were defined in Table 3.11-4 (typically a degradation LOS D or better from the No Action Alternative to LOS E or LOS F in the Preferred Action Alternative).

The goal of Section 3.11 was to identify potential mitigation measures that would bring LOS back to acceptable limits. Although emergency response times were not specifically investigated, the recommended traffic mitigation measures identified would potentially improve emergency response times in some cases.

As described in FEIS Section 3.11.3.4, Analysis of Recommended Mitigations, recommended traffic mitigation measures within the jurisdiction of federal, state, and local transportation agencies, and thus the detailed design and implementation of recommended mitigation measures, such as the widening of Route 31, are subject to the discretion of those agencies and would be subject to further review and approval by NYSDOT, FHWA, and other jurisdictional agencies, including additional environmental review. Coordination with emergency services would be completed as part of the planning and design stages of the roadway improvements by the agencies responsible. The impacts to emergency services will be included as part of the NYSDOT project evaluation.

As detailed in FEIS Appendix L-3, Micron's Emergency Response Management System (ERMS) is intended to minimize potential calls to local emergency services, although Micron would call them in cases of certain emergencies that would warrant assistance from first responders, such as active fires, confined space rescues, loss of consciousness, loss of life, potential loss of limb or sight, chest pain, or other situations that the on-site Occupational Medical Director determines. Micron's response capabilities would include CPR and AED use, emergency medical trauma care, medication administration, confined space and high-angle rescue, initial chemical and hazmat response, and limited fire response. Micron has an existing mutual aid agreement with Clay Fire and has engaged with the Clay and Syracuse fire departments, as well as NAVAC and NOVA for EMS. The latter two organizations anticipate having adequate capacity to respond to incidents at the Micron Campus.

Clay Comment 23:

The Town commented that the TIS did not include traffic data results for the proposed traffic improvements at Verplank Road.

Response: The need for the Verplank Road interchange will be determined by NYSDOT as part of its evaluation and determination of the final traffic improvements. Initial traffic forecasting revealed minimal traffic volumes would be anticipated associated with the Preferred Action Alternative to utilize the interchange compared to the NYS Route 481 and NYS Route 31 interchange.

Clay Comment 24:

The Town commented in support of the proposed new Verplank interchange.

Response: See Response to Clay Comment 23.

Clay Comment 25:

The Town requests that transportation BMPs go beyond current Draft EIS commitments.

Response: The final traffic improvements will ultimately be chosen and fully evaluated by the FHWA and NYSDOT.

Clay Comment 26:

The Town recommended the use of traffic signal coordination, particularly along Route 31 from Oswego Road to I-481, to improve peak-hour flow and reduce congestion.

Response: The traffic analysis contained in the FEIS and TIS assumed signal timings and coordination would be optimized. The implementation of optimized signal programming or systems would be the responsibility of the agencies who are responsible for the signals (e.g. local municipalities or NYSDOT). The final traffic improvements will ultimately be chosen and fully evaluated by the FHWA and NYSDOT.

Clay Comment 27:

The Town commented that adaptive signal control should be deployed both during construction and permanently and that preemption systems should be installed to prioritize emergency and transit vehicles.

Response: See Response to Clay Comment 26.

Clay Comment 28:

The Town commented that transportation demand management (TDM) measures, such as employee shuttle programs, carpool incentives, and parking management, be implemented early to reduce single-occupancy vehicle trips.

Response: See Responses to Transportation Comments 17 and 19. The lead agencies recommend that Micron incorporate such measures, to the extent feasible and practicable.

Clay Comment 29:

The Town requested that side street pedestrian and bicycle connections, bus pull-off bays, and improved lighting at intersections be added to ensure safe and efficient multimodal travel. Additional information is requested regarding where lighting is expected to be placed.

Response: NYSDOT (or the responsible agency for the roadway) will be performing the detailed planning and design for any roadway improvements within the area tied to the Preferred Action Alternative recommended mitigations, which will consider multi-modal improvements, transit upgrades, and safety improvements such as lighting installation. See FEIS Section 3.11.3.4, Analysis of Recommended Mitigations.

Clay Comment 30:

The Town requests that construction staging and sequencing be planned to minimize disruptions to local businesses, residents, and emergency service access.

Response: Staging and sequencing construction of a project of this magnitude is a complex, multi-decade effort. The staging and sequencing have been designed to realistically meet the needs of the Proposed Project, the region, and the nation, as well as the local community. As currently proposed, the Preferred Action Alternative may have some reasonably foreseeable significant effects on the local community, including on local fire services, traffic, and noise associated with traffic. See FEIS Section 3.17 (Summary of Effects).

Some of the impacts noted in the FEIS will be mitigated below significance (e.g., fire services), some will be substantially mitigated through future mitigation implemented by other agencies (e.g., traffic improvements approved and implemented by FHWA and NYSDOT), while others will be significant despite mitigation implementation (e.g., noise associated with traffic). The construction staging and sequencing is explained in the FEIS and will be followed by Micron, which will remain cognizant of the needs of the local community and be careful to minimize impacts to the local community throughout the 16 years of Proposed Project construction.

Clay Comment 31:

The Town requests that traffic improvements be evaluated for their impact on fire department response times and neighborhood connectivity before implementation. Where negative impacts are identified, alternative designs or mitigation measures must be adopted.

Response: The TIS evaluated significant adverse impacts on overall intersection operations and freeway facilities and identified potential mitigations. Although emergency response times were not specifically investigated, the mitigations identified would potentially improve emergency response times in some cases. Final traffic improvements will ultimately be chosen and fully evaluated by the FHWA and NYSDOT. This is anticipated to include an assessment of potential impacts on response times and neighborhood connectivity.

Clay Comment 32:

The Town requested additional information of where roadway lighting is planned and recommended that it be considered for intersections at location to enhance safety for pedestrians and bicyclists.

Response: See Response to Clay Comment 29.

Clay Comment 33:

The Town commented that most of the proposed roadway improvements are focused on State Roads and that additional work should be considered for side streets, County Roads, and those at a local level. Route 31 concepts also do not appropriately factor in

u-turns for emergency services. Improvements show a standard sidewalk and a wide shared use path along NYS Route 31, but not along side streets.

Response: As part of NYSDOT's design of the NYS Route 31 widening and other roadway improvements, NYSDOT would coordinate with emergency services. Pedestrian and bicycle accommodations would be integrated into the overall transportation and land-use planning framework as described in Section 3.11.3.5. Sidewalks and shared use improvements would be developed as part of their comprehensive master planning process, ensuring that side streets provide safe, accessible, and continuous links between the proposed concept improvements on state roads and residential neighborhoods and commercial areas.

Clay Comment 34:

The Town provided various comments and recommendations regarding the proposed traffic improvements.

Response: Future planning and detailed design for the implementation of recommended mitigation measures will be completed by NYSDOT (or the agency responsible for the roadway facility) who would coordinate with the local municipalities impacted by the project(s). Section FEIS Section 3.11.3.4, Analysis of Recommended Mitigations, and FEIS Section 3.11.5 Recommend Mitigations. The Town is encouraged to provide their recommendations to the agencies with jurisdiction over traffic and road infrastructure during the environmental review of the proposed traffic improvements by FHWA and NYSDOT.

Clay Comment 35:

The Town requested that the proposed utility work be described and the associated impacts to roads, residences and businesses.

Response: Proposed utility work is addressed in the FEIS as Connected Actions. Any additional utility work that may be necessitated by induced growth cannot be specifically evaluated at this time as the nature, extent, timing and location of induced growth is currently too speculative.

Clay Comment 36:

The Town commented that EV charging facilities should be considered.

Response: Micron is planning on providing EV charging stations as part of its campus development. See FEIS Table 3.7-13.

Clay Comment 37:

The Town comments that funding and technical support to train, equip, and maintain the readiness of the Town's volunteer fire departments, police, and code enforcement staff must be provided to allow the Town to ensure compliance with BMPs throughout the life of the project.

Response: See Responses to Community Facilities Comment 1, 2, and 15. See also Response to Clay Comment 17.

Clay Comment 38:

The Town comments that BMPs for the Micron Project be treated as binding commitments, backed by enforceable agreements and sufficient funding.

Response: The lead agencies will require Micron to implement the BMPs described through the FEIS and coordinate with the Town regarding funding and enforceability.

Clay Comment 39:

The Town requests that Micron establish and maintain a formal community outreach and engagement program to serve as a direct and permanent channel between the company, its public partners, and the people of Clay. This program should include regular project updates on construction progress, operational changes, and anticipated impacts, public reporting on compliance with key mitigation measures clear and accessible channels for residents to raise concerns, receive timely responses, and track resolution of issues.

Response: Micron has agreed to continue its current bi-weekly meetings with a cross-functional team of representatives from the Town of Clay and is supportive of continuing this regular engagement with Town officials to address questions and issues as the Proposed Project progresses.

Town of Cicero

Cicero Comment 1:

The Town of Cicero commented that it would be prudent for the proposed improvements to Lakeshore Road and the Lakeshore Road Spur as well as the connection to the new I-81 interchange from Route 11 and Sneller Road to include a Shared Use Path or sidewalk given that adding safe pedestrian connections is very important to the community.

Response: FHWA and NYSDOT will determine the final design of traffic improvements that are necessary and feasible. See FEIS Section 3.11.5 (Recommended Mitigations). The Town is encouraged to provide recommendations to these agencies during the environmental review of the proposed traffic improvements. The FEIS identified the provision of shared-use paths and sidewalks along NYS Route 31 and US Route 11 as well as connecting paths and sidewalks along existing corridors, and the provision of crosswalks and other safety improvements at intersections and interchanges. See FEIS Section 3.11.3.5 Bicycle & Pedestrian Facilities. NYSDOT will be developing a more detailed design that will implement the proposed improvements along NYS Route 31 at the I-81 interchange and Lakeshore Road intersection.

City of Syracuse

Syracuse Comment 1:

The socioeconomic effects of the Preferred Action Alternative would be significant and beneficial.

Response: Comment noted.

Syracuse Comment 2:

The Proposed Project's construction and operational activities would generate off-site economic activity and additional jobs and labor income within industries supporting Micron's construction, and within governments and businesses supporting workers' day-to-day spending.

Response: Comment noted.

Syracuse Comment 3:

The City commented that new Micron related jobs will attract young professionals to the area. If 5% to 10% of those young professionals choose to live in the City, that would conservatively translate to 2,000 to 4,000 new households in the City, over the next two decades from this project alone.

Response: Comment noted.

Syracuse Comment 4:

The City stated that it has led regional collaboration on workforce development and career training programs in industries essential to a success semiconductor industry: building and construction trades and technology and advanced manufacturing.

Response: Comment noted.

Syracuse Comment 5:

The City supported the Draft EIS's conclusion that, "the Preferred Action Alternative would not result in any significant adverse effects with respect to zoning or public policies, and it would likely result in beneficial effects by fulfilling economic development policy goals."

Response: Comment noted.

Syracuse Comment 6:

The City noted that although the Preferred Action Alternative would result in significant adverse effects on transportation and traffic in the surrounding areas during certain periods of construction and operation, many of these effects would be addressed through

mitigation measures developed with input from agencies with jurisdiction to implement such measures.

Response: Comment noted.

Syracuse Comment 7:

The City commented that, even though the transportation impacts are generally limited to the project study area, which would not directly affect the City, it is supportive of the recommended mitigations identified in the Draft EIS to mitigate the adverse traffic impacts.

Response: Comment noted.

Syracuse Comment 8:

The City recommended that Micron work in close coordination with Centro to provide robust public transportation service from the City of Syracuse directly to the project site and that this service should be aligned with the anticipated Bus Rapid Transit system to make it possible for City residents to easily get to project related jobs with minimal harmful impact to transportation.

Response: Comment noted.

Syracuse Comment 9:

The City noted that while the displacement of the wetlands in the proposed project area is not beneficial to the regional environment, the proposed replacement and restoration of new wetlands at a 2:1 ratio is valuable.

Response: Comment noted.

Syracuse Comment 10:

The City encouraged Micron to meet or preferably exceed the 2:1 ratio and provide critical wetlands to support ecosystems affected by the proposed development.

Response: The lead agencies agree with USACE and NYSDEC that a 2.2:1 ratio is sufficient and appropriate.

Syracuse Comment 11:

The City commented on Micron's commitment to purchase 100% carbon-free electricity utilizing power purchase agreements and renewable energy credits (RECs) as well as Micron's proposals to decrease the project's impact on climate change and support renewable energy locally, noting that these were things that the City is supporting through the Sustainable Syracuse Initiative.

Response: Comment noted.

Syracuse Comment 12:

The City noted that although there will be a significant water impacts in the region, proposed system upgrades are planned by Onondaga County Water Authority. Specifically, OCWA is designing its planned infrastructure improvements with redundancy measures, including redundant parallel pipelines, and these features enhance infrastructure resilience, minimizing risks to service reliability during maintenance or emergencies.

Response: Comment noted.

Syracuse Comment 13:

The City noted that it is encouraged by much of the Draft EIS, specifically the expected economic growth, investment in the region, and positive impacts on jobs. These economic benefits are anticipated to help many communities work toward greater fiscal sustainability, including the City.

Response: Comment noted.

Syracuse Comment 14:

The City commented that the Micron Project will launch the region into exponential growth in a variety of areas, and it will create a historic economic boost that will extend throughout Central New York.

Response: Comment noted.

Syracuse Metropolitan Transportation Council

SMTC Comment 1:

The Syracuse Metropolitan Transportation Council (“SMTC”) commented, with reference to Section 2.1.7.1 of the Draft EIS, that its planning area no longer includes “a small portion of the Granby.”

Response: The comment appears to reference Section 2.1.7.1 of the TIS, not the DEIS. The commenter is correct that the SMTC planning area no longer includes a small portion of the Granby.

SMTC Comment 2:

SMTC commented that Table 3-1 of the Draft EIS should be updated to correct roadway jurisdictions.

Response: The comment appears to reference Table 3.1 in the TIS, not the DEIS. The referenced table was intended to refer to roadway ownership, rather than roadway maintenance jurisdictions. Despite the table headings, the table accurately reflects roadway ownership as intended,

SMTC Comment 3:

SMTC commented that it would be helpful to have a map/graphic summarizing the trip distribution in Section 3.4 of Appendix M of the Draft EIS.

Response: Appendix M of the DEIS is the TIS. SMTC's regional travel model is larger than the Transportation Evaluation Area established in the TIS. Illustrating the travel patterns extrapolated from the SMTC regional model would introduce confusion with respect to the TIS boundaries. Accordingly, the supplemental graphic was not added; the written description in the TIS of the relationship between regional model and the TIS boundaries is sufficient to show how the regional model was relevant background for development of the model network.

SMTC Comment 4:

SMTC questioned the crash reduction statistics that were identified in Section 4.3 of the Draft EIS and requested the source of that analysis.

Response: The section referenced in the comment relates to the TIS (Appendix M of the DEIS). The safety analysis was based on crash data from the NYSDOT Accident Location System (ALIS) and Crash Location and Engineering Analysis and Reporting (CLEAR). The expected crash reduction analysis used the Safety Investigation Procedures Manual, also known as the Yellow Book (NYSDOT, 2023b). See TIS Section 4. The safety analysis was conducted by a Professional Engineer with Professional Traffic Operations Engineer and Roadway Safety Professional (level 1) certifications.

SMTC Comment 5:

SMTC asked whether the reference in Section 6.1.4 of the Draft EIS to the North, South, East, West Interconnect project is referring to the City of Syracuse's signal interconnect and, if so, why is that project relevant given that it would not include any intersections in the Transportation Evaluation Area.

Response: The comment appears to reference Section 6.1.4 of the TIS, not the DEIS. The TIS Section 6.1.4 - Excluded Developments and Transportation Evaluation Area Roadway Network Changes, categorizes the North, South, East, West Interconnect project as an "excluded project" precisely because this project does not impact the TIS/Transportation Evaluation Area.

SMTC Comment 6:

SMTC questioned the statement that "[t]he addition of the ramp from southbound Caughdenoy Road to southbound NYS Route 481 provides a more direct exit from the campus to the southeast." SMTC commented that a more likely explanation is that residents of the areas around Stearns Rd and Caughdenoy Road would utilize this new 481SB on-ramp.

Response: Once the ramp is constructed, Micron traffic and residential traffic would both be able to utilize the new ramp.

SMTC Comment 7:

SMTC commented that it would be fairer to compare the incremental value of each mitigation scenario to the prior (less intensive) scenario.

Response: The TIS and FEIS evaluated the number and locations of significant adverse impacts from the Preferred Action Alternative within the Transportation Evaluation Area, defined as the roadway network within a 5-mile radius of the Proposed Project, and the ability for each Mitigation Scenario to address those impacts. The comparison of No Action Alternative to Preferred Action Alternative identifies the significant impacts while the comparison of Preferred Action Alternative to each Mitigation Scenario captures the number of significant impacts mitigated. Each scenario was meant to be evaluated independently of the other scenario. This approach allows for a clearer understanding of how each scenario performs on its own merits.

SMTC Comment 8:

SMTC questioned the differences between Mitigation Scenario C and Mitigation Scenario B and whether there was a material difference.

Response: The main distinction between Mitigation Scenarios B and C is that Scenario C includes an added interchange ramp from Caughdenoy Road to eastbound NYS Route 481. This ramp decreases the traffic volume on the New Access Road and its new interchange with NYS Route 481.

SMTC Comment 9:

SMTC commented on sheet plans shown in Chapter 10 and inquired whether all existing unsignalized side streets and driveways will still have full access to Route 31. It also questioned why some unsignalized intersections were shown in detail on the plan sheets, while others are not.

Response: The existing recommended mitigation measures shown in Figure 10-1 – Concept Schematic Plan serve as guidance and placed a representative typical roadway section and access controls. Final decisions regarding access management and intersection treatments will be subject to further evaluation and approval by the responsible transportation agency, such as NYSDOT, during the development of detailed design plans.

SMTC Comment 10:

Regarding the proposed widening to three travel lanes in each direction (plus additional turn lanes at major intersections) on Route 31 west of NY 481, SMTC asked for the justification for widening west of NY 481 and also why there were no turn restrictions at the remaining unsignalized driveways.

Response: The widening is proposed in response to reduced traffic operations in the areas affected by the Preferred Action Alternative. All of the mitigation measures described in DEIS Section 3.11.3.4 – Analysis of Recommended Mitigations were developed collaboratively with NYSDOT,

and will be further studied and analyzed by FHWA and NYSDOT as well as other relevant agencies prior to any potential implementation.

SMTC Comment 11:

SMTC requested consideration of a future connection to Sutcliffe Drive in the design of the Carling Road extension, which would allow residents of the Pine Gate area better access to Route 31 while reducing trips on Soule Road. SMTC requested that coordination with the Town of Clay occur and that traffic calming measures be incorporated on Sutcliffe Drive to alleviate any potential concerns about through traffic.

Response: The comment falls under the jurisdiction of local agencies to improve circulation and should be addressed through their future planning processes.

SMTC Comment 12:

SMTC inquired whether it is necessary to move the bike path to the south side of Route 31 in the segment between the NY 481 interchange and the westernmost Great Northern Mall driveway.

Response: NYSDOT, as the roadway agency responsible for the intersection, will determine how to support the path through this area with their future planning and design processes. SMTC is encouraged to provide its recommendations to these agencies during the environmental review of the proposed traffic improvements.

SMTC Comment 13:

SMTC asked whether alternative designs were considered that would use less land than the proposed NY 481 Verplank Road interchange.

Response: NYSDOT, as the roadway agency responsible for the interchange, will make a final determination as to the need and configuration of the interchange. SMTC is encouraged to provide its recommendations to these agencies during the environmental review of the proposed traffic improvements.

SMTC Comment 14:

SMTC recommended the use of other design tools to encourage traffic to/from the Micron facility to utilize the new access road, while maintaining connectivity of Caughdenoy Road (i.e. traffic calming on Caughdenoy Road, perhaps limiting to right-in/right-out access at Route 31).

Response: Within the recommended traffic mitigations included in the DEIS, the south leg of Caughdenoy Road at NYS Route 31 was converted to a cul-de-sac to reduce Micron-related traffic through residential communities directly adjacent to Caughdenoy Road and to improve traffic flow at local signalized intersections. This design directs vehicles traveling to and from the Micron Campus via NYS Route 481 to utilize the New Access Road, rather than the existing and planned ramps at the Caughdenoy Road and NYS Route 481 interchange.

SMTC Comment 15:

SMTC suggested continuing the share-use path along the access road into the site along the Micron entrance road.

Response: The nature and extent of necessary and appropriate traffic improvements will be determined by the FHWA and NYSDOT. SMTC is encouraged to provide its recommendations to these agencies with jurisdiction during the environmental review of the proposed traffic improvements.

SMTC Comment 16:

SMTC requested clarification of the intent for the Connector Road/Micron Access Road and suggested adding a bicycle facility to this road.

Response: The New Access Road will be developed by the owning jurisdiction as part of their plans, and included in the applicable environmental review, by NYSDOT and FHWA. The inclusion of pedestrian facilities along this road could be viewed as a first step to providing a more continuous pedestrian network. The nature and extent of necessary and appropriate traffic improvements will be determined by appropriate roadway owner (Town of Clay, Onondaga County, or NYSDOT). SMTC is encouraged to provide its recommendations to these agencies with jurisdiction during the environmental review of the proposed traffic improvements.

SMTC Comment 17:

SMTC recommends coordination with the Town of Clay and Onondaga County Planning Department on a comprehensive vision for land use and transportation development for the area.

Response: Comment noted.

SMTC Comment 18:

SMTC inquired what alternatives were considered for widening at Route 31/Route 11 and noted that on-road bike lanes should be removed and separated bike facilities used instead.

Response: A roundabout was found not to provide adequate traffic operations at this location based on the projected demand. The nature and extent of necessary and appropriate traffic improvements will be determined by the FHWA and NYSDOT. SMTC is encouraged to provide its recommendations to these agencies with jurisdiction during the environmental review of the proposed traffic improvements.

SMTC Comment 19:

SMTC commented that the existing designated snowmobile trail along Route 31 through the I-81 interchange area was not incorporated into the designs and consideration should be given to relocating it to Sneller Road to cross I-81.

Response: NYSDOT, as the responsible state transportation agency, would coordinate future easement agreements, if able, and develop the final design plans for this area. The comments will be made available to NYSDOT. See also Response to Community Facilities Comment 27.

SMTC Comment 20:

SMTC commented that the new site entrance road on Route 11 should be labeled on Sheet 6a and inquired whether any consideration was given to a roundabout instead of a new signal at this location.

Response: The new entrance from Route 11 to the Micron Campus is clearly delineated on Sheet 6a, and its relationship to the Micron Campus and other Proposed-Project related improvements is illustrated in the “Key Map” in the lower right hand of the page. According to the map legend, the dotted yellow line around the depicted site entrance clearly “denotes designates future site plan or construction,” and no additional labeling is necessary. For the most reliable map rendering, maps should be opened in their native format, as some map details may not render fully in all browsers or when insufficient memory has been allocated for file viewing.

The ultimate traffic control and signing approach of the new site entrance and Route 11 will be determined by NYSDOT, as the state transportation agency responsible, in coordination with Micron. The comments will be made available to NYSDOT for their consideration when developing the final design plans. Notwithstanding, the nature and extent of necessary and appropriate traffic improvements will be determined by NYSDOT. SMTC is encouraged to provide its recommendations to these agencies with jurisdiction during the environmental review of the proposed traffic improvements.

SMTC Comment 21:

SMTC suggested continuing the shared-use path along Sneller Rd through the proposed interchange with I-81.

Response: The nature and extent of necessary and appropriate traffic improvements will be determined by the FHWA and NYSDOT. Final design plans for this area, including determining the logical termini for the shared-use path along US Route 11 and Sneller Road, if warranted. SMTC is encouraged to provide its recommendations to these agencies during the environmental review of the proposed traffic improvements.

Cortland County Industrial Development Agency

Cortland IDA Comment 1:

The Cortland County Industrial Development Agency (“Cortland IDA”) offered its strong support for the Micron Project, noting that the project represents a historic opportunity for the region and state.

Response: Comment noted.

Cortland IDA Comment 2:

Cortland IDA commented that the Micron Project is poised to generate tens of thousands of direct and indirect jobs, including a significant number of high-paying positions in semiconductor manufacturing. The ripple effects of this investment will reach far beyond the Onondaga county, offering surrounding communities like Cortland the opportunity to contribute to, and benefit from, the project's long-term success.

Response: Comment noted.

Cortland IDA Comment 3:

Cortland IDA stated that it is actively engaged in supporting workforce development with two higher education institutions and a growing network of vocational training programs, which will enable Cortland County to be well-positioned to supply talent in construction, electrical work, HVAC, precision machining, and other trades critical to the project's development phases.

Response: Comment noted.

Cortland IDA Comment 4:

Cortland IDA commented that Cortland County businesses and contractors stand ready to support the project's induced growth, and that it is committed to facilitating connections between local businesses and the Micron supply chain.

Response: Comment noted.

Onondaga Nation

Nation Comment 1:

The Onondaga Nation ("Nation") supported the community request for a 120-day public comment period.

Response: See Response to Public Review Comment 3. As a participating entity in the development of the DEIS, the Nation was given significantly more time to review and comment on the DEIS during its development and as acknowledged in the Nation's comments, many of the Nation's concerns were addressed prior to public release of the DEIS.

Nation Comment 2:

The Nation noted that both SEQRA and NEPA require that the public have the opportunity for meaningful and effective engagement with the DEIS.

Response: See Response to Public Review Comments 3 and 4. The public had a full opportunity for meaningful and effective engagement with the DEIS.

Nation Comment 3:

The Nation supported requests for multiple public hearings at locations across the affected area.

Response: See Response to Public Review Comments 4.

Nation Comment 4:

The Nation commented about its special role in environmental matters in this Region and stated that the “affected area” for the Micron Project, as it is defined in the Draft EIS, falls entirely within the Nation’s traditional territory. The Nation’s unique relationship with this land was recognized under the 1794 Treaty of Canandaigua, in which the United States recognized this connection and guaranteed the Nation’s “free use and enjoyment” of its original territories.

Response: Comment noted.

Nation Comment 5:

The area directly affected by the proposed Micron project and its connected actions is of particular cultural and historical significance to the Nation.

Response: The lead agencies recognize the Nation’s cultural and historic connection to the areas where the Proposed Project and Connected Actions are located. The Department of Commerce has initiated Section 106 Consultation under the National Historic Preservation Act of 1966 on the Proposed Project and Connected Actions.

Nation Comment 6:

The Draft EIS does not consider a sufficient range of alternatives because the overarching purpose and need for the Micron Project was translated into an extremely narrow production goal, which was never properly explained or justified, and the Draft EIS failed to consider recent changes in the domestic chip production landscape that may affect the way that the overall project purpose and need is translated into an on-the-ground production goal.

Response: To the extent that this comment relates to CPO’s purpose and need (see FEIS 1.0.1 and 1.1.1), as stated in FEIS Section 2.2, CPO considered a reasonable range of alternatives to its Proposed Action (the disbursement of direct funding to Micron for the Proposed Project): the Preferred Action Alternative; the No Action Alternative; a Reduced Scale Manufacturing Alternative; a U.S. Route 11 Access Elimination Alternative; and six Micron Campus Site Layout Alternatives. As required under NEPA, CPO assessed whether each alternative would be technically and economically feasible and meet the purpose and need of the Proposed Action. See 42 U.S.C. § 4332(2)(C)(iii). CPO did not carry forward any of the alternatives besides the Preferred Action Alternative and the No Action Alternative for detailed analysis in the FEIS because CPO determined that each of the other alternatives would be technically or economically infeasible and/or would not meet CPO’s purpose and need. CPO conducted this assessment of reasonable

alternatives under NEPA based on its technical and economic expertise in evaluating conditions in the semiconductor manufacturing industry, the particular context surrounding DRAM and the high-bandwidth memory sector, and the Department of Commerce’s policy objectives in incentivizing domestic semiconductor manufacturing under the CHIPS Act. As noted in FEIS Section 2.2, in the context of the CHIPS Incentives Program, which CPO is responsible for administering, there is an inherent degree of overlap between consideration of an alternative’s ability to meet CPO’s purpose and need and its technical and economic feasibility and practicability, because an alternative that is not technically or economically feasible or practicable would likely result in Micron pursuing a memory campus in a lower-cost geography outside of the United States.

FEIS Section 1.1.1 (CPO Purpose and Need) provides an in-depth discussion of the context for CPO’s assessment of feasible alternatives in the EIS. This assessment is based on the Department of Commerce’s determination that a four-fab memory campus with an efficient layout at a single location would be required to ensure an economically and commercially viable operation that would meet the Department of Commerce’s economic and national security responsibilities under the CHIPS Act. As explained in FEIS Section 1.1.1, the primary driver of the need for a four-fab configuration is the need for at least 2.4 million sq. ft. of cleanroom space to manufacture increasingly complex semiconductor products at an economy of scale sufficient to compete with expanding memory campuses in East Asia. FEIS Appendix A-1 provides further in-depth information on the factors that drive this need.

Nation Comment 6a:

First, the DEIS asserts that, to be competitive and take advantage of economies of scale, Micron must build a four-fab alternative. In support, the DEIS provides data on the size of similar facilities in the United States and around the world operated by Micron and two of its competitors. According to this data, one competitor has a single facility larger than the proposed Micron project (more than 2,500,000 square feet of cleanroom) and the other has a facility comparable to the proposed Micron project (approximately 2,100,000 square feet of cleanroom). DEIS, p. 1-10, Fig. 1-1.2. The other five competitor-owned facilities shown in this figure are at or below 2,000,000 square feet of cleanroom space. Most of the facilities listed are well below this scale. While the DEIS notes proposals for additional large-scale production facilities in South Korea, no information about the stage of the proposal or the likelihood of approval is provided. DEIS, p. 1-7, fn. 7.

Response: Figure 1-1.2 in the FEIS has been revised to add bars representing the additional large-scale memory campuses in South Korea that were noted in Draft EIS p. 1-7, n. 7: SK hynix’s proposed four-fab DRAM cluster in Yongin, and Samsung’s proposed six-fab DRAM and advanced logic cluster, also in Yongin. Construction of the SK hynix four-fab memory campus is now underway.¹ The Samsung six-fab campus has received expedited government approval.² CPO

¹ “SK hynix starts fab construction in Yongin chip cluster,” *The Korea Herald* (Feb. 25, 2025), <https://www.koreaherald.com/article/10428310> (“The chipmaker plans to build four fabs to produce next-generation chips and a chip cooperation complex with more than 50 small local companies.”).

² “Yongin Semiconductor Industrial Complex Plan Receives Early Approval by Three Months,” *Power Electronics News* (Jan. 7, 2025), <https://www.powerelectronicsnews.com/yongin-semiconductor-industrial-complex-plan->

has tracked these developments and concluded that these projects have or are likely to receive continued government approvals. CPO's analysis of publicly available information on the projects' projected sizes indicates that the SK hynix campus in Yongin will include 3.6 million sq. ft. of cleanroom space³ and the Samsung campus in Yongin will include 4.8 million sq. ft. of cleanroom space,⁴ both much larger than the Proposed Project's 2.4 million sq. ft. of cleanroom space.

Samsung, SK hynix, and Micron are the three main competitors dominating the global DRAM market. As explained in Section 1.1.1, South Korea currently has a 44 percent share of the global memory chip market, whereas Micron manufactures all DRAM produced in the United States (less than one percent of global DRAM production). The x-axis in Figure 1-1.2 shows an increasing trend toward campuses that are now crossing the four-fab threshold (2.4 million sq. ft. or more of cleanroom space), reflected in the developments described above, the competitors also are continuing to add capacity to existing campuses over time. These global developments underscore the need to expand, or "onshore," domestic memory manufacturing capacity to enhance the resilience of the U.S. semiconductor supply chain to potential global disruptions. The fact that major new memory campus projects are building four or more fabs on single sites supports the need for a domestic memory campus cluster of at least four fabs to ensure an economically and commercially viable operation that would meet the Department of Commerce's economic and national security responsibilities under the CHIPS Act.

Nation Comment 6b:

The DEIS also argues that the per wafer production costs in smaller two- or three-fab facilities would be much higher, making a smaller project economically infeasible for Micron. This analysis is based on a capital asset utilization (CAU) rate as calculated for various cleanroom space represented in Appendix A, Figure A-2. Micron asserts that the CAU rate for a two-fab alternative would be 6.7% lower than for a four-fab alternative and that it would have to invest \$3.3 billion more in equipment costs to achieve the same production levels as the proposed four-fab alternative. DEIS, App. A, p. A-6.

The graph provided as Figure A-2 plots CAU against square feet of clean room space. However, neither axis has numeric markers, meaning that there is no way to determine the CAU for any particular amount of clean room space or whether a two-fab or four-fab alternative is even represented on the graph as included. In addition, the graph appears to be a flattening parabola, meaning that the incremental CAU per additional square foot of cleanroom space will approach zero at some point. Without numeric markers on either axis, it's impossible to determine at what point that might happen. It

[receives-early-approval-by-three-months/](#) ("To expedite progress, the government has accelerated the construction start date by three years and six months to December 2026, supported by fast-tracked land compensation starting in 2025. Infrastructure upgrades, including roads, water, and power, are also planned to enable the first semiconductor production plant to begin operations by 2030.").

³ See "SK hynix Board Approves Yongin Semiconductor Cluster Investment Plan," *SK hynix Newsroom* (July 26, 2024), <https://news.skhynix.com/sk-hynix-board-approves-yongin-semiconductor-cluster-plan/>.

⁴ See "Yongin Semiconductor Cluster General Industrial Complex: Set to Rise as a Global Semiconductor Leader," *Invest Korea* (May 5, 2025), https://www.investkorea.org/ik-en/bbs/i-5045/detail.do?ntt_sn=490808.

is completely impossible to evaluate the asserted 6.7 reduction in CAU rates for a two-versus four-fab alternative.

Response: The figure included in the DEIS Appendix A, Figure A-2, is intended to be illustrative of the general correlation of CAU and cleanroom space, and is not intended to be utilized as a tool for assessing the specific CAU reduction for the Micron Clay location. As a result, including the numerical values for the axis are not necessary to demonstrate the correlation. In addition to the general correlation between CAU and cleanroom space, final CAU estimates require a multifactorial analysis, which are dependent on variables such as fab location, tool mix, and numerous other considerations. The estimates included in the DEIS and confirmed in the FEIS of a CAU reduction of 6.7 percent are based on Micron confidential multifactorial analysis.

Nation Comment 6c:

The DEIS sets a domestic DRAM wafer production goal of 12% of global DRAM manufacturing capacity, which translates into a weekly production rate of 13,000 DRAM wafers by 2028 and 52,000 by 2045. DEIS, p. 1-8. However, the only data cited that ties DRAM wafer use to critical economic and national security interests is a single estimate by the Boston Consulting Group, which the DEIS characterizes as asserting that 11% of the global memory chip output is used by “applications that are critical to U.S. economic and national security” interests. DEIS, App. A, p. A-4. This characterization does not appear to be supported by the cited report.

In reviewing the cited report, the reported 11% figure is not apparent. The report includes an exhibit labeled “Example: How the US could establish a minimum viable capacity to address its critical strategic risk in advanced logic manufacturing,” which asserts that 9% of US semiconductor consumption in 2019 was consumed by “critical infrastructure.” (Varas et al, 2021, p. 48, Exh. 22.) This critical infrastructure is defined to include defense and aerospace; telecom networks; energy, security and medical equipment; and data centers of government and essential sectors. (Id.) Our review did not find any obvious economic or defense uses of microchips that should be added to the 9% figure or any discussion of critical strategic needs at the DEIS-reported 11% level.

Response: The statement citing the Boston Consulting Group/Semiconductor Industry Association (BCG/SIA) report in FEIS Appendix A-1 has been corrected to state that 9 percent of the global memory chip output is consumed by applications that are critical to U.S. economic and national security. However, the relevant section of the BCG/SIA report found that two to three logic fabs would need to be built in the United States to cover expected domestic consumption of advanced logic chips for critical infrastructure applications by 2030. Due to the comparatively greater capital intensity of memory fabs, this translates to the need for four to six memory fabs in the same timeframe.

As explained in FEIS Appendix A-1, historical investment data was analyzed showing that DRAM memory chip manufacturing requires, on average, approximately 2.05 times the capital intensity of logic chip manufacturing (Yoon, 2021), which drives memory cleanroom size. In general, an economically viable logic operation requires approximately 300,000 sq. ft. of cleanroom space, whereas the typical memory operation requires approximately 600,000 sq. ft. of cleanroom space.

As further noted in FEIS Appendix A-1, the BCG/SIA report made the following specific estimate in 2021, as stated at p. 48 of that report: “We estimate that covering the expected domestic consumption of advanced logic chips for critical infrastructure applications by 2030 would require building just 2-3 new state-of-the-art [logic] fabs in the US” (Varas et al., 2021). The Department of Commerce considered the BCG/SIA estimated need for domestic logic chip production in the context of a separate CPO award to TSMC Arizona Corporation to construct three leading-edge logic fabs in Arizona with 900,000 sq. ft. of cleanroom space. Given the need for memory chips to support critical infrastructure running on logic chips, and that memory chip manufacturing requires, on average, approximately double the capital intensity compared to logic chip manufacturing, the domestic need for three logic fabs to supply critical infrastructure applications (900,000 sq. ft. of cleanroom space) translates to the need for six memory fabs to support those same applications (3.6 million sq. ft. of cleanroom space). As FEIS Appendix A-1 noted, 2.4 million sq. ft. of cleanroom space is in keeping with the projected capital intensity needed to onshore memory chip production at pace consistent with logic chip production. This is why, as noted in Section 1.1.1, although the Department of Commerce’s final award to Micron only includes direct funding to support Fabs 1 and 2, the Department of Commerce based its award decision on Micron’s proposal to establish a full four-fab cluster in New York (the Proposed Project).

Nation Comment 6d:

Further, for either goal, the production is described as Micron’s nation-wide goal. Micron has recently announced plans to build a second fab at its Idaho facility and a new plant on its Virginia site . . . Given this significant expansion of Micron’s domestic chip production, the 52,000 wafer per week production goal may be met in other ways, allowing for Micron to consider a scaled-down version of its Clay facility.

Response: Micron’s recently announced plans to build a second fab at its Boise, ID location and expand production in its existing fab in Manassas, VA do not negate the need for a four-fab facility in Clay, NY. The need for those additional facilities is based on increasing economic demand for memory chip production. In this context, the need for a four-fab domestic memory campus has only grown, not diminished, even with Micron’s announcements relating to its ID and VA locations.

CPO continues to evaluate memory market trends facing Micron and its competitors. The BCG/SIA analysis, which was released in 2021, assumed a seven percent compound annual growth rate (CAGR). This forecast was made before generative AI products, such as ChatGPT, were well understood by the market. Since that time, the semiconductor industry has revised its forecast to nine percent CAGR in 2024 and 2025.⁵ The Yole Group, a market research, technology consulting, and financial advisory firm that provides strategic analysis and forecasts for the semiconductor, photonics, and electronics industries, projects that the memory industry will grow at a 10 percent CAGR from 2024 to 2030.⁶ This projection is higher than the seven percent CAGR assumption in

⁵ “Global Semiconductor Fab Capacity Projected to Expand 6% in 2024 and 7% in 2025, SEMI Reports,” *SEMI* (June 18, 2024), <https://www.semi.org/en/news-media-press-releases/semi-press-releases/global-semiconductor-fab-capacity-projected-to-expand-6%25-in-2024-and-7%25-in-2025-semi-reports>.

⁶ “Memory industry at a crossroads: why 2025 marks a defining year,” *Yole Group* (June 30, 2025), <https://www.yolegroup.com/strategy-insights/memory-industry-at-a-crossroads-why-2025-marks-a-defining-year/>

the 2021 BCG/SIA analysis and reflects increased growth from AI technology innovation. Another more recent analysis performed by McKinsey in 2024 concluded that, by 2030, “the generative AI boom globally will require . . . an additional six to 18 new memory fabs.”⁷ Based on the projection from McKinsey, an average of two new memory fabs will need to come online in the United States every five years to meet the most critical needs. Tesla is sourcing \$16.5 billion of AI logic chips,⁸ which will need to be paired with HBM products. NVIDIA, the industry leading provider of AI hardware solutions, recently announced revenue of \$44.1 billion, up 12 percent from Q4 and up 69 percent from a year ago, for Q1-26 results, showing continued growth in AI demand.⁹ NVIDIA’s hardware solutions use Micron memory.¹⁰

AI workloads require HBM chips, which take more steps to produce than traditional DRAM chips, such as double-data rate (DDR) 4 and DDR 5 products. HBM products require more manufacturing steps due to their speed requirements, the need to stack HBM chips into modules using Through-Silicon-Via technology, and other performance requirements. See also FEIS Section 1.1.1. Each AI module (i.e., an AI product containing a logic chip plus memory chips) requires dozens of HBM chips.¹¹

(“DRAM continues to lead in both scale and growth potential, with High-Bandwidth Memory (HBM) becoming the centerpiece of this transformation”).

⁷ “More new logic fabs needed to fill the looming supply shortage in AI chips by 2030: McKinsey – Memory chips are also likely to face supply woes,” *Manufacturing Asia* (2024), <https://manufacturing.asia/manufacturing/in-focus/more-new-logic-fabs-needed-fill-looming-supply-shortage-in-ai-chips-2030-mckinsey>.

⁸ “Tesla-Samsung \$16.5 billion supply deal may spur chipmaker’s US contract business,” *Reuters* (July 28, 2025), <https://www.reuters.com/business/tesla-samsung-165-billion-supply-deal-may-spur-chipmakers-us-contract-business-2025-07-28/>.

⁹ “NVIDIA Announces Financial Results for First Quarter Fiscal 2026,” *NVIDIA* (May 28, 2025), <https://nvidianews.nvidia.com/news/nvidia-announces-financial-results-for-first-quarter-fiscal-2026>.

¹⁰ “Powering AI With Micron’s HBM3E: The World’s Fastest and Largest 8Hi Memory (Presented by Micron Technology),” *NVIDIA* (Mar. 2024), <https://www.nvidia.com/en-us/on-demand/session/gtc24-expt63008/>.

¹¹ See, e.g., Yang, Heekyong and Hyunjoon Jin, “Tesla-Samsung \$16.5 Billion Supply Deal May Spur Chipmaker’s U.S. Contract Business,” *Reuters* (July 28, 2025), <https://www.reuters.com/business/tesla-samsung-165-billion-supply-deal-may-spur-chipmakers-us-contract-business-2025-07-28/>; “SK Hynix Board Approves Yongin Semiconductor Cluster Investment Plan,” *SK Hynix* (July 26, 2024), <https://news.skhynix.com/sk-hynix-board-approves-yongin-semiconductor-cluster-plan/>; “Micron Sees New Singapore Plant as Key in Plan to Meet Rising Demand for AI-enabling Chips,” *The Business Times* (July 3, 2025), <https://www.businesstimes.com.sg/companies-markets/telcos-media-tech/micron-sees-new-singapore-plant-key-plan-meet-rising-demand-ai-enabling-chips>; Bertolazzi, Simone and Josephine Lau, “Memory Industry at a Crossroads: Why 2025 Marks a Defining Year,” *Yole Group* (June 30, 2025), <https://www.yolegroup.com/strategy-insights/memory-industry-at-a-crossroads-why-2025-marks-a-defining-year/>; “Yongin Semiconductor Cluster General Industrial Complex: Set to Rise as a Global Semiconductor Leader,” *Kotra, Invest Korea* (May 9, 2025), https://www.investkorea.org/ik-en/bbs/i-5045/detail.do?ntt_sn=490808; “Global Semiconductor Fab Capacity Projected to Expand 6% in 2024 and 7% in 2025, Semi Reports,” *Semi* (June 18, 2024), <https://www.semi.org/en/news-media-press-releases/semi-press-releases/global-semiconductor-fab-capacity-projected-to-expand-6%25-in-2024-and-7%25-in-2025-semi-reports#:~:text=MILPITAS%2C%20Calif.,in%20turn%20encourages%20further%20investment.%E2%80%9D>; “More New Logic Fabs Needed to Fill the Looming Supply Shortage in AI Chips by 2030,” *Manufacturing Asia* (2024), [THE ELEC \(Dec. 12, 2021\), <https://thelec.net/news/articleView.html?idxno=3684>; Varas, Antonio, et al., “Strengthening the Global Semiconductor Supply Chain in an Uncertain Era,” *BCG, Semiconductor Industry Ass’n* \(April 2021\), \[bcgasia-strengthening-the-global-semiconductor-value-chain-april-2021.pdf\]\(https://www.bcg.com/publications/2021/semiconductor-industry-association-report-strengthening-the-global-semiconductor-value-chain-april-2021\).](https://manufacturing.asia/manufacturing/in-focus/more-new-logic-fabs-needed-fill-looming-supply-shortage-in-ai-chips-2030-mckinsey#:~:text=transforming%20server%20architecture,-.More%20new%20logic%20fabs%20needed%20to%20fill%20the%20looming%20supply.as%)

Micron plans to manufacture a mix of these products in New York, and the HBM requirements for these products are anticipated to create upward pressure on the amount of cleanroom space required to meet growing market demand, which is why Micron has announced an additional fab in Idaho. The announced expansion of production of the fab in Virginia contains a different product mix than the planned New York fab. The Virginia fab produces legacy nodes, instead of the leading-edge DRAM and HBM chips planned for New York.

In sum, based on CPO's technical and economic expertise in evaluating conditions in the semiconductor manufacturing industry, the particular context surrounding the DRAM and high-bandwidth memory sector, and the Department of Commerce's policy purposes in incentivizing domestic semiconductor manufacturing under the CHIPS Act, CPO disagrees with the assertion that the memory chip production need analyzed in the FEIS may be met through a reduced-scale alternative for the Proposed Project, which is why CPO did not carry forward that alternative for detailed analysis in the FEIS. The need for a four-fab memory campus for U.S. national and economic security purposes has not changed following Micron's ID and VA announcement.

Nation Comment 7:

The Nation asserts that the Draft EIS improperly relies on compliance with applicable laws and regulations to find that environmental impacts are not significant. The Draft EIS should be amended to eliminate all claims that legal compliance translates into an absence of significant adverse impacts. Instead, the Draft EIS should incorporate quantitative or qualitative estimates of the contaminants that may be discharged into air or water or that may be released from solid and hazardous wastes or hazardous materials and then discuss the likely environmental and public health impacts of exposure to those contaminant levels.

Response: The lead agencies have taken a hard look at the reasonably foreseeable impacts of the Proposed Project on air, water and human health. While the DEIS properly acknowledges and considers the various permitting that will be required, which, in many instances, is proceeding on a simultaneous path, the lead agencies have not determined that compliance with permitting requirements necessarily translates into non-significance. In many instances, it is the specific permitting regime, with required minimization and mitigation measures, coupled with the nature of the impact summarized in the DEIS and Micron's commitments to BMPs, that were used to determine whether significant impacts remain. Where compliance with applicable law and permits provides support for a conclusion of no significant impact, it is appropriate to reference such obligations. Where significant impacts remain, the lead agencies have required implementation of additional mitigation as identified in the FEIS beyond compliance with applicable laws and regulations. See FEIS Table 3.17-1.

Nation Comment 8:

PFAS, which is recognized as an emerging contaminant with the potential to cause significant harm to human health and the environment at very low levels of exposure, is not well understood or properly regulated. Although the Draft EIS discusses the evolving legal standards for PFAS at both the state and federal level, it fails to plainly state that the vast majority of PFAS compounds are unregulated.

Response: The lead agencies fully recognize the evolving nature of the PFAS regulatory regime as more and more technical information becomes known and alternatives and detection and control measures are discovered. Appendix L-1 further addresses this concern. This Appendix describes the various PFAS definitions, analytical techniques for measuring the presence of PFAS, the current regulatory framework for managing PFAS, intended uses of PFAS at the Proposed Project, wastewater treatments under evaluation, air emissions controls, recycling and disposal frameworks, and overall chemical management practices for responsible use of these critical substances at the Micron Campus.

Recognizing that the regulatory requirements for PFAS are continuing to develop and subject to change, the DEIS identifies and discusses the laws and regulations to which the Proposed Project will be subject, including air emission permitting, wastewater permitting and accompanying monitoring, required spill prevention protocols, and the reporting regimes that accompany federal, state and local regulatory programs. These programs include regulation of PFAS, as discussed in FEIS Section 3.8.3.2. and Appendix L-1. These sections also discuss the review of PFAS treatment options that go beyond what is currently legally mandated. The options under review are not limited to treatment of only those PFAS that are currently regulated or for which approved analytical methods exist. PFAS also would be addressed cumulatively by the other regulatory controls, including appropriate storage and handling of chemicals, and spill prevention planning, as discussed in the FEIS. NYSDEC also requires PFAS monitoring as provisions in its wastewater permits, including quarterly sampling for approximately 40 compounds using EPA Method 1633/1633A and leveraging state guidance values (e.g., 10 ppt for PFOA/PFOS).¹² Any potential future regulation of PFAS is speculative and beyond the scope of the FEIS, though Micron must continue to comply with all applicable law and will explore technological innovation to reduce or eliminate PFAS from semiconductor manufacturing, where feasible.

Nation Comment 9:

The representative nature of air quality data from Rochester should be verified with some local monitoring data.

Response: See also Response to Air Quality Comment 4. No verification is necessary. Compliance with the NAAQS thresholds are determined by USEPA based on ambient air monitoring. DEIS Section 3.6.3.2 demonstrates compliances with NAAQS thresholds for regulated criteria pollutants under a conservative approach based on preliminary design information assuming all four fabs are operational, although initially construction and operation of only Fabs 1 and 2 is expected. As further discussed in FEIS Section 3.6 and Appendix I, the proposed Micron Campus is located in a more rural area compared to the location of the air monitors in Rochester and Syracuse, and, therefore, the ambient background air quality in the Rochester and Syracuse monitoring locations is a conservative representation of background concentrations in the area of the Proposed Project area.

¹² See <https://dec.ny.gov/environmental-protection/water/emerging-contaminants>.

Nation Comment 10:

The Nation commented that, other than an assessment of combined stationary and mobile source impacts on particulate matter, the air quality assessment does not seem to consider the potential for localized air quality impacts from facility operations alone or from the combination of facility and traffic emissions.

Response: FEIS Chapter 3.6 provides a comprehensive analysis of emissions associated with both the construction and operational phases of the Proposed Project. This includes evaluation of criteria pollutants (e.g., volatile organic compounds (VOCs), particulate matter (PM), hazardous air pollutants (HAPs)) and regulated non-criteria pollutants from both stationary and mobile sources. These analyses were conducted in the context of Clean Air Act thresholds and regulatory guidance concentrations designed to protect human health. The FEIS demonstrates that all projected emissions remain below applicable health-based regulatory thresholds and guidance concentrations throughout both phases of the Proposed Project. Therefore, the Proposed Project is not expected to result in significant adverse impacts to air quality in the surrounding community. As concluded in FEIS Section 3.6.5, Summary of Effects:

Construction activities associated with the Proposed Project components would result in temporary adverse, direct impacts to air quality. In addition, based on the regulatory requirements for preconstruction and operational air quality permitting and compliance, the emissions controls inherent to the Proposed Project operations, and the confirmation through atmospheric dispersion modeling that stationary sources associated with the Proposed Project would not cause or contribute to an exceedance of any applicable NAAQS, AGC or SGC, the stationary and mobile source emissions from construction and long-term operation of the Proposed Project would not have a significant adverse effect on air quality. The potential effects on air quality from induced growth anticipated from the Proposed Project would not cause a significant adverse effect within the five-county region.

Nation Comment 11:

The Nation commented that there is no mention of air modeling for PFAS or contaminants specifically identified as PFAS byproduct.

Response: As discussed in FEIS Chapters 3.6. and 3.7, the Micron Campus will be a stationary source of air pollutants and will be subject to rigorous permitting and emissions controls. Although there are no specific federal or state standards for PFAS air emissions individually or as a group, air pollutants (including PFAS) have been evaluated. The Micron Campus will use highly segregated exhaust systems to manage emissions from various processes routed to source specific control devices, such as point-of-use (POU) abatement, process equipment exhaust conditioners (PEECs), to manage emissions directly at the source. These exhausts may contain unreacted input

materials and reaction byproducts, such as PFAS byproducts formed during semiconductor fabrication. All process emissions will be routed to control systems with built-in redundancy to ensure safety and compliance.

The Micron Campus is expected to be classified as a major source under the Prevention of Significant Deterioration (PSD) Program, requiring the implementation of Best Available Control Technology (BACT) for pollutants like carbon monoxide, nitrogen oxides, and fluorinated greenhouse gases (F-GHGs), some of which may be considered PFAS. These pollutants will be treated using controls like regenerative catalytic systems or POU thermal oxidizers with up to 99% destruction efficiency. FEIS Section 3.7.3.2 discusses potential emissions and emissions controls for F-GHGs, including certain PFAS. Air dispersion modeling for individual fluorinated compounds is presented in Appendix I, which confirms compliance with regulatory guidance concentrations for all applicable compounds. As discussed in FEIS Appendix L-1, New York's air toxics program regulates non-criteria pollutants, including PFAS, using annual (AGC) and short-term guideline (SGC) concentrations developed based on best available science. Micron also plans to minimize fugitive emissions from heat transfer fluids and refrigerants through efficient design, monitoring, and maintenance. The Proposed Project will undergo a Climate Leadership and Community Protection Act (CLCPA) Analysis by the NYSDEC including F-GHGs that may be considered PFAS to ensure alignment with state climate goals. A copy of the CLCPA analysis is included as Appendix J-2 of the FEIS. Additionally, the semiconductor industry is actively developing technologies to reduce PFAS emissions, including alternative chemistries, process optimization, and recycling systems, which will be reflected in the Micron Campus's air permit.

Nation Comment 12:

The Nation commented that the Draft EIS does not consider the risk of upset, exceedance, or other violations of air emission permits. According to the Nation, no equipment works perfectly and exceedances of permit terms are fairly common during start-up, shutdown, or maintenance procedures.

Response: NYSDEC air permitting requirements include mandatory emissions reporting, certification, and compliance monitoring to ensure that emissions remain within permitted thresholds and regulatory limits. Through this regulatory framework, the Proposed Project is subject to oversight designed to prevent, detect, and mitigate any adverse air quality impacts, thereby protecting public health and the environment.

Nation Comment 13:

The Nation urged the lead agencies to mandate on-going, local air monitoring to provide confirmation that the Micron project is not creating regional or local air quality impacts.

Response: There are numerous federal, state and local entities permitting and monitoring Micron facilities during both construction and operation of the Proposed Project. For example, the Clean Air Act and New York state laws and regulations require USEPA monitoring, assessment, and reporting of ambient air quality and compliance with the NAAQS. NYSDEC air permitting

requirements include emissions reporting and certification to ensure compliance with permit thresholds and regulatory limits. Site specific monitoring, recordkeeping, and reporting requirements will also be included in an Title V air permit issued by NYSDEC and will require air emission monitoring reports and certifications to be submitted to NYSDEC to ensure compliance with permit and regulatory thresholds and limits. USEPA and NYSDEC maintain ongoing authority to monitor and ensure compliance with all air permit and applicable air quality requirements and compliance with the NAAQS, and deviations from permit requirements must be reported to NYSDEC. See also Response to Air Quality Comment 12.

Nation Comment 14:

The Nation commented that the Draft EIS provides very limited information on the specific types and quantity of hazardous materials, including PFAS, that may be used within the Micron project, the types and quantity of hazardous wastes that are likely to be generated, or the final fate of these wastes.

Response: FEIS Table 3.8-10 lists the quantities and storage methods for specific types of liquid and gaseous chemicals that would be stored on-site. Table 3.8-9 lists the types of hazardous materials that would be used in the manufacturing process at the Micron Campus, the potential hazards associated with each part of the process, and the controls that would be used to protect worker and public health and safety. Future permitting or reporting may identify additional chemicals to be used. See also Responses to Solid and Hazardous Materials Comments 9 and 10.

FEIS Table 3.8-8 shows the various types of hazardous and universal waste material the Micron Campus would generate and anticipated management or disposal methods and locations. Micron would manage hazardous and universal materials through its or reduce, reuse, and recycle RRR Program to the greatest extent practicable to reduce the volume of material that would need to be managed as hazardous waste for disposal.

FEIS Section 3.8.3.2 and new Appendix L-1 describe the types and instances where PFAS compounds generally will be used in the semiconductor manufacturing process. Some forms or types of PFAS to be used or discharged are not provided due to the highly proprietary nature of this information or are not yet confirmed at this point in the Project development process. Regulatory agencies with permitting authority will have confidential access to specific PFAS compounds used at the Micron Campus and thus would have the ability to assess whether the treatment technology used for the Proposed Project is sufficient to achieve compliance with applicable laws and regulations.

Permitted private hazardous waste haulers would collect hazardous waste generated by the Proposed Project and bring it to facilities authorized by NYSDEC or analogous out-of-state regulatory agencies for the disposal of hazardous waste in accordance with RCRA regulations. Micron would use a variety of local, regional, and national waste disposal and materials reuse vendors to appropriately manage hazardous waste and other materials. Micron anticipates that hazardous waste would be sent out-of-state for disposal. Micron would be responsible for selecting specific vendors and disposal facilities as the Proposed Project progresses.

Certain waste streams such as lab waste, cylinders, expired materials, glues, resins, a subset of solvents, and certain acids would likely need to be incinerated at permitted off-site disposal facilities in other states. Micron anticipates using Veolia as its primary RRR materials and waste disposal vendor, but Micron would be responsible for selecting all waste and RRR vendors as needed during operations.

Nation Comment 15:

Recognizing that Micron may not be able to project the full list of materials or the specific quantities of each to be used in for the project, it commented that data on the typical materials used and wastes generated by similar chip manufacturing facilities – either from industry-wide reporting or from prior Micron experience in the field – must be available and should be provided and analyzed.

Response: See Response to Solid Waste and Hazardous Materials Comment 9.

Nation Comment 16:

The Draft EIS must review specific data on the likely types and quantities of PFAS compounds that will be used and discharged or disposed of by the Micron Project.

Response: See Response to Solid Waste and Hazardous Materials Comment 9. Descriptions of the types of chemicals used onsite, including the types of PFAS used in semiconductor fabrication, have been provided in FEIS Section 3.8.3.2 and Appendix L-1. Appendix L-1, which has been added to the FEIS in response to comments, provides further detail on where PFAS are used in semiconductor fabrication, the types of PFAS used in such processes, the functionality of PFAS in these processes, the categories of PFAS that may be found in wastewater, the review of wastewater treatment technologies, and the management and disposal framework that will be applied at the Proposed Project. The identity of specific PFAS compounds used in the semiconductor manufacturing process are not provided due to the highly proprietary nature of this information. Also, specific chemicals to be used at the Micron Campus are not yet confirmed at this point in the Proposed Project development process. However, the identities of specific PFAS compounds are not required to assess reasonably foreseeable significant adverse impacts of the Proposed Project. Sufficient information has been provided to identify PFAS use and management, and to address the potential risks and procedural controls in place to manage the risk associated with using these materials. Additional information on PFAS substances used in semiconductor manufacturing is available on the Semiconductor PFAS Consortium website at www.semiconductors.org/pfas, including “Background on Semiconductor Manufacturing and PFAS” (May 17, 2023).

Nation Comment 17:

The potential for PFAS in on-site IWWTP sludge and need for IWWTP sludge to require special handling should be addressed.

Response: Micron’s industrial wastewater discharge permit (IWDWP) to the IWWTP will include specific pretreatment permit limits for PFAS that limits discharge of these compounds to the IWWTP. To comply with these limits, Micron will be required to manage and pretreat wastewater

at the Micron Campus before discharge to the IWWTP. Sludge generated at the IWWTP will be managed and disposed of in accordance with all applicable laws and regulations.

FEIS Sections 3.3.4.2 and 3.8.3.2, as well as the new Appendix L-1, identify and discuss a range of wastewater treatment technologies and materials management and disposal options that Micron is considering for the different types of materials that may be generated at the Proposed Project, which may include PFAS-containing sludge or other materials. USEPA's current "Interim Guidance on the Destruction and Disposal of Perfluoroalkyl and Polyfluoroalkyl Substances and Materials Containing Perfluoroalkyl and Polyfluoroalkyl Substances" ([Interim Guidance on the Destruction and Disposal of Perfluoroalkyl and Polyfluoroalkyl Substances and Materials Containing Perfluoroalkyl and Polyfluoroalkyl Substances--2024](#)) describes the agency's latest assessment of available methods for treatment and management of PFAS-containing materials. Micron will use this and other guidance to assess suitable methods for disposal and management of PFAS-containing material and will comply with applicable law for the safe and proper disposal of any generated solid and hazardous waste.

Nation Comment 18:

The Nation commented that the Draft EIS improperly dismisses the potential impacts of industrial pollution on groundwater and connected surface water, particularly given the potential for karst structures in the area. The Draft EIS discusses the potential for ground or surface water contamination from spills, uncontrolled discharges, or stormwater runoff on the project site in a fairly superficial way and improperly minimizes the potential for broad groundwater contamination from plant operations.

Response: The FEIS documents and analyses the potential impacts of industrial pollution on groundwater and connected surface water in Section 3.3.4.2. There are no karst features found in the WPCP. The FEIS did not identify any broad groundwater contamination from the Proposed Project activities; the only potential for surface or groundwater contamination would come from spills, accidents, and improperly managed stormwater at the WPCP. These concerns are addressed by the SWPPP and discussed in the FEIS Section 3.3.4.2 and Appendix F-8. Further, as discussed in FEIS Section 3.3.4.2, Micron has installed groundwater monitoring wells to ensure that assumptions regarding subsurface are the same as expected. See also Response to Geology and Soils Comment 1.

Nation Comment 19:

The Draft EIS should be revised to address the potential presence of karst features in the project area or the potential for "karstification" over time.

Response: As noted in FEIS Section 3.2.2.1, geophysical testing completed within the WPCP, including seismic refraction surveying and MASW testing, did not suggest the presence of karst features. See also Response to Nation Comment 18; Geology and Soils Comment 1.

Nation Comment 20:

Data on spills, violations, upsets, and exceedances within the domestic semiconductor industry as a whole or within Micron facilities generally be reviewed to create a more grounded and fact-based assessment of water pollution risks.

Response: See Response to Water Resources Comment 40, 41 and 47. In addition, see Response to Solid Waste and Hazardous Materials Comment 48. Historic data from Micron manufacturing facilities were used to develop a detailed understanding of potential water pollution risks, as well as required processes for managing chemicals used at the Micron Campus.

NYSDEC, via the SPDES permitting process, will determine the discharge permit effluent limit specifications for Oak Orchard WWTP in accordance with federal, state, and local guidelines to protect surface waters. The OCDWEP IWDP for Micron, established through its Industrial Pretreatment Program, will include limits for PFAS and other pollutants prior to discharge by Micron to the Oak Orchard IWWTP. This discharge will be closely and routinely monitored to ensure compliance with the Pretreatment Limits set forth in the OCDWEP issued IWDP to Micron in order to protect Oak Orchard IWWTP Treatment Processes and ensure compliance with NYSDEC established SPDES permit discharge limits.

Nation Comment 21:

The Draft EIS fails to provide specific mitigation plans or to properly consider harm related to loss of habitat connectivity or the potential impacts of off-site project-related effects, such as increased traffic or open-space development for new commercial spaces or housing.

Response: See Response to Biological Resources Comment 9. A detailed Wetlands Mitigation Plan is attached as Appendix N to Micron's CWA Sec. 404 permit, and has been included as Appendix F-7-1 to the FEIS. The goal of the Mitigation Plan is to describe how Micron will fully replace the suite of lost functions and services the on-site wetlands provide that would be impacted by construction of the Micron Campus.

The Mitigation Plan adheres to all applicable federal and State wetland mitigation regulations. USACE and the NYSDEC have evaluated each distinct wetland on the WPCP for its current cover type and condition to determine the number of credits/acres that would be needed to offset the impact. In general, mitigation will be designed to improve the wetland and stream functions and services over those lost, increasing both the quantity and quality of wetlands and streams within the larger watershed as a result of implementing the Proposed Project. As part of the Mitigation Plan, the Wetland Trust will also be required to implement comprehensive wetland monitoring techniques and to meet stringent wetland development criteria.

Regarding habitat connectivity, the Proposed Project incorporates design and mitigation strategies intended to reduce impacts on habitat connectivity. These include maintaining and enhancing buffer zones, implementing a Landscape Management Plan using native species where feasible,

preserving key habitat corridors where feasible, and implementing off-site conservation measures to support regional ecological integrity. See FEIS Table 3.4-8.

Nation Comment 22:

Additional analysis of the adequacy of the proposed wetlands mitigation is necessary.

Response: No additional analysis is required. See Response to Water Resources Comment 6. The Wetlands Trust Stream/Wetland Mitigation Plan, which is attachment B to Appendix N to Micron's CWA Sec. 404 permit, and has been included in Appendix F-7 of the FEIS. Section 4.1 of the Mitigation Plan describes the selection and design criteria that have been used to identify mitigation sites in accordance with the 2008 United States Army Corps of Engineers Compensatory Mitigation Rule. Environmental due diligence and historical investigations of each of the mitigation sites have been performed as required by the 2008 Compensatory Mitigation Rule that governs compensatory mitigation requirements for unavoidable impacts. The mitigation sites have been selected based upon proximity to the unavoidable impacts and within similar HUC-8 watershed, specifically the Oneida River watershed. As required by the 2008 United States Army Corps of Engineers Mitigation Rule, site selection of potential mitigation sites undergoes significant scrutiny by the regulatory agency and is required to meet certain site selection criteria to be an eligible mitigation site for compensatory mitigation requirements.

Nation Comment 23:

Several issues should be more explicitly addressed as the Draft EIS makes no effort to quantify the ecological value of these developing wetlands over time, compare them to the value of an established wetland forest, or determine when the ecological value of the developing wetlands will reach the value of the existing wetlands.

Response: See Response to Water Resources Comment 10. The factors associated with diversity of wetland systems and composition of wetlands communities have been taken into consideration as part of the proposed Mitigation Plan. See FEIS Appendix F. The Mitigation Plan takes temporal considerations associated with a mature and developing wetland system into account in determining the required compensatory mitigation.

Nation Comment 24:

The DEIS also pays limited attention to how the remaining wetlands on the Micron Project site will be affected by the overall project.

Response: See Response to Water Resources Comment 18. As described in FEIS Sections 3.3.4.2 and 3.4.4.2, the Wetland Adaptive Management Plan will be designed specifically for the Micron Campus to ensure that the remaining wetlands are actively monitored and protected throughout the life of the project. This plan includes comprehensive monitoring of both groundwater and surface water levels in the surrounding area before, during, and after construction. The data collected will inform Micron of any necessary adaptive management strategies to address potential long-term adverse impacts on wetland hydrology and ecological function.

In addition to monitoring, the plan will guide the implementation of stormwater management BMPs designed to minimize post-construction runoff impacts. These BMPs will be developed and maintained in accordance with the New York State Stormwater Management Design Manual, ensuring compliance with state standards and protection of wetland resources.

By integrating adaptive management and regulatory compliance into the project's design and operations, Micron aims to proactively address potential impacts to the remaining wetlands and support their long-term ecological integrity.

Nation Comment 25:

The Draft EIS fails to consider that disruptions to ground and surface water flow on the Micron Project site will almost certainly affect groundwater recharge to the remaining wetlands on site and even to adjacent wetlands.

Response: See Response to Nation Comment 24.

Nation Comment 26:

The DEIS also gives short shrift to the analysis of the flood-related or other impacts of wetland loss, increase in impervious surfaces, artificial stormwater flow under a stormwater management plan, and other related surface and groundwater flow changes on adjacent properties.

Response: The FEIS acknowledges the importance of thoroughly evaluating the reasonably foreseeable hydrologic impacts of wetland loss, increased impervious surfaces, and changes in surface and groundwater flow resulting from the Proposed Project. The FEIS addresses these concerns through a comprehensive stormwater management and wetland protection strategy, as outlined in Chapter 3.3 and Appendix F.

Stormwater design and permitting will comply with NYSDEC requirements in effect at the time of permit submittal for each project phase. Stormwater Management Practices (SMPs) will be implemented to:

- Preserve existing drainage patterns to the greatest extent practicable;
- Maintain conveyance of upland watershed runoff;
- Control increases in stormwater volume;
- Prevent soil erosion and sedimentation;
- Reduce runoff through green infrastructure where feasible.

To mitigate downstream flood risks, wet extended detention ponds and bioretention filtration areas will be incorporated to reduce stormwater runoff volumes and peak flows. These measures also support water quality protection by maintaining the integrity of stormwater systems and reducing pollutant loads.

Wetlands permitting will follow applicable NYSDEC and USACE requirements. The larger wetland complexes W34 and W35 were identified as having a primary function of floodflow alteration—defined by USACE as the ability to attenuate floodwaters for prolonged periods following precipitation events. See FEIS Appendix F-3.1.1; see also FEIS Table 3.3-5.

To preserve these critical hydrologic functions, the proposed project layout has been designed to avoid impacts to W34 and W35 to the greatest extent possible. Specifically, the project will avoid disturbances to:

- 33.35 acres of federal jurisdictional wetlands and 33.37 acres of state jurisdictional wetlands in W34;
- 157.36 acres of federal and state jurisdictional wetlands in W35.

While the FEIS provides a foundational analysis of hydrologic impacts, additional detailed modeling and site-specific evaluations will be conducted during final design and permitting phases. These will include assessments of floodplain dynamics, groundwater recharge, and downstream flow conditions to ensure that adjacent properties and ecosystems are not adversely affected.

Micron remains committed to implementing adaptive management strategies and coordinating with regulatory agencies to ensure that stormwater and wetland impacts are effectively mitigated and monitored throughout the life of the project.

Nation Comment 27:

The Draft EIS does not assess the availability of suitable habitat within the migratory range of affected mammals or birds. It also fails to consider the effects of other changes in the area on wildlife.

Response: See Response to Biological Resources Comment 40. FEIS Section 3.4.4.2 acknowledges the impacts of construction of the Proposed Project.

To mitigate these effects, Micron will implement several measures, including maintaining vegetated buffer habitats near sensitive ecological communities (e.g., remaining wetlands and surface waters) where feasible. See FEIS Table 3.4-8. These buffers are intended to support habitat connectivity and reduce edge effects. Micron has also committed to BMPs for biological resources that include the retention of approximately 380 acres on the Micron Campus, including approximately 272 nearly contiguous acres of forested habitat. See FEIS Section 3.4.5.1.

Nation Comment 28:

The proposed mitigation measures to reduce “unavoidable significant adverse effects” on bats and birds lack sufficient information to assess the likely effectiveness of the mitigation proposals. Additional details on the mitigation proposals and an analysis of

their likely effectiveness is necessary to support the assertion that the proposals will sufficiently reduce unavoidable significant and adverse impacts of the Micron project.

Response: See Response to Biological Resources Comment 17. The lead agencies acknowledge the concerns regarding unavoidable adverse effects from construction activities and lighting on bat species, particularly the federally listed Indiana bat and Northern long-eared bat. To address these concerns, Micron has been required to develop detailed Mitigation Plans, as outlined in Appendix F and Appendix G of the FEIS, to minimize and offset impacts.

All biological resource impacts will be mitigated in accordance with consultation with the USFWS and the Endangered Species Act (ESA). FEIS Section 3.4.5.1 describes BMPs to reduce impacts to threatened and endangered species, including:

- Retention of on-site roosting and foraging habitat where feasible,
- Noise and lighting reduction to reduce the potential for disturbance of bats in adjacent areas of habitat,
- Water quality protection,
- Biological monitoring to oversee implementation of BMPs.

The Draft Biological Assessment (Appendix G-4) assumes light-averse behavior for the Indiana bat, northern long-eared bat, and tri-colored bat, and evaluates lighting impacts accordingly. Additional mitigation measures described in FEIS Section 3.4.5.2 include:

- Off-site habitat protection at a 2:1 ratio, conserving approximately 1,182 acres of bat roosting habitat,
- Artificial roost site installation following best practices,
- Research and monitoring projects developed in consultation with USFWS and NYSDEC,
- Micron-funded conservation grant program to support long-term bat conservation,
- Gating of hibernacula to prevent human disturbance,
- Acoustic bat monitoring to track species activity and presence.

These measures are designed to minimize disruption to bat foraging and roosting behavior and to support long-term conservation of bat populations in the region. Micron will be required to implement these strategies in coordination with USFWS and NYSDEC to ensure compliance and ecological stewardship.

Nation Comment 29:

The DEIS should be revised and expanded to consider the state-wide impacts of Micron's massive electricity demands, the actual shortfall in power likely in the future given increasing electricity demands and limited increases in electricity supply in the region and state-wide, and the potential expansion of nuclear power generation in upstate New York to meet the power demands of the Micron Project.

Response: See Response to Utilities Comment 1. FEIS Section 3.10 discusses the planning process that ensures adequate utility capacity to meet energy demand in New York State. That process, governed by the New York Independent System Operator (NYISO), ensures that there is adequate capacity to meet existing and projected demand so there is not a tradeoff between the Proposed Project and the demand for other users in the community. See also FEIS Section 3.10.4.

Given the robustness of statewide and utility-level planning processes, it is anticipated that future electricity needs—both for Micron’s project and broader statewide growth—will be adequately addressed. See FEIS Section 3.10.3.2.

Nation Comment 30:

The Three Rivers Area just west and south of the proposed Micron project and a stone’s throw from the connected actions at Oak Orchard Wastewater Treatment Plant, was an historic meeting place for Onondaga Nation citizens scattered across the Nation’s traditional territory and for meetings of the larger Confederacy. For all of these reasons, the Nation holds this area to be sacred. Any development that might disturb historic sites or cause damage to the natural world here is of particular concern.

Response: Ongoing consultation with the Onondaga Nation as a Section 106 Consulting Party for the Proposed Project and Connected Actions will continue throughout the Section 106 process.

Nation Comment 31:

The Draft EIS should require Micron to make detailed information about the hazardous or potentially hazardous materials used on or generated by the site for the life of the project.

Response: See Response to Solid Waste and Hazardous Materials Comment 4, 9. Micron’s implementation of the Proposed Project would be subject to multiple federal and State regulations (RCRA, HMTA, EPCRA, CAA, TSCA, NYCRR Part 360, etc.) and extensive plans and procedures (e.g., RMP, CWMP, Waste Management Plan, SMMP, SPCC Plan/SPR, SWPPP, etc.) developed pursuant to those programs to prevent environmental exposure to chemicals used for the Project. See FEIS Chapter 3.8, Table 3.8-1.

Nation Comment 32:

Micron should be required to conduct routine and on-going monitoring of the environmental impacts of this project to ensure that the assumptions about impact significance or insignificance can be verified over time.

Response: During construction, Micron will obtain a third-party environmental monitor to ensure compliance with all applicable laws, regulations, and project commitments. During operations, Micron is required to obtain and comply with all applicable environmental permits in order to operate (e.g., a State Pollution Elimination Discharge permit (SPDES) for offsite water discharge, and regular real-time monitoring of Micron’s air emissions through its Title V PSD permit).

Nation Comment 33:

Micron should be required to develop a construction mitigation plan focused on options such as fencing, appropriately timed construction, and even relocation efforts to reduce the mass mortality of reptiles, amphibians, and small mammals with limited mobility.

Response: See Response to Biological Resources Comment 8. Impacts to species associated with construction activities and the timing of those construction activities have been thoroughly evaluated in the FEIS. As described in FEIS Section 3.4.4.2, Micron would implement stormwater BMPs to help minimize the effect of the Proposed Project on biological resources. These BMPs are categorized in FEIS Table 3.4-12. These measures are designed to avoid direct harm to wildlife during sensitive periods and to preserve critical habitat features.

Nation Comment 34:

Micron should be required to generate or subsidize the generation of sufficient renewable energy to offset its power demands.

Response: The lead agencies are satisfied with Micron's commitment to purchase 100% carbon-free electricity via power purchase agreements and renewable energy credits (RECs) for the Proposed Project. See FEIS Section 0-4. As described in FEIS Chapter 2, Table 2.1-3, Micron also plans to install approximately 4 MW of solar panels on the rooftops of the parking garages and administrative buildings as part of its efforts to offset carbon emissions associated with the Proposed Project.

Though these on-site energy generation facilities would not themselves substantially offset the total grid demand associated with the Micron Campus, they do maximize efficient use of the Micron Campus for carbon-free energy generation. Micron has additionally committed to working with State entities including NYPA, ESD, and NYSERDA to identify reasonably feasible opportunities to procure new renewable or carbon-free electricity projects in New York and is also reviewing opportunities for 24/7 and/or time-matching-based renewable energy sources related to storage.

Nation Comment 35:

Micron should be required to create and support a community advisory and oversight committee which can help with on-going monitoring, environmental impacts assessment and response, and community engagement. This committee should be composed of both community members and local experts who can provide grounded information for use in and review of any continuing assessment and adaptive management at the site as well as a direct line of communication with the affected public.

Response: Micron and ESD formed the Community Engagement Committee (CEC) to solicit and identify community priorities and create a framework for directing investments in the region. Additionally, Micron intends to provide the community with milestone updates, such as construction milestones, or notifications regarding construction events or related improvements.

Nation Comment 36:

Given that the 9,000 on-site workers will not all work at the same time, there is no need to have 11,600 parking spaces. Eliminating even 1,600 spaces could reduce the impermeable surfaces on site by 9 to 15 acres, which could have important benefits for wetlands and habitat preservation.

Response: FEIS Appendix B-4 provides the rationale for why 11,600 parking spaces are needed to accommodate the anticipated peak headcount for full-time employees, construction workers, general visitors, visitors to large on-site events, and adequate snow storage capacity. A reduction in the number of parking spaces would not meet the operational needs of the campus.

1.0 Purpose and Need**Purpose and Need Comment 1:**

The DEIS incorrectly relies on the assumption that the Micron project in Clay must independently meet the DRAM production goals set by the U.S. Department of Commerce “necessary to offset potential disruptions to the U.S. economic and national security.” The DEIS does not properly justify the stated production goal, meaning that the public simply has to trust that the Commerce’s assessment is reasonable. Even if we assume that this overall domestic production goal is appropriate, recently announced expansions at other Micron facilities may affect production goals for the Clay facility.

Response: See Response to Nation Comments 6d.

Purpose and Need Comment 2:

General Statements were made that the project is not needed. General concerns were raised that the long-term consequences outweigh the project's benefits.

Response: The lead agencies have determined that there is a need for the Proposed Project. See Response to Nation Comments 6d; FEIS Sections 1.1 and 2.1.1. The Proposed Project is expected to stimulate economic revitalization, specifically in Onondaga County, driven by the creation of high-paying jobs, substantial capital investment, and a measurable increase in regional economic activity. See FEIS Sections 1.1, 2.0.1, and 2.0.2.

Purpose and Need Comment 3:

General comments were raised that the community does not want the project. Micron’s arrival is not what the people want.

Response: The lead agencies recognize that there is opposition to the Proposed Project. All of the concerns that were raised during the comment period have been thoroughly considered, evaluated and addressed in this responsiveness summary.

While certain members of the public expressed their opposition to the Proposed Project, a significant number of commenters expressed support for the Proposed Project. See, e.g., Purpose and Need Comment 7, General Comments 2, 3, 5, 6, 9-13.

Purpose and Need Comment 4:

Commenters expressed concerns that due to changing technologies, the project or the chips that will be manufactured will be obsolete or phased out by the time it is built. The technologies will render the project out of date. Companies that make hardware are not long-lived. Manufacturing will be shipped overseas.

Response: The key role of memory chips and the stated federal policy of supporting domestic semiconductor manufacturing, through the passage of the CHIPS Act, support the feasibility and resiliency of the Micron Project. The Proposed Project will support the production of leading edge dynamic random-access memory (“DRAM”). The Proposed Project is core to the strategic objectives of the CHIPS program and aligns with a key pillar of the Department of Commerce’s “Vision for Success” for CHIPS investments in commercial fabrication facilities, which envisages high-volume domestic DRAM production on economically competitive terms. Although the United States was once a leader in memory production, cost competition and market consolidation led most U.S. companies to exit the memory business in the 1980s and 1990s. Investments in leading-edge memory production in the United States will advance American technology leadership and geographically diversify global supply.

Memory chips are a critical component of all computational systems, ranging from supercomputers to smartphones, and they account for a significant portion of the overall global semiconductor market. DRAM is a type of memory that provides high speed temporary storage that enables fast processing and computation of that data by logic chips. DRAM chips typically constitute approximately 50% of total product costs in high performance computing platforms. Memory comprises approximately one-quarter of semiconductor industry revenue, is growing faster than the overall market, and drives more capital expense investment than any other segment.

Finally, building in the United States affords some benefits to Micron. For example, the United States is cost-competitive in some categories like power, which serves to mitigate partially the cost disadvantage in the United States. Additionally, Micron may experience benefits from being closer geographically to U.S. customers. Such benefits increase the likelihood that Micron will remain committed to the timely completion of the Proposed Project.

Purpose and Need Comment 5:

Commenters expressed concerns that the political climate will change. Others expressed comments regarding political issues or are political in nature and not related to the DEIS.

Response: The comments are outside the scope of required review under NEPA and SEQRA.

Purpose and Need Comment 6:

The DEIS has insufficient justification for why there must be 4 fabs. Commenter suggested an incremental phasing approval process.

Response: As stated in FEIS Sections 1.3 and 2.1, the U.S. Department of Commerce determined that a 4-fab memory campus with an efficient layout at a single location would be required to ensure an economically and commercially viable operation that would meet the Department of Commerce's economic and national security responsibilities under the CHIPS Act. See Response to Nation Comments 6 and 6a; Response to Purpose and Need Comment 2.

Purpose and Need Comment 7:

As global demand for semiconductors grows, the question is no longer if facilities like this will be built, but where. The proposed development carries significant opportunities including well-paying jobs, strengthened national security and long-term economic growth.

Response: Comment noted.

Purpose and Need Comment 8:

The NAACP recognizes the project's stated purpose to revitalize the US semiconductor manufacturing industry, accelerate domestic production of cutting-edge logic and memory chips, and catalyze long-term economically sustainable growth, supporting U.S. economic and national security. The NAACP acknowledges the commitment to attracting new semiconductor manufacturing projects to New York, including through measures like the New York Green CHIPS Program which aims to create thousands of jobs and attached billions of dollars.

Response: Comment noted.

Purpose and Need Comment 9:

Syracuse does not need this big of a facility anywhere near it.

Response: The City of Syracuse is likely to benefit from development of the Proposed Project. Job growth will be enhanced in Central New York, including Syracuse, through the promotion of advanced manufacturing. Similarly, the Central New York Community Engagement Committee (CEC) is investing in regional educational and workforce training programs. Other benefits include, but are not limited to, new household income for thousands of existing residents within the local and regional study areas and substantial new economic activity in the five-county region, facilitating the growth of industries and commercial and residential development. See FEIS Section 3.15.3.2. See also Syracuse Comments 1-3, 13, 14.

Purpose and Need Comment 10:

When its fourth fab is complete, Micron employees in Clay, along with other fabs in the Northeast, will produce one in every four chips made in America. The DEIS notes that the scale of production at all four fabs is crucial to the financial viability of this project and U.S. economic and national security needs.

Response: Comment noted.

Purpose and Need Comment 11:

Upon completion, the Project would be the largest domestic producer of dynamic random-access memory (DRAM) chips, which have crucial applications in military equipment, cybersecurity technology, the aerospace industry, artificial intelligence (AI), and other cutting-edge uses, as well as more common areas of the domestic consumer economy. The EPA recognizes the importance of the Project in supporting the national goal of strengthening domestic supply chains for semiconductors necessary for the national security, manufacturing, critical infrastructure, and technology leadership of the U.S.

Response: Comment noted.

2.0 Project Description and Alternatives**Project Description/Alternatives Comment 1:**

The DEIS is insufficient with respect to analysis and consideration of reduced-scale alternatives or those more protective and consistent with federal and state environmental law and policy.

Response: See Response to Nation Comments 6 and 6a; Responses to Purpose and Need Comments 2 and 6; FEIS Sections 1.1.1 and 2.2.2.

Project Description/Alternatives Comment 2:

General comments were made that the Project should be located elsewhere.

Response: Both OCIDA and New York State have considered the WPCP as an appropriate site for semiconductor manufacturing for decades. As outlined in Section 2.2 of the FEIS, in 1997, New York State initiated the CHIP FAB 98/SEMI-NY Program to promote growth of the State's semiconductor manufacturing industry, which began by identifying suitable sites. By 2000, three sites—Luther Forest (in Malta, NY, in Saratoga County), Marcy Nanocenter (in Marcy, NY, in Oneida County), and WPCP were identified as “shovel ready,” i.e., they had completed certain pre-permitting requirements applicable at that time. In 2017, NYSEDC updated the criteria (evaluation of 108 criteria points) for semiconductor site location, and WPCP was again considered in the top four potentially viable sites, including the Marcy Nanocenter, Western NY Science & Technology & Advanced Manufacturing Park (STAMP), Luther Forest, and WPCP.

Substantial portions of the Marcy Nanocenter, the STAMP site, and the Luther Forest site are developed, and each no longer contains enough undeveloped acres to site the Proposed Project.

In 1991, OCIDA and the City of Syracuse Chamber of Commerce initiated an Industrial Park Feasibility Study to identify potential locations for industrial businesses in Onondaga County. Among the two sites identified, WPCP emerged as the preferred choice due to its proximity to National Grid's Caughdenoy electric substation, excellent highway access, and ability to be rezoned for Industrial use. Onondaga County completed a Generic Environmental Impact Statement (GEIS) that identified and screened various alternatives to WPCP within Onondaga County. The analysis concluded that WPCP was the only viable option to meet the semiconductor industry's needs, as it meets specific project prerequisites, including a large, contiguous parcel of land controlled by a single owner, and access to significant, redundant, and resilient transportation and utility infrastructure. Given the competitiveness and cost sensitivity of the DRAM market, Micron sought to meet its production goals by constructing its fabs and supporting infrastructure on a single site of sufficient size to accommodate all such infrastructure, rather than attempt to develop disparate parcels with duplicative infrastructure and supply chain needs. Therefore, only the WPCP contains the minimum 1,000 acres necessary for the co-location of multiple fabs that can support the extensive infrastructure needs of Micron for economically efficient large-scale semiconductor manufacturing (OCIDA 2013). See also Response to Nation Comment 6d.

Furthermore, the regional area is expected to reap substantial economic benefits if the project is built, as proposed, at the WPCP. See FEIS Section 3.15 and Appx. C-2. As OCIDA determined in its Findings Statement for the SGEIS and restated in the FEIS, high-tech advanced manufacturing holds the promise of transforming the Onondaga County economy through new high-paying jobs, significant financial investment, and increased economic activity, including: (1) the creation of thousands of construction jobs and up to approximately 50,000 permanent jobs; (2) a robust supply chain of companies that will service a high-tech advanced manufacturing organization; (3) a reduction in poverty; and (4) secondary benefits such as increased local small business activity, growth in community civic and cultural organizations, and increased county and municipal investment. This is why Onondaga County and the State of New York have committed to attracting semiconductor manufacturing. See FEIS Sections 1.0.1 and 1.1.

Project Description/Alternatives Comment 3:

The DEIS incorrectly relied upon the alternatives assessed in the 2021 SEQRA Findings Statement for the site.

Response: The FEIS does not rely on the alternatives assessed in the 2021 SEQRA Findings Statement. As required by SEQRA, the FEIS describes and evaluates "the range of reasonable alternatives to the action that are feasible, considering the objectives and capabilities of the project sponsor." 6 NYCRR 617.9(b)(5)(v). This included the No-Action Alternative.

Moreover, because the FEIS was also prepared under NEPA, the FEIS looked at a broader range of alternatives using specific evaluation criteria. See 42 U.S.C. 4332(C)(iii) (requiring the lead agency to consider a "reasonable range of alternatives to the proposed action, including an analysis of any negative environmental impacts of not implementing the proposed action in the case of a no action alternative, that are technically and economically feasible, and meet the purpose and

need of the proposal.”). These alternatives, including the potential for other available sites across the State of New York, a reduced scale project, and alternative configurations, were all evaluated against the detailed evaluation criteria presented in the FEIS. Except for the No Action Alternative, if an alternative would not meet CPO’s purpose and need under NEPA or Micron’s purpose and need under SEQRA (see FEIS Section 1.1) or would not be technically and economically feasible and practicable, CPO and OCIDA determined not to carry that alternative forward for detailed analysis in the FEIS, regardless of how it would compare against the fourth criterion. See FEIS Sections 2.2.2 and 2.2.3; FEIS Appendix B-3 (providing an analysis of the Micron Campus layout alternatives); FEIS Section B-1 (providing Micron Campus selection background).

Thus, while the 2021 Findings Statement was reviewed for consideration of alternatives, it was not dispositive of the issue and a full evaluation of alternatives for the proposed action under SEQRA and NEPA was conducted in the FEIS. See also Responses to Nation Comments 6 and 6a-d; FEIS Appendix B; Responses to NYSDEC Comments 4-5, 8 (noting instances where the Draft Scope was revised to include consideration of various alternatives).

Project Description/Alternatives Comment 4:

The White Pine Commerce Park (WPCP) offers a unique set of infrastructure assets, with requisite power, water and geology. Combined with strategic property acquisition over the past few years, the WPCP is one of a handful of sites in the nation large enough to attract such a semiconductor megaproject, an increasingly important industry for consumers, businesses and U.S. national security. Micron, one of the world's leading computer chip manufacturers, was attracted by the site's amenities, and saw promise in the region's workforce and commitment to further building a skilled talent pipeline.

Response: Comment noted.

Project Description/Alternatives Comment 5:

Comments indicated that the Project should ideally be relocated to avoid destruction of wetlands.

Response: See Responses to Project Description/Alternatives Comments 2 and 3; FEIS Section B-1 (providing Micron Campus selection background). The Preferred Action Alternative site was selected and designed to minimize impacts to wetlands, homes, and other sensitive resources to the greatest extent practicable. The Preferred Action Alternative avoids direct impacts to wetlands to the maximum extent practicable consistent with its purpose and need; however, due to the size and unique infrastructure requirements of a semiconductor manufacturing campus, alternative siting options are extremely limited. As a result, the Preferred Action Alternative site configuration represents the only feasible option to accommodate the Proposed Project while balancing environmental, community, and operational considerations. See also Response to Water Resources Comment 5.

Project Description/Alternatives Comment 6:

Micron should have proposed alternative locations for consideration, with a summary of impacts for each, i.e., why restoration of wetlands would not be as beneficial at an alternative location.

Response: Alternative locations were evaluated in the FEIS, but none could accommodate a campus that met the purpose and need of the Proposed Project. See FEIS Sections 1.0.1, 1.1, and 2.2.

Project Description/Alternatives Comment 7:

A commenter indicated that the US Fish and Wildlife Service criticized Micron for not presenting alternative site plans to better avoid wetlands.

Response: USFWS agreed to act as a participating agency in the preparation of the FEIS based on its special expertise in evaluating effects on aquatic and terrestrial wildlife and their habitats. See FEIS Section 1.2.2.2. Pursuant to the ESA Section 7 consultation process, CPO is consulting with USFWS to ensure that the Proposed Action is not likely to jeopardize the continued existence of any Federally listed threatened or endangered species or destroy or adversely modify designated critical habitat. While USFWS has provided comments and recommendations to the SEQRA Scope of Work and Draft EIS, those comments did not specifically reference the need to provide further alternatives to better avoid wetlands. See Responses to USFWS Comments 1-12; FEIS Appendix B-1 (describing the Micron campus site selection background and providing responses to USFWS Comments 1-5). As discussed in the Response to Project Description/Alternatives Comment 2, the FEIS provides a thorough analysis of alternatives for the proposed action in compliance with the requirements of SEQRA and NEPA.

Project Description/Alternatives Comment 8:

The DEIS fails to provide details with respect to alternative road layouts and design, particularly to avoid wetlands and other impacts.

Response: As discussed in the Response to Project Description/Alternatives Comment 3, the FEIS provides a thorough analysis of alternatives for the proposed action in accordance with the requirements of SEQRA and NEPA. Moreover, the Preferred Action Alternative site was selected and designed to minimize impacts to wetlands, homes, and other sensitive resources to the greatest extent practicable. The Preferred Action Alternative avoids direct impacts to the vast majority of surrounding residential areas; however, due to the size and unique infrastructure requirements of a semiconductor manufacturing campus, alternative siting options are extremely limited. As a result, the Preferred Action Alternative site configuration represents the only feasible option to accommodate the Project while balancing environmental, community, and operational considerations. See Response to Water Resources Comment 5.

With respect to traffic mitigation, the FEIS presents recommended traffic improvements that would mitigate the effects of the Preferred Action Alternative on transportation. Alternative road layouts and final designs would be developed and further evaluated by the NYSDOT and FHWA,

the agencies with direct jurisdiction over the recommended, and any other, traffic improvements. See Response to NYSDOT Comment 2; FEIS Section 3.11.5.

Project Description/Alternatives Comment 9:

There was no alternative to the Project that does not impede attainment of CLCPA emissions goals.

Response: While NEPA and SEQRA require CPO and OCIDA to consider a reasonable range of alternatives to a proposed action, a determination of compliance with the goals of the Climate Leadership and Community Protection Act (CLCPA) is the responsibility of the NYSDEC and other state agencies. As discussed in FEIS Section 3.7.1.3, NYSDEC will review Micron's CLCPA analysis as part of its processing of NYSDEC permits and determine whether the Proposed Project would be inconsistent with or interfere with the attainment of the statewide GHG emission limits in ECL Article 75, and if it determines that it would, whether it is otherwise justified and determine feasible mitigation measures to be required. See Response to Climate Change/GHG Comment 14.

Project Description/Alternatives Comment 10:

The Preferred alternative lacks a comprehensive cost benefit analysis and fails to account for the social cost of GHG emissions.

Response: See Response to Project Description/Alternatives Comment 2 and FEIS Sections 1.0, 1.1, and 2.2, which provide the evaluation criteria under SEQRA/NEPA used by CPO and OCIDA to consider proposed alternatives. The requested cost/benefits analysis is not required by NEPA or SEQRA.

Moreover, although NYSDEC has issued a guidance document, *Establishing a Value of Carbon*, associated with the social cost of carbon, as noted in the guidance, it is not appropriate or useful in all situations. The guidance specifically states that it does not establish a requirement on any public or private entity and is therefore voluntary. Any social cost of carbon analysis or guidance is subject to a host of variables, and any attempt at defining the variables and calculating methods is difficult and can be miscalculated and/or lead to erroneous results. In addition, the NYSDEC social cost of carbon guidance is primarily based on federal guidance, models, and values, which are no longer used by federal agencies. See also Response to Climate Change/GHG Comment 60.

Project Description/Alternatives Comment 11:

The DEIS should be expanded to include a 3-fab alternative. Micron is building and/or expanding its semiconductor operations in other states. This allows for Micron to consider a scaled-down version of its Clay facility. Even a slightly smaller three- fab alternative in Clay might eliminate significant environmental impacts by avoiding wetlands clustered east of Burnett Road, decreasing traffic disruptions, fewer parking spaces, and fewer utility upgrades.

Response: See Response to Project Description/Alternatives Comment 1; Response to Nation Comment 6d; FEIS Section 2.2.2.

Project Description/Alternatives Comment 12:

The project should be constructed in smaller components, with infrastructure that can be adapted for other uses if the building is no longer used. Commenter also suggests using spaces that are already industrial.

Response: The Micron Campus cannot be constructed in smaller components. See Response to Project Description/Alternatives Comment 1. See also Response to Nation Comments 6, 6a, and 6b.

Project Description/Alternatives Comment 13:

The 2-fab alternative option should include analysis of the capacity of other Micron semiconductor facilities expected to be constructed in the future.

Response: See Response to Project Description/Alternatives Comment 1; Response to Nation Comment 6d.

Project Description/Alternatives Comment 14:

A smaller footprint would better fit the objectives of SEQRA, e.g., fewer environmental impacts, project will still produce wafers, and project still feasible with less profits.

Response: See Response to Project Description/Alternatives Comment 1; Response to Nation Comment 6a and 6b.

Project Description/Alternatives Comment 15:

As a global concern, each time the DEIS cites a condition of the project that is expected to have a material environmental impact, it is assumed that there is no feasible alternative, offset, or obligation to maintain a standard of best available technology throughout the project's lifecycle. Is there such an obligation and if not, why not?

Response: The Proposed Project has been designed to avoid or minimize significant adverse impacts where feasible. The FEIS evaluates the reasonably foreseeable environmental impacts of the Proposed Project and Connected Actions and considers mitigation measures that would reduce or avoid otherwise significant impacts as required by NEPA and SEQRA. Although NEPA/SEQRA do not contain a broad “best available technology” standard for project implementation, the FEIS identifies BMPs—many of which are technology-based—that will be required of Micron to minimize environmental impacts, regardless of whether the impacts are anticipated to be significant.

Where significant adverse impacts to a resource area are expected to occur, mitigation measures have been proposed for implementation. However, not all impacts can be mitigated below the level of significance. The impact of the Preferred Action Alternative on some resources will remain significant despite the implementation of BMPs and all available mitigation measures. These unavoidable significant impacts are identified and discussed in FEIS Section 5.1, Unavoidable

Significant Adverse Effects, and are considered unavoidable consequences of selecting the Preferred Action Alternative, regardless of any practicable mitigation measure or BMP.

All BMPs and mitigation measures that are committed to in the FEIS will become obligations of the affected party, though the FEIS cannot bind the actions of other agencies that are not parties to the FEIS.

Project Description/Alternatives Comment 15:

In DEIS Section 0.3, subsection addressing elimination of Rt. 11 Access, commenter agreed that having multiple access points is good for mitigating traffic impacts to the community. In addition, it would provide additional means for egress in emergencies and additional access for emergency vehicles. Commenter stated that employees will like the increased convenience as well.

Response: Comment noted.

3.0 Resources

3.1 Land Use Zoning and Public Policy

Land Use/Zoning Comment 1:

General concerns were raised over the loss of land and greenspace. The area cannot support more people living here without ruining greenspace.

Response: As discussed in FEIS Section 3.1.3.2 and Appendix D-3, the vast majority of the WPCP is zoned Industrial (I-2) and its development is consistent with the local and regional planning policies and fulfills several of the planning policies goals relating to economic development and industrial use of the WPCP. Further, as stated in FEIS Section 3.1.3.2 Preferred Action Alternative, “the growth inducing effects of the Preferred Action Alternative would result in significant changes to land use. However, these changes would continue to be subject to local discretionary approvals and planning policies, including applicable measures to avoid or minimize adverse development effects and preserve community and regional character.” See also Response to Land Use/Zoning Comment 4 and 6.

Land Use/Zoning Comment 2:

Micron is trying to push people out of their homes when they do not want to leave. Why can't they change plans and work around homes and land. The Kings on Caughdenoy Road have been there a long time and are pillars of the community.

Response: OCIDA acquired all the lands at WPCP through negotiated purchase and sale agreements. OCIDA owns all the land at WPCP including the property and residential home at 8700 Caughdenoy Road. The resident of 8700 Caughdenoy Road occupies the home under a license agreement with OCIDA.

The Proposed Project site was selected and designed to minimize impacts to wetlands, homes, and other sensitive resources to the greatest extent practicable. See FEIS Section 2.2, Alternatives. The Proposed Project avoids direct impacts to the vast majority of surrounding residential areas; however, due to the size and unique infrastructure requirements of a semiconductor manufacturing campus, alternative siting options are extremely limited. As a result, the current site configuration represents the only feasible option to accommodate the Proposed Project while balancing environmental, community, and operational considerations. See FEIS Section 2.2.4, Micron Campus Site Layout Alternatives.

Land Use/Zoning Comment 3:

Will more land need to be acquired for the Project?

Response: The Proposed Project is not expected to require additional land. However, certain required mitigation, such as the proposed traffic mitigation, may require acquisition of additional land. FEIS Section 2.1 describes the land necessary for the Proposed Project and Connected Actions.

Land Use/Zoning Comment 4:

In the Land Use Changes subsection, there is reference to two remaining properties that Micron does not have access to, and that OCIDA may need to go through eminent domain to obtain access. Given the time and effort associated with the eminent domain process, the EIS should note this (along with all the other approvals needed) as potential schedule impacts so the public is aware.

Response: The potential use of eminent domain is identified in the FEIS. To the extent that it is required, there would be sufficient time to acquire the parcels so that no schedule impacts are anticipated.

See FEIS Section 3.1.3.2, Preferred Action Alternative, Operational Effects, Land Use Changes. See also Response to Land Use/Zoning Comment 2.

Land Use/Zoning Comment 5:

In DEIS Figure 3.1-4: There is a symbol for Industrial wastewater conveyance (brown line type), but the commenter could not find any such linework in the figure. Please review and adjust if needed. This same comment applies to DEIS Figure 3.1-7 on page 3-16.

Response: Figures 3.1-4 and 3.1-7 have been revised in the FEIS accordingly.

Land Use/Zoning Comment 6:

Concerns were raised regarding the large loss of farmland given its importance to the area in providing food and its economic role in the region. More investment should be made to ensure more farmland is protected in the Central New York Area. It is unclear

whether converting prime agricultural land requires mitigation, like land grants to maintain agricultural property in perpetuity.

Response: See Responses to Oswego Comments 5 and 13. With or without the Proposed Project, the WPCP, which is zoned for industrial use, will be developed by OCIDA in accordance with its 2021 SGEIS, which already considered the effects on land use. Regardless, the WPCP is not currently being used for farmland and there is no expectation that it would ever be used as such.

See FEIS Section 3.1.2.1 and Section 3.1.3.2. Because the Proposed Project and Connected Actions would have limited to no effect on any existing or likely future agricultural uses on the properties where they would be built, farmland conversion under the Preferred Action Alternative would not result in any significant adverse direct effects on agricultural land uses. The growth-inducing effects of the Preferred Action Alternative would result in significant changes to land use. However, these changes would continue to be subject to local discretionary approvals and planning policies, including applicable measures to avoid or minimize adverse development effects and preserve community and regional character. See FEIS Section 3.1.3.2, Preferred Action Alternative, Growth Inducing Effects.

Micron has also complied with existing federal and state regulatory requirements with respect to farmlands. FEIS Section 3.1.1 recognizes the legal and regulatory framework of Farmland Protection Policy Act (FPPA), 7 U.S.C. § 4201 et seq. and New York State Agriculture and Markets Law. Section 3.1.3.2 Preferred Action Alternative discusses Micron's compliance and filing of conversion impact rating forms to NRCS. Appendix D-4 includes copies of the farmland conversion impact rating forms and the NRCS letter.

NRCS conducted a land evaluation and site assessment and determined by letter dated December 5, 2024, that several Proposed Project and Connected Action components would be exempt from FPPA provisions because they would occur in existing urbanized areas, utility corridors, rights-of-way, or already converted areas. Following the NRCS assessment, CPO completed the rating forms, which resulted in scores below 160 for all sites. As a result, the Preferred Action Alternative would not require consideration of alternative sites or project adjustments, and no further action under the FPPA would be necessary.

Land Use/Zoning Comment 7:

General concerns were raised about how proposed land use changes could affect nearby residential agricultural, or public parcels, including those with historic resources.

Response: See Response to Land Use/Zoning Comment 6. FEIS Section 3.5.2.3 outlines the identification of historic properties within the Area of Potential Effect (APE) for the Proposed Project and Connected Actions and presents the results of those investigations as part of the Section 106 process. See Response to Historical/Cultural Resources Comment 1. The APE is the geographic area within which the Proposed Project may directly or indirectly alter the character or use of historic properties. APEs were assessed as part of the Section 106 process. The FEIS acknowledges that induced growth associated with the Proposed Project could potentially affect

historic resources (see FEIS Section 3.5.3, Growth Inducing Effects) and community character (see FEIS Section 3.13.4.2, Growth Inducing Effects) across the broader five-county region. As described in these sections, any future development outside the Study Area is speculative and beyond Micron's control. Such development would be subject to local land use regulations and environmental review under SEQRA, which includes consideration of impacts to historic properties, archaeological resources, and the community. This ensures that protections remain in place even as regional growth evolves independently of the Proposed Project.

Land Use/Zoning Comment 8:

Several commenters advocated for comprehensive planning to ensure the site does not become a brownfield.

Response: See Response to Land Use/Zoning Comment 10, for discussion of consistency with comprehensive planning. See also Responses to Solid Waste and Hazardous Materials Comments 4, 42 and 51.

Micron's implementation of the Proposed Project would be subject to several Federal and State regulatory programs and extensive plans and procedures developed pursuant to those programs (see Response to Solid Waste and Hazardous Materials Comment 4). As part of or in addition to those plans, Micron also would be required to implement several BMPs, as shown in FEIS Table 3.8-13, to address solid and hazardous waste generation and the use of hazardous materials over time and minimize the amount of waste that is generated and requires disposal.

Land Use/Zoning Comment 9:

Concern was raised that improvements by OCDWEP, OCWA, and National Grid could bypass local zoning requirements under the Monroe balancing test or the NYS Public Service Law, reducing community input and local control.

Response: FEIS Section 3.1.3.2, Operational Effects, Zoning Changes, states, "[p]ublic utility projects in New York State are generally exempt from local zoning regulations under a legal doctrine known as the Monroe balancing test, which considers the public interest in such projects. Therefore, the Connected Actions that would be undertaken by OCDWEP and OCWA (see FEIS Table 3.1-1) may be exempt from some or all local zoning requirements. In addition, the Connected Actions that would be undertaken by National Grid may be exempt from local zoning requirements through provisions in the New York State Public Service Law (PSL). To the extent the improvements would be subject to any zoning requirements, OCDWEP, OCWA, and National Grid would apply for any necessary local approvals and would work with the municipalities to ensure the proposed improvements comply with the zoning requirements."

Land Use/Zoning Comment 10:

General concerns were raised that the Project is inconsistent with the Onondaga County Comprehensive Plan or the Town of Clay Northern Land Use Study.

Response: The comment references discrepancies with the Clay Northern Land Use Study (NLUS), which are also documented in the FEIS. See FEIS Appendix D-3, Section D-3.3.1. Although the NLUS was developed before a project of this scale was envisioned, FEIS Section 3.1.3.2 Preferred Action Alternative cites the analysis in Appendix D-3, which evaluates the relationship between the Proposed Project and the Onondaga County Comprehensive Plan, the SMTC 2050 Long Range Transportation Plan 2020 Update, the NLUS, the draft Town of Cicero Comprehensive Plan, and the New York Green CHIPS Program and concludes that the Proposed Project would be consistent with each of these policies and would fulfill several of their goals relating to economic development and industrial use of the WPCP. The Preferred Action Alternative would not result in any significant adverse effects with respect to these policies and would likely result in beneficial effects by fulfilling economic development policy goals. Appendix D further details local and regional plan goals, including those of the Onondaga County Comprehensive Plan and the NLUS.

Land Use/Zoning Comment 11:

Concerns were raised that the Project forecloses future land uses aligned with sustainable development or regenerative ecological restoration, in conflict with the NYS Smart Growth Public Infrastructure Policy Act.

Response: It is expected that induced growth associated with the Proposed Project would be undertaken with climate resiliency in mind, and that the growth would not significantly negatively affect the current climate resiliency of the region. As stated in the FEIS Section 3.7.5, Growth Inducing Effects, “[a]lthough induced growth from the Proposed Project may stress the resiliency of the region to climate impacts, any future development would be conducted under applicable State and local policies and programs, including the Smart Growth Public Infrastructure Policy Act, CLCPA, and CRRA, which establish 11 smart-growth criteria for use by state and local agencies to help ensure that future planning and implementation of transportation, sewer and water treatment, water, education, housing, and publicly supported infrastructure, among other things, is resilient to a changing climate.”

Land Use/Zoning Comment 12:

Suggestion was made that Micron support and fund local municipal training and incentive programs for conservation and mitigation measures, including zoning for conservation housing relying upon native plants building native habitat for bee pollinators, bats, and other displaced species.

Response: The FEIS evaluates and discloses the potential environmental effects of the Proposed Project and Connected Actions and requires training (e.g. fire departments) and conservation and

mitigation measures as described below. Initiatives that are not tied to mitigation for significant adverse effects from the Proposed Project, as suggested by the commentor, are outside the scope of the FEIS for the Proposed Project.

In regard to general conservation and mitigation measures, Micron, in consultation with the USACE, the USFWS, and NYSDEC, considered all protected and non-protected species in the evaluation of onsite impacts and the development of mitigation projects. FEIS Section 3.4, Biological Resources, and Appendix G both discuss upland and wetland communities and species that have been observed and are likely to utilize those communities. The proposed preservation of protected bat and grassland bird species habitat and the proposed wetland mitigation areas will preserve, create and enhance habitat for other non-endangered native plant and animal species that will be impacted by site development.

The mitigation proposed for protected species and wetland habitats also inherently considers protection for protected and non-protected species that currently utilize those site habitats. FEIS Section 3.4.5.1 describes the BMPs the project will implement to minimize impacts to threatened and endangered species. These include, but are not limited to, wintertime tree clearing, tree marking, retention of onsite roosting and foraging habitat where feasible, and limited nighttime construction. As stated in Table 3.4-8, Micron would also implement a Landscape Management Plan to incorporate landscaped areas in the vicinity of new buildings, parking lots, and stormwater management areas with the completion of each fab, and at the Childcare Site. The LMP prioritizes planting and replanting of native species. Micron has also proposed planting native vegetated buffers along the perimeter of the Micron Campus where it is feasible and where allowed under applicable municipal zoning codes, particularly in areas near sensitive habitats, including wetlands, to develop a transition zone between developed and undeveloped habitats. See FEIS Table 3.4-12.

Micron has also developed Mitigation Plans to address the loss of wetlands and surface waters (FEIS Appendix F), as well as the associated biological communities (FEIS Appendix G). The Proposed Project will follow all relevant regulations under the Clean Water Act and Article 24 of the Environmental Conservation Law to address the proposed losses of federal and State jurisdictional wetlands and surface waters. Additionally, all biological resource impacts would be mitigated in accordance with consultation with USFWS and the Endangered Species Act (ESA).

Land Use/Zoning Comment 13:

Concern that the impacts of an estimated 27,000 new households aren't properly considered by the DEIS, and that the assumption that such housing is consistent with the Onondaga County Comprehensive Plan or smart growth is insufficient. DEIS should consider the additional roads, water lines, sewers, and land that will be developed for housing as a result of the Project. The DEIS does not provide a comprehensive study of whether increases in housing developments comply with local and regional comprehensive plans.

Response: See Responses to Land Use/Zoning Comments 10 and 11. As noted throughout the FEIS, the Proposed Project will be constructed over approximately 16 years. In-migration associated with the Proposed Project is anticipated to be spread over the construction period. FEIS Section 3.15.3.2 Environmental Consequences, Preferred Action Alternative, is intended to demonstrate that the Proposed Project will enable growth of populations associated with relatively high paying jobs, using a skilled workforce that will be offered training opportunities to support the available jobs. It is difficult to assess precisely where populations will settle. Several local and regional plans referenced in FEIS Section 3.15.3.2 are already aligned with the potential development of housing, ancillary support businesses, and community services needed for successfully implementing the Proposed Project. In these communities, the desire for industrial manufacturing, such as what Micron would bring to the area, is precisely what has been sought and planned for. Mechanisms have been identified for updating other local comprehensive plans that may not yet fully align with the anticipated growth of the area. Once the Proposed Project is initiated, it is expected that construction of other needed community infrastructure and housing will become incentivized by the influx of revenues generated from the Proposed Project and other project funding.

FEIS Section 3.11, Transportation and Traffic, describes the impacts to transportation facilities based on the vehicles anticipated to travel to and from the site as well as other developments anticipated to be constructed near the proposed site. A summary of the infrastructure expansion required to support the induced growth is discussed in FEIS Section 3.10, Utilities and Supporting Infrastructure. See also Response to Land Use/Zoning Comment 6, for discussion of induced effects to land use.

It is acknowledged in FEIS Section 3.15.3.2, Preferred Action Alternative, Real Property and Housing that the Proposed Project's induced growth would lead to increased housing demand. As the project sponsor, Micron is not required to provide housing, housing strategies, or detailed consideration regarding additional roads, water lines, sewers, etc. that would not be required for the Proposed Project itself to be completed. The location of potential future housing developments is unknown but will be required to comply with federal, state, and local laws, rules and regulations, as well as local and regional planning standards. See also Response to Socioeconomic Comment 19.

Land Use/Zoning Comment 14:

General concerns were raised that growth inducing effects are not properly considered, and that statements that any proposed BMPs and mitigation measures are not required based on future discretionary approvals at the local level are insufficient to demonstrate conformity with local land use planning. There is a lack of clarity surrounding what the expectation is of municipalities to conform to future discretionary land use and zoning actions by Onondaga County.

Response: See Responses to Land Use/Zoning Comments 10 and 12. Land use planning and zoning decisions are the responsibility of local governments, which are carried out through

established discretionary approval processes, including comprehensive plans, zoning codes, subdivision regulations, and site plan review procedures. These processes are designed to ensure that future development is evaluated and approved in accordance with each municipality's adopted policies, regulatory framework, and community priorities. The FEIS identifies potential growth-inducing effects and acknowledges that local governments will continue to guide land use and zoning decisions to address such effects as they arise. See FEIS Section 3.1.3.2, Growth Inducing Effects.

Land Use/Zoning Comment 15:

The DEIS fails to explain how the influx of additional labor force will mitigate the existing housing crisis in lieu of exacerbating it through displacement, etc.

Response: See Response to Socioeconomic Comment 19. As noted throughout the FEIS, the Proposed Project would be constructed over approximately 16 years. The effects of population growth from construction and operation of the Proposed Project over that time on housing demand, property values and housing costs are fully addressed in FEIS Section 3.15.3.2. In-migration associated with the Proposed Project is anticipated to be spread over the construction period. Once the Proposed Project is initiated, it is expected that construction of other needed community infrastructure, and specifically housing, will expand within the pace of in-migration supported by the influx of revenues generated by project workers and other project funding identified to support the community (e.g., the Community Investment Fund).

Land Use/Zoning Comment 16:

The land use impact analysis ignores the fact that the Micron Campus will spur additional commercial and industrial development, which should be addressed.

Response: FEIS Section 3.1.3.2, Growth Inducing Effects, analyzes the effects on land use, zoning and public policy from the induced growth from both the commercial and industrial businesses that will support Micron, in addition to the effects due to the increased demand for housing and business services. The FEIS acknowledges that induced growth will result in noticeable land use changes associated with the new commercial and housing development as well as development supporting Micron's supply chain. The developments will be subject to municipal zoning, and discretionary land use approvals, which would require measures to avoid, minimize or mitigate impacts from the development.

Land Use/Zoning Comment 17:

Widespread land use changes and these impacts on historic resources and local community identity are unaddressed by the DEIS.

Response: The FEIS acknowledges that induced growth associated with the Proposed Project could potentially affect historic resources (see Section 3.5.2.3, Identification of Historic Properties) and community character (see Section 3.13.4.2, Growth Inducing Effects) across the broader five-county region. As described in these sections, any future development outside the

Study Area due to induced growth is speculative at this time. Such development, however, would be subject to local land use regulations and environmental review, which includes consideration of impacts to historic properties, archaeological resources, and the community. This ensures that protections remain in place even as regional growth evolves independently of the Proposed Project. Notwithstanding, land use changes because of the construction and operation of the Proposed Project would be consistent with community character as expressed in local land use regulations, policies and plans.

Land Use/Zoning Comment 18:

Concerns were raised relating to zoning for additional housing required.

Response: See Responses to Land Use/Zoning Comments 15 and 17.

3.2 Geology, Soils and Topography

Geology/Soils Comment 1:

The Micron site is located on an area of geology known as a Karst, and contamination from the Project will be able to move fast and far through this type of aquifer. The DEIS fails to acknowledge the presence of karst-like conditions at the Site and is therefore insufficient to assess the impacts of highly variable subsurface conditions on site preparation and development. Initiation of construction activities such as the excavation and removal of soil or bedrock at the Site is not recommended at this time based on the documented occurrence of soluble bedrock with evidence of dissolution and highly variable subsurface conditions at the Site that could lead to fast, turbulent subsurface water flow and further dissolution of soluble bedrock.

Response: Karst features (e.g., sinkholes, depressions, solution cavities, caves, escarpments, ridges, etc.) were not observed within the WPCP either at the surface or within boreholes performed by Langan (see FEIS Appendix E-4). Previous reporting by CME indicates consistent observations. Similarly, geophysical testing completed within the site, including seismic refraction surveying and MASW testing, did not suggest the presence of karst features. Where tested, recovered bedrock samples were generally reported to show low reactivity to dilute HCl further reducing the potential for development of karst features. Furthermore, the geotechnical investigations of the WPCP did not encounter soils vulnerable to liquefaction, sudden collapse, or failure under seismic loading conditions.

In general, site grading is largely being raised using engineered fill and is not expected to result significant changes to groundwater flow, The native soils will typically remain, and such soils tend to demonstrate low permeability. In addition, the site will largely be built over with impervious cover and engineering controls will be used to manage stormwater and mitigate infiltration during precipitation events.

Impacts on local aquifers resulting from construction are not expected as the vertical extents of excavations tend to be modest and exposure and penetration into the rock mass is limited. Where

the rock mass is exposed, it will be covered or infilled with concrete and engineering controls will be in place during construction to mitigate the potential for impacts.

The Proposed Project will implement a comprehensive suite of BMPs and preventative and responsive measures specifically designed to preclude contamination from project activities with the intent of protecting resources, including groundwater. See FEIS Section 3.2.4, BMPs and Mitigation Measures. As part of the construction design phase, Micron will conduct additional subsurface investigations, including geotechnical borings and groundwater monitoring, to further characterize site conditions. See FEIS Section 3.2.3.2, Construction Effects. These investigations will inform engineering design decisions aimed at mitigating any potential impacts associated with construction and operational activities and identify any karst-like conditions.

These safeguards are applicable throughout all phases of the project, including construction, and are intended to address the potential for rapid groundwater movement associated with karst aquifers. Measures include erosion and sediment control, stormwater management, groundwater monitoring and adaptive management, and hazardous materials handling. See FEIS Section 3.2.4, BMPs and Mitigation Measures. The FEIS also notes that horizontal directional drilling and other low-impact construction techniques will be used to avoid aquifer disturbance.

The table below summarizes these BMPs.

Summary of BMPs for Groundwater Protection

Topic	BMP Description	FEIS Reference
Stormwater Management	Use of stone check dams, slope stabilization, perimeter dikes/swales, rock outlet protection, silt fencing, compost filter socks, sediment traps, stabilized construction accesses. All BMPs follow NYSDEC standards and are documented in stormwater pollution prevention plans (SWPPPs).	Section 3.3.4.2, Stormwater
Adaptive Management	42 groundwater monitoring wells installed; 17 used for adaptive stormwater management. Data from wells and piezometers inform BMP adjustments.	Section 3.3.4.2, Stormwater, Wetland Adaptive Management Plan
Groundwater Recharge Protection	Minimize vegetation removal and soil disturbance; use erosion and sediment control BMPs to maintain infiltration and recharge.	Section 3.3.4.2, Groundwater
Hazardous Materials Handling	Spill prevention and countermeasure plans, secondary containment, release response procedures, on-site emergency response team (ERT), secure chemical storage, automated delivery systems, and leak sensors.	Table 3.14-8, BMPs for Emergency Response; Table 3.8-13, BMPs for Hazardous Waste
Construction Techniques	Use of horizontal directional drilling, timber mats, and other low-impact methods to avoid aquifer disturbance.	Section 3.3.4.2

Cumulative Risk Mitigation	Standardized chemical storage, BMPs to trap or prevent infiltration of contaminated stormwater, and erosion control to reduce cumulative groundwater contamination risks.	Section 4.3, Cumulative Effects
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See also Response to Nation Comment 18.

Geology/Soils Comment 2:

General statements were made relating to the source of fill, its quality, and whether fill material is stable, clean, and suitable for construction. General concerns were also raised about the transport, storage, and placement of the 9 million CY of imported material.

Response: The sourcing and quality of fill material are addressed in FEIS Section 3.2.3.2, Construction Effects, Micron Campus. This section specifies that imported fill material will be obtained from NYSDOT and NYSDEC approved virgin quarry sources. These sources are selected to ensure a known origin and consistent quality of materials used for construction. The FEIS further notes that fill material will be subject to strict placement controls, particularly in areas with sensitive soils, to ensure stability and prevent loss into voids. Additionally, Micron will be required to implement a SWPPP and obtain a SPDES permit for construction activities, which includes sediment and erosion control measures to further protect soil and groundwater quality during fill placement. See FEIS Appendix F-8 for the draft SWPPP.

Geology/Soils Comment 3:

The DEIS indicates that construction of the facility will result in temporary alteration of land type and soil type, but it will permanently change the land type and soil type as all overburden soils are being replaced with aggregate, and the land type will be industrial rather than vacant. The DEIS should be revised accordingly.

Response: FEIS Section 3.2.3.2 acknowledges that construction of the Micron Campus will result in substantial permanent changes to the existing geology, soil conditions, and topography of the WPCP. These changes include the removal of overburden soils, bedrock excavation, pier drilling, and the placement of imported fill material to achieve final site grading. FEIS Section 3.1.3.2 acknowledges that these activities will permanently alter the landform, and the site will transition from its current vacant and limited residential uses to industrial and commercial land use.

Geology/Soils Comment 4:

General statements were made that blasting, grading, or excavation could affect groundwater or mobilize pollutants.

Response: Blasting, if required, will be completed by a licensed blaster in accordance with proper blast design pursuant to the Blasting Plan presented in FEIS Appendix E-5. Grading and excavation activities will likewise adhere to the BMPs identified in FEIS Section 3.2.4, which includes a groundwater monitoring component to confirm that no hydrogeologic changes result

from site construction activities. A Phase I Environmental Site Assessment has been completed for the Proposed Project and a Soils and Materials Management Plan (FEIS Appendix K-7) has been developed to address handling of any contaminated materials encountered during excavation and grading activities and prevent mobilization of any potential contamination.

Geology/Soils Comment 5:

Comments were made about how cutting into glacial tills or bedrock aquifers might change water table levels or cause contamination. Several commenters called for weekly, independent soil testing for toxic chemicals.

Response: The potential for hydrogeologic flow change with the removal of native soils and bedrock exists. However, the geotechnical investigations performed to date suggest that groundwater tends to be perched atop bedrock within the glacial till soils. As the majority of the site work is comprised of filling to raise grades, the proposed construction is not expected to greatly impact local groundwater levels or groundwater flow. Areas of higher existing surface grade are generally limited to areas containing drumlins. Cuts to facilitate construction in these areas will largely reduce mounding of perched water. The coarser grained materials used to replace them for building requirements will be largely covered with impervious structures. Additionally, a groundwater monitoring program will be implemented to verify that excavation and grading activities do not adversely affect local hydrogeology. See also Response to Solid Waste and Hazardous Materials Comment 17; FEIS Section 3.3.3.4, Groundwater.

Geology/Soils Comment 6:

Several comments questioned whether borings and geotechnical tests fully address local soil variability. No borings were conducted east of Burnett Road and should be reflected as such in the site characterization and the DEIS should indicate additional borings will be collected at a later date.

Response: Geotechnical borings have been completed in the areas proposed for the initial phases of construction, including the locations of Fabs 1 and 2, as documented in FEIS Appendix E. These investigations were conducted in Spring and Fall 2023 and Spring 2024, and included test borings, cone penetration testing, test pits, groundwater monitoring wells, and laboratory testing (Appendix E-4).

As noted in FEIS Section 3.2.2.1, bedrock was core-sampled at 13 test boring locations and verified to be sedimentary interbedded shale and dolostone, which is nonreactive to only slightly reactive to dilute hydrochloric acid. Borings were not advanced directly beneath Fab 3 or Fab 4 during the geotechnical investigations included in FEIS Appendix E-4. However, the exploration included multiple locations and is considered representative of site conditions. Further, before construction begins on Fabs 3 and 4, additional borings would be collected. See FEIS Appendix E-4, Geotechnical Reports. This phased approach is consistent with standard engineering practice for large-scale, multi-phase projects and ensures that site-specific soil variability is fully evaluated prior to construction in each area.

The Soil and Materials Management Plan and the SWPPP will also be updated as new data becomes available, ensuring that construction practices remain protective of environmental and structural integrity. See also Response to Geology/Soils Comment 11.

Geology/Soils Comment 7:

In section 3.2.2.1 and Figure 3.2-1, there is a discrepancy or inconsistency in the references to glacial till depth and description of the shallowness of bedrock.

Response: No discrepancy regarding bedrock depths in the Micron Campus and Rail Spur Site locations are noted. The referenced Section and Figure correlate properly.

Geology/Soils Comment 8:

The commenter warned that 2012 study suggests biogeochemical function is not fully restored based on soil carbon storage where wetlands are restored or created and requested additional documentation to support Micron's statements that BMPs/SMPs will mitigate temporary soil erosion.

Response: While full restoration of soil carbon storage may not be immediate, the mitigation plan integrates BMPs/SMPs and ecological design principles to promote long-term recovery of biogeochemical functions. See FEIS Section 3.2.4, BMPs and Mitigation Measures. The Proposed Project's phased implementation, monitoring, and adaptive management framework provide a robust response to the concerns raised in the 2012 study and ensures compliance with regulatory requirements.

Specifically, Micron's migration strategy below, which incorporates both scientific understanding of soil recovery and regulatory best practices, is designed to address these challenges.

1. Soil Function and Restoration Limitations

The Oneida River mitigation site has a documented history of agricultural use and logging, resulting in compacted soils, altered hydrology, and degraded biogeochemical conditions. The plan recognizes that soil carbon dynamics and microbial functions may take years to reestablish. See FEIS Appendix F-7-7. However, the restoration design intentionally incorporates features that promote soil recovery, including:

- Microtopography restoration (e.g., pit-and-mound structures) to enhance water retention and organic matter accumulation.
- Use of native hydrophytic vegetation with deep and diverse root systems to support microbial activity and carbon sequestration.
- Uncompacted soil placement to allow natural settling and aeration.

2. Erosion Control and BMPs/SMPs

To mitigate temporary soil erosion during construction and early establishment phases, the project includes a comprehensive suite of BMPs and SMPs that are outlined in the draft SWPPP for Phase 1a of the Micron Campus (See FEIS Appendix F-8). These include:

- Pre-construction erosion controls, such as silt fencing and marked disturbance boundaries.
- Spoil deposition protocols to prevent sediment transport into wetlands and waterways.
- Post-construction stabilization, including mulching, seeding, and planting with erosion-resistant native species.
- Monitoring and maintenance of erosion control structures for up to three growing seasons or until full stabilization is achieved.

3. Long-Term Monitoring and Adaptive Management

The mitigation plan includes a 15-year monitoring program with performance standards for hydrology, vegetation, and invasive species control. See FEIS Section 3.4.5.2 and Appendix F-7-(3-8). Soil development and vegetative cover will be tracked annually, and adaptive management measures—such as regrading, replanting, or hydrologic adjustments—will be implemented if performance goals are not met.

Geology/Soils Comment 9:

A comment noted that stumps and root wads are generally not available from typical commercial logging based on soil disturbance, and thus those made available from tree clearing and grubbing operations should be utilized.

Response: Micron and The Wetland Trust are actively working with the USACE and NYSDEC to evaluate the feasibility of using the cleared and grubbed woody debris from the Micron Campus, including for use in the wetland mitigation sites, while adhering to the provision set forth in the Invasive Species Management Plan (FEIS Appendix G-9) and the Soil and Materials Management Plan (see FEIS Section 3.8, Solid Waste, Hazardous Waste and Hazardous Materials and Appendix K-7). Ultimately, the determination on reuse of this material will be up to the permitting agencies.

Geology/Soils Comment 10:

Comments sought clarification whether Micron would participate in the NYS Beneficial Use Program (BUD) with respect to reuse of excavated material. It is optimistic to assume all soils will be recyclable. Uncontaminated excavated soil ineligible for beneficial use could be used as landfill cover at solid waste facilities. A commenter recommended backup for the estimated quantities of eligible soils be provided in the Appendix.

Response: Micron intends to participate in the NYSDEC BUD program for the reuse of excavated materials, as described in FEIS Section 3.8.3.2. The FEIS specifies that excavated materials will be evaluated for BUD eligibility and, where appropriate, reused or recycled in accordance with NYSDEC regulations. This includes potential reuse as structural fill, road base, or other engineered applications.

Not all excavated soils will be suitable for reuse under the BUD program. Soils that are uncontaminated but ineligible for beneficial use may be directed to solid waste facilities for use as landfill cover, consistent with NYSDEC guidance and waste management protocols.

To support this approach, FEIS Appendix E provides extensive geotechnical data characterizing the physical properties of native and excavated soils, including:

- Grain size distribution and Atterberg limits for classification.
- Moisture-density relationships and California Bearing Ratio (CBR) testing for compaction and load-bearing suitability.
- Visual soil classifications from over 200 test borings and 17 test pits, which inform estimates of material reuse potential.

These data form the basis for estimating the quantities of excavated soils likely to meet BUD criteria, and for identifying materials suitable for alternative uses such as landfill cover. While exact quantities are subject to refinement during construction, the FEIS and Appendix E provide a robust framework for evaluating and managing excavated materials in compliance with state regulations.

Geology/Soils Comment 11:

The project is being built on a wetland and an area of a high water table, which means the possibility of soil liquefaction exists. The soil may not support the weight of the fabs.

Response: See Responses to Geology/Soils Comments 1, 2, and 6. As noted in FEIS Section 3.2.2.1, there is generally a low risk of geologic hazards within the study area. A comprehensive geotechnical investigation was conducted for the Proposed Project, with full results presented in FEIS Appendix E-4 and summarized in FEIS Section 3.2.3.2. These investigations included over 200 test borings, laboratory testing, infiltration studies, and installation of groundwater monitoring wells to characterize subsurface conditions across the site.

The Proposed Project site is located in an area with wetlands and a high-water table, and the FEIS acknowledges these conditions (see Appendix E-4 Geotechnical Reports). However, the geotechnical data does not indicate a significant risk of soil liquefaction. Laboratory testing—including one-dimensional consolidation tests, moisture-density relationships, and California Bearing Ratio (CBR) evaluations—demonstrate that the native soils exhibit sufficient strength and stability under anticipated loading conditions. For example, and as discussed:

- Dry unit weights ranged from 107 to 112 per cubic foot (pcf), with low void ratios and moderate compression indices.
- Soils were classified primarily as grey silts with little clay and trace sand, which are not typically prone to liquefaction.
- Coefficients of consolidation were high, indicating rapid dissipation of pore pressures under load.

Bedrock was core-sampled at 13 test boring locations and verified to be sedimentary interbedded shale and dolostone, which is nonreactive to only slightly reactive to dilute hydrochloric acid. Karst topography (known for higher incidences of sinkholes) was not noted at the site. While borings were not advanced directly beneath Fab 3 or Fab 4 during the geotechnical investigations included in FEIS Appendix E-4, the exploration included multiple locations and is considered representative of site conditions. Steep slope and soil conditions at greater risk of landslides also were not identified at the WPCP. Furthermore, the geotechnical investigations of the WPCP did not encounter soils vulnerable to liquefaction, sudden collapse, or failure under seismic loading conditions.

Additionally, it should be noted, the 2019 Onondaga County Multi-Jurisdictional Hazard Mitigation Plan Update, the Towns of Clay and Cicero are located in areas with moderate susceptibility to landsliding but a low incidence of occurrence; only one small area in the center of the southern portion of Onondaga County has a moderate incidence of landslide occurrence.

Furthermore, Micron's design drawings will specify the use of structural fill materials that meet NYSDOT standards. See FEIS Section 3.2.3.2, Preferred Action Alternative. These materials will be placed and compacted in engineered lifts, and their use will be subject to review and approval during the building permit process. The FEIS also notes that ground improvement techniques may be employed where necessary to ensure long-term stability.

Geology/Soils Comment 12:

Comments sought clarification of soil stability and permeability, and associated flood risks from extreme weather events.

As discussed in the FEIS Section 3.2.2.1 and Appendix E, soil conditions at the WPCP are stable and not vulnerable to seismic or collapse-related risks. The mitigation design incorporates site-specific soil permeability characteristics and includes comprehensive flood resilience measures. These strategies collectively ensure that the project can withstand extreme weather events while maintaining ecological and structural integrity. Specifically:

1. Soil Stability and Seismic Risk

As stated in the FEIS (Section 3.2.2.1 Geology): "The geotechnical investigations of the WPCP conducted in 2023 did not encounter soils vulnerable to liquefaction, sudden collapse, or failure under seismic loading conditions, based on a computational analysis using CME's Subsurface Exploration data, which included Standard Penetration Testing (SPT), Cone Penetration Testing (CPT), and Multichannel Analysis of Surface Waves (MASW). No sinkholes were identified on the WPCP."

This confirms that the soils underlying the Project site and associated infrastructure are structurally stable and not prone to collapse or seismic failure. These findings are based on industry-standard geotechnical methods and provide assurance that the site is not at risk of subsurface instability.

2. Soil Permeability and Hydrologic Management

FEIS Appendix F-7-(3-8) (Section 3.2 and 3.3 of the Wetland Mitigation Plans) provides detailed soil mapping and hydrologic assessments across the mitigation sites. Key findings include:

- The Oneida River site is dominated by high clay-content soils, which naturally retain water and slow infiltration (Appendix F-7-7, Table 3-1).
- Aquitard-like layers were identified in some areas, further limiting permeability and enhancing surface saturation (Appendix F-7-(3-8), Section 3.3).
- These characteristics are accounted for in the wetland design through:
 - Grading and microtopography restoration to manage water retention and flow (Appendix F-7-(3-8), Section 5.2).
 - Disabling of drainage tiles and construction of berms to restore natural hydrology (Appendix F-7-(3-8), Figures 5-2 and 5-3).
 - Installation of monitoring wells and staff gauges to track groundwater and surface water dynamics (Appendix F-7-(3-8), Table 3-3 and Figure 3-5).

3. Flood Risk and Climate Resilience

FEIS Appendix F-7-(3-8) (Section 10) outlines adaptive management strategies to address flood risks and extreme weather events:

- Sediment and erosion control measures are implemented before, during, and after construction, including silt fencing, spoil deposition protocols, and stabilization practices (Appendix F-7-(3-8), Section 5.6).
- Stormwater Best Management Practices (BMPs) and Site Management Practices (SMPs) are incorporated to handle varying infiltration rates and runoff volumes and are detailed in the draft SWPPP for Phase 1a of the Micron Campus (See FEIS Appendix F-8).
- The plan includes contingency measures for flooding events, such as replanting, soil stabilization, and reconstruction of berms or ditch plugs if damaged (Appendix F-7-(3-8), Section 10).

Geology/Soils Comment 13:

Comments sought clarification as to a preliminary estimate of soil to be reused onsite and whether excavated wetland soils could be used in wetland restoration. A commenter suggested coordination with wetlands experts to determine whether soil and muck removed from existing wetlands could be utilized as part of the wetlands mitigation plan.

Response: FEIS Section 3.8.3.2 contemplates the use of excavated materials, including re-use and recycling. See Response to Geology/Soils Comment 9 and Water Resources Comment 13.

Geology/Soils Comment 14:

Comments sought clarification of basis for bedrock removal for underground utilities and whether shallow groundwater is an anticipated construction concern.

Response: Underground utilities will need to maintain specific burial depths from source area to end-use location connections. On the Proposed Project site, bedrock removal for building foundations will be required to attain design construction depths; however, onsite utilities will primarily be located within areas of fill. Industry-standard best management practices (BMPs) will be observed during all construction phases to address any encountered groundwater. These BMPs—including dewatering plans, SWPPP, spill prevention and control plans (SPCC/SPR), and soil stabilization techniques—are outlined in FEIS Section 3.2.4, BMPs and Mitigation Measures. These practices are designed to prevent contamination, promote groundwater recharge, and ensure immediate containment and cleanup of any accidental releases during construction.

Geology/Soils Comment 15:

General statements were made indicating that soil types must be assessed to consider negative impacts of habitat loss.

Response: The FEIS provides a robust foundation for understanding the implications of soil disturbance on habitat integrity and supports the development of appropriate mitigation measures. As discussed in FEIS Section 3.2.4, BMPs and Mitigation Measures, soil types were evaluated in order to inform environmental mitigation strategies and construction planning. The geotechnical data in FEIS Appendix E supports the identification of soil characteristics that influence erosion potential, foundation stability, and suitability for vegetation and habitat restoration. More specifically, Appendix E includes the geology, soils, and topography methodology; a list of soil type descriptions; and geotechnical reports prepared for the Proposed Project. Habitat loss is discussed in Section 3.4.3.1, Ecological Communities and Section 3.1.2.3, Protected Farmland discusses the potential impacts of the conversion of prime farmland soils, which can also be associated with habitat loss. See also Response to Geology/Soils Comment 4.

Geology/Soils Comment 16:

A commenter sought clarification of measures to eliminate acid runoff reaching limestone and causing degradation.

Response: Site-specific stormwater modeling and design will be conducted during the permitting phase. Stormwater design and permitting will follow current NYSDEC requirements at the time of permit submittal for each phase of the project. Stormwater Management Practices (SMPs) will be implemented to preserve existing drainage patterns to the greatest extent practicable, maintain conveyance of upland watershed runoff, control increases in stormwater volume, prevent soil erosion and sedimentation, and reduce runoff through the use of green infrastructure where feasible. These measures are outlined in FEIS Section 3.3.4.2, Table 3.3-11 and Appendix F and collectively mitigate downstream flood risks, protect water quality, and prevent chemical interactions that could degrade limestone or other vulnerable substrates.

Geology/Soils Comment 17:

Karst topography and steep slope and soil conditions of the Proposed Project and Connected Action sites provide a greater risk of landslides and sinkholes.

Response: See Response to Geology/Soils Comment 1. Potential geologic hazards are addressed in FEIS Section 3.2.2.1, Geology, which concludes that “[t]here is generally a low risk of geologic hazards within the study area.” The geotechnical investigations conducted in 2023 at the White Pine Commerce Park (WPCP) included Standard Penetration Testing (SPT), Cone Penetration Testing (CPT), and Multichannel Analysis of Surface Waves (MASW). The potential for geologic hazards is considered low with the area experiencing reasonably low seismicity. These investigations found no evidence of soils vulnerable to liquefaction, sudden collapse, or failure under seismic loading conditions, as the site soils are not considered to be prone to liquefaction, landslides, or lateral spreading impacts.

Further, karst topography, which is typically associated with increased risk of sinkholes due to the presence of soluble rock such as limestone, was not noted at the Proposed Project site. FEIS Section 3.2.2.1, Geology.

Additionally, steep slope and soil conditions that could elevate the risk of landslides were not identified at the Micron Campus. According to the 2019 Onondaga County Multi-Jurisdictional Hazard Mitigation Plan Update, the Towns of Clay and Cicero are located in areas with moderate susceptibility but low incidence of landsliding; only a small area in the southern portion of Onondaga County shows moderate incidence of landslide occurrence. See FEIS Section 3.2.2.1, Geology.

As discussed in the FEIS, geologic conditions at the proposed Rail Spur and Childcare Sites, as well as existing utility properties, are substantially similar to those at the Micron Campus. Therefore, the risk of seismic activity, sinkholes, and landslides at these locations is also considered low. See FEIS Section 3.2.2.1, Geology.

Notwithstanding, as part of the construction design phase, Micron will conduct additional subsurface investigations, including geotechnical borings and groundwater monitoring, to further characterize site conditions. These investigations will inform engineering design decisions aimed to mitigate any potential impacts associated with construction and operation activities and identify any karst-like conditions. See also Response to Geology/Soils Comments 1 and 6.

Geology/Soils Comment 18:

A commenter raised concerns that not all bedrock intended to be built upon was evaluated.

Response: See Response to Geology/Soils Comment 6.

Geology/Soils Comment 19:

Surface and subsurface conditions which are consistent with karst geology/features and can pose significant risks to human health, built structures, water quality, and the environment through the formation of unwanted and damaging land subsidence, flooding, slope movements, and/or contaminant migration.

Response: See Response to Geology/Soils Comment 1 and 17.

Geology/Soils Comment 20:

Review of the DEIS uncovered significant data and information gaps regarding the Site's geology, soils, topography, and water resources, including but not limited to recent nearby use of a productive bedrock aquifer for local water supply. Additional investigation and characterization of the Site's geology, hydrology, and local groundwater use are required to inform the public and to assist owners, operators, design professionals, plan reviewers, public works officials, and jurisdictional regulators in making informed decisions on Site development and management.

Response: See Responses to Geology/Soils Comments 1 and 12.

Geology/Soils Comment 21:

The 10-foot contour interval used in topographic maps presented in Section 3.2 of the Draft EIS is inadequate to identify topographic features with less than 10 feet of relief. Field experience has shown that many topographic features associated with the dissolution of soluble bedrock (i.e., karst) in central New York have less than 10 feet of topographic relief. Karst is a landscape formed by the dissolution of soluble bedrock and is characterized by a variety of distinctive features including solution-enlarged fractures, rock pinnacles, closed topographic depressions, sinking streams, and others, and also by the dominance of subsurface drainage over surface drainage. The use of smaller topographic contour intervals (e.g., a 2-foot contour interval) in mapping is better suited for assessments of potential karst areas in central New York, particularly in relatively flat areas.

Response: While the topographic maps presented in FEIS Section 3.2 utilize 10-foot contour intervals, more detailed topographic conditions were collected by the surveyor, which documented the topography at 1-foot contour intervals. The 1-foot contour interval survey is referenced in the Geotechnical Report included in FEIS Appendix E-4. See also Responses to Geology/Soils Comments 1 and 17.

Geology/Soils Comment 22:

Review of Figures E-2 and E-3 of the EIS show areas of steeper slopes at the Site. Close examination of these two figures show numerous locations with generally circular or elliptical areas of connected (closed) steeper slopes. Some (possibly many) of these areas

likely represent closed circular or elliptical topographic depressions, which are a common, distinctive landform that occurs in areas of karst geology and hydrology.

Response: While Figures E-2 and E-3 do show localized slope variations, this does not necessarily indicate karst conditions. Potential geologic hazards are addressed in FEIS Section 3.2.2.1 Geology, which concludes that “[t]here is generally a low risk of geologic hazards within the study area.” Further, the topography of the Proposed Project site is generally flat to gently sloping, and the circular or elliptical slope features observed in the figures could also reflect natural surface depressions or historic land use patterns, rather than active karst processes. See FEIS Section 3.2.2.3, Topography and Table 3.2-3. Karst topography (known for higher incidences of sinkholes) was not noted at the Proposed Project site. Regardless, as part of the construction design phase, Micron will conduct additional subsurface investigations, including geotechnical borings and groundwater monitoring, to further characterize site conditions. These investigations will inform engineering design decisions aimed at mitigating any potential impacts associated with construction and operational activities and identify any karst-like conditions. See also Responses to Geology/Soils Comments 1 and 17.

Geology/Soils Comment 23:

Topographic contours in the vicinity of the proposed Micron Campus and surrounding areas published by the New York State Department of Transportation shows many water-filled closed topographic depressions on and near the proposed Micron Campus, which are a common landform that occurs in areas of karst geology and hydrology.

Response: See Responses to Geology/Soils Comments 1, 17, and 22.

Geology/Soils Comment 24:

Review of the Onondaga County Multi-Jurisdiction Hazardous Mitigation Plan Update indicates that the proposed Micron Campus and Rail Spur are located fully within a geological hazard area consisting of dolostone bedrock which is a soluble carbonate rock that is susceptible to dissolution and the resulting formation of karst features such as solution-enlarged fractures and sinkholes, and the associated hazards of land subsidence, floods, and slope movements.

Response: Potential geologic hazards and geotechnical considerations are discussed in FEIS Section 3.2.2.1, Geology, finding that “[t]here is generally a low risk of geologic hazards within the study area.” The FEIS states further, “The geotechnical investigations of the WPCP conducted in 2023 did not encounter soils vulnerable to liquefaction, sudden collapse, or failure under seismic loading conditions, based on a computational analysis using CME’s Subsurface Exploration data, which included Standard Penetration Testing (SPT), Cone Penetration Testing (CPT), and Multichannel Analysis of Surface Waves (MASW). No sinkholes were identified on the WPCP.” Karst topography was not noted at the Proposed Project site. See also Response to Geology/Soils Comments 1, 17, and 22.

Geology/Soils Comment 25:

Micron is proposing to remove a very large volume of relatively impermeable soil and replace it with more permeable fill materials, which will increase infiltration into the subsurface and likely exacerbate the dissolution of soluble bedrock and the formation and development of karst features. Removal of significant amounts of soil or other cover over karst features may also accelerate or trigger the development of sinkholes or other karst features through a variety of processes.

Response: FEIS Section 3.2.3.2 identifies the quantities of soil and bedrock removal required for site preparation. It further explains that excavated soils deemed unsuitable for structural use will be reused elsewhere on the property where appropriate, helping to minimize off-site disposal and maintain site stability.

Imported coarser materials will be used primarily in foundation zones and beneath paved surfaces, such as roads and parking areas, where structural support and drainage performance are critical. These areas will be covered by impermeable surfaces—including buildings, concrete pads, and asphalt—which significantly reduce direct groundwater infiltration into the subsurface.

It should also be noted that as part of the construction design phase, Micron will conduct additional subsurface investigations, including geotechnical borings and groundwater monitoring, to further characterize site conditions. These investigations will inform engineering design decisions aimed at mitigating any potential impacts associated with construction and operational activities and will identify any karst-like conditions. See also Responses to Geology/Soils Comments 1, 2, and 24.

Geology/Soils Comment 26:

The Micron campus is located on Lockport Group bedrock formation which are susceptible to formation of karst features. Development of some karst features including sinkholes have been documented on the Lockport Group.

Response: See Response to Geology/Soils Comment 1.

Geology/Soils Comment 27:

Another bedrock formation nearby is the Camillus Shale, which has been reported that small solutional conduits drained into these mines and some land-surface subsidence has occurred.

Response: See Response to Geology/Soils Comment 1.

Geology/Soils Comment 28:

Another bedrock formation in the vicinity of the site and the connected actions known as the Vernon Formation, is identified in the list of karst aquifers published by the USGS.

Response: See Response to Geology/Soils Comment 1.

The Vernon Formation is present beneath some of the Connected Action sites, but it does not underlie the Micron Campus. In the areas where it is present, the Vernon rock unit consists primarily of shale, which is a non-carbonate sedimentary rock. Unlike carbonate rocks such as limestone or dolostone, shale is not highly susceptible to dissolution. See FEIS Section 3.2.2.1, Geology.

Geology/Soils Comment 29:

The DEIS indicates bedrock is encountered at shallow depths, which is very close to bedrock encountered at greater depths. Variable depth to bedrock is a common condition in areas of karst geology and may indicate a zone of epikarst, which typically contains significant amounts of stored water.

Response: See Response to Geology/Soils Comment 1.

Geology/Soils Comment 30:

Appendix E-4 of the EIS contains photos and boring data, further evidencing features associated with dissolution of soluble bedrock.

Response: See Response to Geology/Soils Comment 1.

Geology/Soils Comment 31:

The commenter indicates that the statement in Section 3.2.2.1 of the Draft EIS that karst topography was not noted at the Site does not eliminate the presence of karst conditions at, beneath, or near the proposed limits of disturbance at the Site.

Response: See Response to Geology/Soils Comment 1.

Geology/Soils Comment 32:

The structural attitude of Site bedrock likely consists predominantly of sub-horizontal bedding that strikes generally east-west and dips gently towards the south. Several sets of regional joints or fractures occur in area bedrock with predominant structural trends striking generally northwest and generally east-northeast. These regional joint and fracture sets commonly act as preferential pathways for water migration and the development of solution-enlarged joints and fractures in soluble carbonate or evaporite bedrock formations, such as those that occur at and near the Site.

Response: See Response to Geology/Soils Comment 1.

Geology/Soils Comment 33:

The Site's physical setting, geology, and hydrology indicate the proposed Micron Campus and Rail Spur Site are located directly over a productive soluble bedrock aquifer with features consistent with a karst aquifer. This aquifer is likely used by some property

owners in the area for water supply, and these are highly susceptible to contamination, moving long distances, quickly without attenuation.

Response: See Response to Geology/Soils Comment 1. The comment presumes sources of contamination, which are precluded by excavation and operational BMPs and prevention and response measures detailed throughout the FEIS. See FEIS Section 3.3.5, BMPs and Mitigation Measures.

Geology/Soils Comment 34:

The DEIS does not include groundwater contour maps, groundwater potentiometric maps, geologic cross sections, bedrock surface contour maps, or similar maps and data for overburden groundwater and bedrock groundwater.

Response: See Response to Water Resources Comment 76. Bedrock depths are shown in FEIS Figure 3.2-1. Figure 3.2-1 has been updated to include additional boring locations.

Geology/Soils Comment 35:

A commenter suggests performing a surface geophysical investigation using one or more methods discussed in ASTM (2020) tailored for subsurface fracture detection and void or sinkhole detection and installing monitoring wells at coupled overburden and bedrock monitoring wells.

Response: The geotechnical investigation methods and results, including geophysical surveys, are detailed in FEIS Appendix E. These investigations included Standard Penetration Testing (SPT), Cone Penetration Testing (CPT), and Multichannel Analysis of Surface Waves (MASW), which are consistent with industry standards and appropriate for evaluating subsurface conditions.

3.3 Water Resources

Water Resources Comment 1:

A commenter stated that it is unclear from the discussion in the DEIS whether the identification and delineation of wetlands, and the mitigation on which it is based, accounts for and complies with the 2022 amendments to the New York State Wetlands Law and its implementing regulations that went into effect on January 1, 2025, because some of the delineation happened before the freshwater wetlands legislative amendments were enacted and all of the delineations and site visits happened before the language of the final regulations and the revised wetlands classification system was made public in December of 2024.

Response: All wetlands within the Proposed Project area were identified and delineated by Micron's consultant based on technical criteria (soils, plants, and hydrology as described in the Updated Wetlands Delineation Report, Appendix H of the Joint Permit Application) and were reviewed after the passage of the 2022 amendments to the New York State Wetlands Law or are under review by NYSDEC now. See also FEIS Appendix F. As discussed in FEIS Section 3.3.3.1

and Appendix F-3.1, Micron’s consultant delineated all wetlands within the boundaries of the Micron Campus, Rail Spur Site, and Childcare Site. NYSDEC evaluated the delineations and issued a Jurisdictional Determination (JD) for the Micron Campus in February 2024 based on connections to existing jurisdictional Class II and Class III wetlands, and, after the 2022 amendments, including the criteria for wetlands of unusual importance, were enacted. No state wetlands were identified at the Rail Spur Site, and a JD is still pending for the Childcare Site where wetlands are being avoided. The delineations also included wetlands that were evaluated and ultimately determined by NYSDEC (and USACE) not to be jurisdictional. A listing of the JDs prepared for the Micron Campus, the Rail Spur Site, and the Childcare Site can be found in Appendix F-6. Copies of the individual JD letters can be found in Appendix H of the 404 Permit Application.

NYSDEC will apply the current standards set forth in the NYS Wetlands Law (Environmental Conservation Law Article 24) and its implementing regulations at 6 NYCRR § 664 when evaluating Micron’s pending state wetlands permit application, and, if a permit is issued, will enforce its terms. NYSDEC is also an involved agency in the SEQRA process, provided input on the development of the DEIS, and made numerous field visits to confirm Micron’s wetland delineation. Any other jurisdictional determination after January 2025, for example, for the Connected Actions, will be in accordance with the new state wetlands regulations.

Water Resources Comment 2:

A commenter stated that all wetlands should be analyzed and wetlands larger than 7.4 acres should be considered state jurisdictional and come with commensurate buffers, protections and mitigations associated with their permitting because construction will continue to occur when the jurisdictional threshold is reduced to 7.4 acres.

Response: See Response to Water Resources Comment 1. All wetlands within the Proposed Project area were identified and delineated by Micron’s consultants and reviewed by NYSDEC in accordance with current regulations. NYSDEC is reviewing Micron’s wetland permit application, which covers construction of the entire Proposed Project, under current NYSDEC regulations, and utilizing the delineated federal and state wetlands identified in FEIS Appendix F. The NYSDEC regulations that will expand NYSDEC jurisdiction to all wetlands of at least 7.4 acres will not take effect until January 1, 2028, and will not apply to Micron’s wetland permitting process, which will be completed before that time.

Water Resources Comment 3:

Commenters stated that wetlands should be evaluated for jurisdictional criteria for “local importance.”

Response: See Responses to Water Resources Comments 1 and 2.

Water Resources Comment 4:

A commenter stated that the DEIS does not assess wetland impacts from traffic improvements, including the new 481 interchange at the CSX crossing.

Response: The NYS Route 31/NYS Route 481 Interchange is a separate planned infrastructure project and is not part of the Proposed Project. Therefore, potential impacts—such as those to wetlands—associated with that interchange will be evaluated through a separate environmental review and permitting process specific to that project.

Water Resources Comment 5:

Commenters stated that the Micron Campus should be designed to protect wetlands and incorporate onsite mitigation wetlands.

Response: The Proposed Project was designed to avoid and minimize impacts to wetlands to the greatest extent practicable while maintaining an operable design for manufacturing operations. Overall, the Proposed Project layout will avoid disturbances to 33.35 acres of federal jurisdictional wetlands and 33.37 acres of state jurisdictional wetlands in W34, and 157.36 acres of federal and state jurisdictional wetlands in W35. The Proposed Project also avoids 8.36 acres of jurisdictional wetlands on the Rail Spur Site and all jurisdictional wetlands on the Childcare Site. See FEIS Section 3.3.4.2, Construction Effects, Wetlands. Mitigation requirements necessitate a suitable large area for offsite mitigation to create continuous wetlands that will replace lost wetland services, which cannot be accomplished on the Micron Campus. See also Response to Water Resources Comment 6.

As part of its application for a Clean Water Act (CWA) Section 404 dredge and fill permit from U.S. Army Corps of Engineers (USACE), and a Freshwater Wetlands Permit (ECL Article 24, Title 7) from the New York State Department of Environmental Conservation (NYSDEC), Micron has proposed a compensatory mitigation plan to offset losses of wetlands. The permitting process with USACE and NYSDEC, including the development of appropriate mitigation measures, is ongoing. Mitigation for the other Connected Actions is also under development and remains the responsibility of each respective Connected Action proponent. As described in FEIS Sections 3.3.5 and 3.4.5, Micron would also implement a range of best management practices (BMPs) to avoid and, where impacts are unavoidable, reduce indirect adverse impacts from construction and operation of the Proposed Project. BMPs include stormwater controls to prevent runoff pollution and promote infiltration, and measures to manage lighting, noise, and other disturbances that could affect wetland functions and wildlife.

Water Resources Comment 6:

A commenter stated that the DEIS should provide the basis for the selection of the wetland mitigation sites. The suitability of the wetland mitigation sites, including the degree of connectedness between the sites, distance from the Micron Campus and the potential for residual pesticides and herbicides in soils from use as croplands, was questioned. Commenters noted the land was previously used for soybean production that could have resulted in herbicide/pesticide contamination.

Response: Mitigation site selection is a complex process that considers proximity to project, availability, suitability, and size, depending on the mitigation required and species need. Selection of the mitigation sites was subject to extensive due diligence and regulatory review and scrutiny by the USACE. Environmental due diligence and historical investigations of each of the mitigation

sites was performed as required by the 2008 Compensatory Mitigation Rule that governs compensatory mitigation requirements for unavoidable impacts and requires that certain site selection criteria be met. See FEIS Appendix F-7, Appendix N, Section 3, Mitigation Site Selection Process.

The mitigation sites were selected, in part, based upon proximity to the unavoidable impacts. Two of the proposed mitigation sites are located within the same HUC-12 watershed as the Proposed Project, and the remaining four are located within the same HUC-10 watershed. The largest possible sites that meet the criteria were considered as part of the U.S. Army Corps of Engineers and NYS Department of Environmental Conservation permit review process. For many of the mitigation sites, multiple property parcels were acquired to create a consolidated mitigation parcel.

The basis for selection of the wetland mitigation sites is described in Section 4.1 of the *Offsite Compensatory Mitigation Plan* (FEIS Appendix F-7, Appendix N, Attachment B), which enumerates the following reasons for selection of the mitigation sites:

1. The immediate work areas contain few, if any, existing wetlands, which allows for focus on re-establishment and are near or adjacent to existing NYSDEC wetlands. Delineated wetlands will be subsumed into the work area and will be either registered as rehabilitation if the area is marginal, which is usually the case, or will otherwise be subtracted from the total acreage built and corresponding credits generated. The agencies decide which option is selected;
2. The sites are in active soybean production and will stay in active agriculture until construction commences, which helps prevent invasive species and incompatible land uses;
3. Most of the six mitigation sites contain large expanses of fields with slopes of 2 percent or less;
4. NRCS soil maps show poorly drained soils such as clay or silt loam-textured soils. This was field-verified;
5. Evidence of historic wetland drainage is visible in historic and recent orthoimagery, which was verified on the ground by examining each site closely to identify signs of hydrologic alteration, including ditches, stream diversions, stream channeling, sloping, filling, surface inlets, or buried drainage structures (e.g., drainage tiles). These landscape components are key for re-establishing wetlands by disabling and reversing historic drainage practices;
6. Some ditches on the property can be filled to restore wetlands without flooding neighboring property or roads;
7. The land adjoins other properties with similar characteristics that present an opportunity to expand the site;
8. There is potential for stream restoration and the creation of a stream wetland complex.

Mitigation sites were chosen to replicate the frequency and types of wetlands impacted by the Project, using classification systems from Cowardin et al. (1979) and Edinger et al. (2014). The goal was to match physical, chemical, and biological functions between the impacted and restored ecosystems, with final wetland credit targets determined by regulatory agencies.

Sites also offer sufficient stream restoration potential to meet agency compensation needs and allow for integrated stream-wetland restoration within functioning ecological complexes. Each site was analyzed for existing wetlands to be avoided, soil characteristics conducive to wetland development (e.g., soil moisture, depth to groundwater), and topography. See FEIS Section 3.3.5.

Water Resources Comment 7:

Commenters also stated that the proposed mitigation is not close enough to the Proposed Project or downstream from the Micron Campus and should be within the same watershed.

Response: See Response to Water Resources Comment 6; Response to Oswego County Comment 7. Mitigation sites were selected based on ecological suitability and regulatory criteria outlined in Section 2.1 of the *Off-site Compensatory Mitigation Plan*. See FEIS Appendix F-7, Appendix N, Attachment B. Key factors included hydrologic conditions, watershed-scale features, compatibility with adjacent land uses, and alignment with watershed management plans, as required under 33 C.F.R. 332.2(d). Site availability was also considered. The mitigation plan includes a list of sites that were investigated within the watershed(s) (see FEIS Appendix F-7, Appendix N, Table 3.2 and Table 3.3).

Two of the proposed mitigation sites are located within the same HUC-12 watershed as the Proposed Project, and the remaining four are located within the same HUC-10 watershed. This approach is consistent with federal and state regulatory guidance and reflects a deliberate effort to prioritize proximity and ecological relevance. Additionally, mitigation sites were selected to preserve and restore lands that were likely historically wetlands prior to agricultural conversion.

The land just north of the proposed Micron Campus was explored as a potential mitigation site but the site was sold to a competing bidder. The site is being used as mitigation for another project entailing wetland impacts not associated with the Proposed Project.

Prior to final selection, all sites were pre-screened by regulatory agencies to ensure suitability. Sites were prioritized that could provide a net wetland gain—defined by the U.S. Army Corps of Engineers (USACE) as established or re-established wetlands, and by NYSDEC as restored wetlands. The Wetland Trust, Inc. (TWT) was able to meet these criteria, with 94% of the compensation developed as re-established/restored wetlands and the remaining 6% as rehabilitation/enhancement.

Priority was given to sites closer to the Micron Campus, within the same watershed, and to larger parcels capable of supporting similar ecological functions—such as flood attenuation, groundwater recharge, stormwater infiltration, wildlife habitat, habitat connectivity, carbon sequestration, and long-term sustainability.

Water Resources Comment 8:

A commenter stated that the wetland mitigation plan should include replacement of 154 acres of palustrine forested wetlands.

Response: The agencies have evaluated each distinct wetland on the WPCP for its current cover type and condition to determine the number of credits/acres that would be needed to offset the impact. In general, the mitigation will be designed to compensate the wetland and stream functions and services lost, increasing both the quantity and quality of wetlands and streams within the larger watershed because of implementing the Preferred Action Alternative

As discussed in FEIS Section 3.3.4.2, Construction Effects, Wetlands, Micron has proposed a compensatory mitigation plan to offset permanent wetland losses. The *Off-site Compensatory Mitigation Plan* (provided in FEIS Appendix F-7, Appendix N, Attachment B) describes how approximately 220.8 acres of palustrine forest (PFO) wetlands will be re-established/restored as part of the mitigation plan, including 153.1 acres of red maple-hardwood swamp, 10.1 acres of hemlock-hardwood swamp, and 57.6 acres of floodplain forest. In addition, 67.2 acres of existing PFO wetlands will be rehabilitated.

As discussed in FEIS Section 3.3.5, BMPS and Mitigation Measures, the ultimate goal of the Mitigation Plan (included in Appendix F-7) is to fully replace the suite of lost functions and services the on-site wetlands provide that would be impacted by construction of the Micron Campus. The Mitigation Plan adheres to federal and state wetland mitigation regulations with approval from USACE and NYSDEC, which determine the appropriate amount of mitigation/wetland replacement that will be required.

Water Resources Comment 9:

Commenters raised concerns about the adequacy of the proposed mitigation ratio and the ability of mitigation sites to replicate wetland services such as water quality, flood control, and ecological resources and diversity. Several commenters stated that the Proposed Project should have a greater wetland mitigation ratio because mitigation sites rarely replicate the services of undisturbed natural wetlands and there is a loss of ecological services during the time mitigation wetlands are becoming established.

Response: Micron has committed to mitigation of water resources and biological communities in coordination with the applicable resource agencies. The purpose of the mitigation plans developed by Micron is to replace lost services and ecological resources using established scientific methods and at a ratio that is on average twice the amount of wetland area being lost. As described in the *Off-site Compensatory Mitigation Plan* (FEIS Appendix F-7, Appendix N, Attachment B), and required as a condition of Micron's wetlands permits, Micron will offset impacted wetlands at a 2.2:1 rate on average. The mitigation rates for each type of wetlands can be found in Section 3.3.5 of the FEIS. These ratios are dependent upon the wetland to be impacted, cover type, and primary functions and services. For example, the proposed ratio for mitigating forested wetland losses are higher (3:1) than emergent wetland losses (1.5:1) due to the amount of time that it takes to develop a forested wetland.

Implementation of the compensatory mitigation project shall be, to the maximum extent practicable, in advance of or concurrent with the activity causing the authorized impacts. For example, all of the mitigation sites for Phase 2 impacts will be developed prior to filling wetlands. This approach will allow the opportunity to add additional wetland acres if necessary, on a realistic, adaptive timeline, thus minimizing the temporal loss of functions and services and providing compensation that tracks construction.

In addition, the proposed mitigation sites will be protected in perpetuity via a conservation easement, which will preserve the 422.2 acres required to perform the necessary wetland and stream mitigation as well as an additional 918.8 acres of existing wetlands and upland buffer. This will ensure that the mitigation sites result in large wetland / stream / upland complexes that compensate for the proposed impacts.

The mitigation sites will be monitored for 15 years following the year of completion to ensure the successful establishment of wetland vegetation and ecological function. Various vegetative performance standards have been set that will ensure the wetland mitigation sites meet or exceed ecological performance and diversity levels within the first 10 years. These goal standards include:

- Native Species Establishment: Eighty five percent (85%) relative cover of wetland re-establishment areas by native hydrophytes (FAC, FACW, or OBL).
- Forested Habitat: The areas meeting PSS criteria will have at least 400 shrubs/trees per acre, and those stems will display normal and healthy growth, free of disease and pests. At least half of the stems growing will be shrub species. For all forested wetland mitigation areas, it can be demonstrated that a minimum of 400 native, live, and healthy (disease and pest free) woody plants are growing per acre. At least half of the stems growing will be tree species.
- Invasive Species: Wetland acreage will have less than 5% relative cover of all non-*Typha* invasive plant species such as, but not limited to: purple loosestrife, common reed, and Japanese knotweed. Due to the difficulty of distinguishing the three species of cattails, as well as the likelihood that at least one of these will be present in many types of New York wetlands, the total relative cover of all invasive species, including cattails, will be less than 10%.
- Due to the propensity of reed canarygrass to colonize a farm field where farming has recently halted, the total relative cover of reed canarygrass will be less than 10%.
- VIBI: The vegetation index of biotic integrity “floristic quality” (VIBI-FQ) of the rehabilitated and re-established wetlands will be equal to or greater than 40.

Performance standards for stream mitigation have also been set and include the following for perennial reaches:

- Less than 15% increase in cross sectional area of stream reaches caused by erosion.
- A bank height ratio (BHR) less than 1.2 at riffle cross-sections.
- Entrenchment ratio (ER) greater than 1.4 at riffle cross-sections.
- Stream reach meets a Natural Resource Conservation Service (NRCS) Stream Visual Assessment Protocol Version 2 (SVAP 2) average of 7. The SVAP 2 evaluates the physical and biological parameters of restored reaches qualitatively and quantitatively. This evaluation tool provides an indication of the health of a stream and its associated riparian

area and of the functions and services they perform in the landscape. This is achieved by scoring and averaging up to 16 different stream attributes, or “elements” to derive an overall stream health score.

Ultimately, USACE and NYSDEC will determine the required mitigation ratio based on the agencies’ assessment of what would be needed to avoid wetland loss over time due to Proposed Project activities. Mitigation for the other Connected Actions is also under development and remains the responsibility of each respective Connected Action proponent and USACE and NYSDEC, as appropriate.

Micron has also developed Mitigation Plans to address the loss of biological communities associated with wetlands (FEIS Appendix G), which will be implemented in consultation with the USFWS. See also Responses to Water Resources Comment 7 and 10.

With respect to concerns about the potential for downstream flooding, such impacts would be addressed by Stormwater Management Practices (SMPs). Stormwater design and permitting will follow NYSDEC requirements at the time of permit submittal for each phase of the Proposed Project. SMPs would be implemented to preserve existing drainage patterns to the greatest extent practicable, maintain the conveyance of upland watershed runoff, control increases in stormwater volume, prevent soil erosion and sedimentation, and reduce runoff using green infrastructure where feasible. Additionally, wet extended detention ponds and bioretention filtration areas would help mitigate downstream flood risks by reducing stormwater runoff volumes. These measures also support the protection of water quality by maintaining the integrity of stormwater systems. A detailed discussion of the SMPs and overall stormwater management approach is provided in Section 3.3 and Appendix F of the FEIS. See also Response to Water Resources Comment 27.

Water Resources Comment 10:

Commenters stated that the DEIS and proposed mitigation plan fails to address long term ecological losses because it will take decades for mitigation sites to provide similar ecological services to the present wetlands, if at all. Another commenter stated that the DEIS does not quantify the ecological value over time of existing forested wetlands that will be impacted compared with mitigation wetlands which will take many years to become established. A commenter stated that the DEIS should describe the value lost by wetland impacts and the value provided by mitigation.

Response: See Response to Water Resources Comment 9. As discussed in FEIS Section 3.3.4.2, Construction Effects, Wetlands, the goal of the Mitigation Plan (included in Appendix F-7) is to fully replace the suite of lost functions and services the on-site wetlands provide that would be impacted by construction of the Micron Campus. Although the establishment, re-establishment, and rehabilitation of offsite wetlands can take years to become fully functional, implementation of the compensatory mitigation shall be, to the maximum extent practicable, in advance of or concurrent with the activity causing the authorized impacts. For example, the project proposes to develop all of the mitigation sites for Phase 2 impacts prior to filling wetlands. This approach will help minimize the temporal loss of functions and services.

Mitigation ratios have also been proposed that are designed to overcompensate for the losses based on cover type and primary functions and services. For example, the proposed ratio for mitigating forested wetland losses are higher (3:1) than emergent wetland losses (1.5:1) due to the amount of time that it takes to develop a forested wetland. In general, the mitigation would be designed to compensate for and improve the wetland and stream functions and services over those lost with minimal loss of function over time and to increase both the quantity and quality of wetlands and streams within the larger watershed compared with current conditions within the first 10 years of establishment. Mitigation sites will be monitored based on the set of ecological performance standards established for wetlands and streams. Adjustments will be made by TWT to ensure these standards are met or exceeded so that the anticipated functions/services are sustainable for the future.

The proposed mitigation sites will also be protected in perpetuity via a conservation easement, which will preserve an additional 918.8 acres of existing wetlands and upland buffer. This will ensure that the mitigation sites result in large wetland / stream / upland complexes that compensate for the proposed impacts.

The mitigation plan adheres to federal and state wetland mitigation regulations and guidance with approval from all resource agencies involved. Each distinct wetland on the Micron Campus has been evaluated for its current cover type and condition to determine the number of credits/acres that will be needed to replace the impact. The permitting process with USACE and NYSDEC is ongoing and mitigation will be a condition of Micron's permits. Mitigation for the other Connected Actions is under development and remains the responsibility of each respective Connected Action proponent. See also Response to Water Resources Comment 9.

Water Resources Comment 11:

A commenter stated that Micron should be required to purchase existing wetlands to be protected in perpetuity.

Response: Micron's mitigation plan developed in coordination with the applicable resource agencies, will establish new mitigation wetlands using a 2:1 ratio of mitigation wetlands credits to lost wetland acres.. The mitigation plan includes wetland establishment, re-establishment and rehabilitation, and the number of mitigation credits given to each of these mitigation types will be determined by USACE and NYSDEC.

As stated in the *Off-site Compensatory Mitigation Plan* (FEIS Appendix F-7, Appendix N, Attachment B): "The objective of this plan is to secure, preserve, and protect in perpetuity through conservation easements approximately 1,340 acres of upland and aquatic resources" including the rehabilitations of "113.9 acres of existing wetland, including 11.2 acres of [palustrine emergent marsh], 35.5 acres of [palustrine scrub shrub], and 67.2 acres of [palustrine forest]." Conservation easements for the mitigation sites will be held and managed by The Wetland Trust, Inc.

Water Resources Comment 12:

A commenter stated that mitigation sites should be protected in perpetuity by conservation easements or similar legal instruments.

Response: See Response to Water Resources Comment 11.

Water Resources Comment 13:

Commenters stated that excavated wetland soils, muck, and downed trees and woody debris from existing wetlands at the WPCP, which contains plant seeds, spores, and microorganisms, could be used for the establishment of new wetlands as part of the wetlands mitigation plan to accelerate the establishment of new wetlands.

Response: FEIS Section 3.8.3.2 contemplates the possible use of excavated materials, including re-use and recycling. Once construction begins, Micron will coordinate with The Wetland Trust, Inc. to assess the feasibility and practicality of moving wetland soil from the campus to the mitigation sites. However, a decision to reuse soils would have to consider the potential that the seed bank contains invasive or undesirable plant species, which could then result in the introduction and spread of invasive species at the mitigation sites. If implemented, the reuse will adhere to the provisions of the Invasive Species Management Plan (see FEIS Appendix G-9) and the Soil and Materials Management Plan (see FEIS Appendix K-7) and occur in coordination with and with approval from USACE and NYSDEC. See also Response to Geology/Soils Comment 9.

Water Resources Comment 14:

A commenter added that Micron should coordinate with the Wetland Trust and other wetland experts about reuse of wetland materials.

Response: See Response to Water Resources Comment 13.

Water Resources Comment 15:

Commenters stated that the wetland mitigation sites should be monitored long-term, under supervision of NYSDEC, to maximize functions and maintain values consistent with those wetlands that will be removed on the Micron site. Another commenter stated that water quality should be monitored to evaluate the effectiveness of all mitigation efforts with active involvement from the affected communities, including Indigenous Nations, in the oversight process.

Response: The objective of the mitigation plan is to establish, at a 2.2:1 ratio, wetlands with characteristics that are similar to or have greater value than the wetlands impacted. Micron's mitigation plan requires long-term monitoring to ensure mitigation site success. Each off-site mitigation sites will be monitored for 15 years following the year of completion to validate the successful establishment of wetland functions and ecological values. Section 7 of Micron's *Off-site Compensatory Mitigation Plan* (FEIS Appendix F-7, Appendix N, Attachment B) states that "monitoring reports will be submitted by December 31st of the monitoring year to describe

conditions in the growing season” to USACE and NYSDEC. These monitoring reports will be submitted on a schedule described in Table 8 of Section 7, including a total of 11 reports over the course of 15 years, ranging from a post-construction report at year 0 to the final report at year 15 that covers the fifteenth full year of vegetative growth. Long-term management plans will be developed and submitted with each of the individual mitigation plans for USACE and NYSDEC review and will be subject to amendments as needed as the sites develop and mature. Monitoring reports submitted to USACE and NYSDEC will be available to the public upon request.

Water Resources Comment 16:

A commenter stated that the wetland mitigation sites should be monitored for invasive species that would overwhelm desired vegetation and result in loss of wetland value and function.

Response: Performance conditions will include invasive species management which will begin before construction and continue during the entire 15-year monitoring period. The *Off-site Compensatory Mitigation Plan* (FEIS Appendix F-7, Appendix N, Attachment B) states that prior to the initiation of earthwork at the mitigation sites, invasive vegetative species management will target non-native, invasive plants identified at each site (see the Invasive Species Management Plan (ISMP) for of each individual mitigation plan in FEIS Appendix F-7, Appendix N, Attachment B) that are within the restoration work area, and any area within The Wetland Trust, Inc. ownership boundary that may present a current or future problem. Control methods may include mechanical removal, such as hand-pulling or mowing, and chemical treatments using targeted herbicide treatments or both. These actions will be timed during the appropriate season of the target species to maximize effectiveness. Invasive species control will be completed in a manner that avoids soil disturbance, reduces seed dispersal, and limits impacts on local resources. All treated areas will be monitored to ensure the effectiveness of the control measures, and follow-up treatments will be applied as necessary.

Water Resources Comment 17:

A commenter that lives near the proposed mitigation sites on Buxton Creek expressed concerns about monitoring of mosquito populations at the mitigation sites as well as herbicides used at the sites that drain into the Oneida River. Another commenter expressed concern about the selection of wetland mitigation sites in connection with endemic mosquito-borne diseases in the area and any minimization measures planned to limit mosquito populations and monitoring of same.

Response: The properties that The Wetlands Trust (TWT) would develop for the mitigation sites are located in the vicinity of existing wetlands and wet areas, so the establishment and enhancement of wetlands on the properties would not cause a substantial alteration to current conditions in the area. The intent of the mitigation plan is to establish and enhance wetlands at those sites that will develop into mature, balanced wetland ecosystems that include multiple predator species that eat mosquitoes. The mitigation plan does not include developing any artificial standing water such as cisterns or gutters where mosquitoes are unfettered by predation. The natural wetlands being considered for development have cooler water compared to artificial containers (e.g., gutters, old tires, buckets) that can harbor disease carrying mosquitoes.

With respect to invasive species control measures, such controls will be completed in a manner that avoids soil disturbance, reduces seed dispersal, and limits impacts on local resources. See the Invasive Species Management Plan (ISMP) for each individual mitigation plan in FEIS Appendix F-7, Appendix N, Attachment B.

See Responses to Oswego County Comments 38 and 39. See also Response to Water Resources Comment 16 regarding invasive species management.

Water Resources Comment 18:

A commenter stated that Micron should be required to monitor the health of remaining wetlands onsite.

Response: See Response to Water Resources Comment 27. Micron (and the proponents of the Connected Actions) will evaluate monitoring well and surface water data to identify the need for modifications to the Proposed Project or Connected Actions to avoid or minimize effects from stormwater runoff on remaining wetlands. Micron will monitor groundwater and surface water levels within the adjacent surface waters and wetlands prior to, during, and after construction to inform Micron of any adaptive management strategies that need to be implemented to maintain the health of the remaining wetlands. Any adaptive management measures will be included in a Wetland Adaptive Management Plan. In addition, as discussed in FEIS Sections 3.3.4.2 and 3.4.4.2 Micron will be required to minimize indirect effects on remaining wetlands from stormwater flows and runoff through the implementation of stormwater BMPs and by maintaining vegetative buffers. Local municipalities will be responsible for overseeing the implementation of stormwater BMPs and adaptive management measures.

Water Resources Comment 19:

Commenters expressed concern that the DEIS does not evaluate the effect of the Proposed Project's impacts on ground and surface water flows that will impact groundwater recharge on remaining and adjacent wetlands.

Response: See Responses to Water Resources Comments 18 and 27. The FEIS acknowledges that the Proposed Project has the potential to affect remaining and adjacent wetlands due to changes in hydrology from stormwater runoff and groundwater recharge. Micron will be required to implement stormwater BMPs and SMPs to reduce runoff rates, reduce erosion, and protect remaining and adjacent wetlands from contamination (FEIS Section 3.3.4.2). Additionally, groundwater and surface water monitoring wells have been installed to evaluate pre-project, during construction, and post-project groundwater and surface water conditions. Adaptive management measures will be identified in a Wetland Assessment and Monitoring Plan (Appendix O to the Micron JPA application), and may include, but are not limited to, the following:

- Adjust onsite structures (such as retrofitting culverts and risers) that contribute surface water to the offsite aquatic resources to optimize water levels and maintain existing hydrologic conditions to the extent practicable.

- Inspect condition of storm drainage infrastructure inlets/outlets and remove accumulated debris and sediment as needed to maintain functionality and minimize flow disruption to wetland areas.
- Address erosion and sedimentation issues.
- Monitor impacts/damage from mammals (e.g., beaver, muskrat) and employ control techniques (e.g., trapping and removal) as necessary.
- Modify or supplement hydrologic inputs, including temporary irrigation or rerouting clean stormwater, in response to prolonged deviations from baseline groundwater or surface water conditions, to prevent degradation of hydric soil characteristics.
- Revise and adjust subsequent design phases in response to monitoring data results that indicate adverse impacts to wetland conditions.
- Employ control measures (e.g., manual removal) to reduce invasive species aerial coverage.
- Incorporate annual adaptive management review cycles to review monitoring data results, assess management effectiveness, and implement strategies as needed.

Water Resources Comment 20:

A commenter stated that the DEIS does not adequately assess the cumulative and downstream impacts of filling ephemeral and intermittent streams.

Response: Section 3.3.4.2 of the FEIS acknowledges and evaluates the impacts to ephemeral and intermittent streams from the construction of the Proposed Project, including downgradient river and stream channels (FEIS Table 3.3-10). These effects will be minimized through the required implementation of stormwater BMPs and Stormwater Management Practices (SMPs).

Micron's construction activities would be subject to SPDES General Permit requirements, and a detailed evaluation of stormwater management and specific mitigation would be documented in Micron's SWPPP prior to operation. Micron will also be providing an analysis with the SWPPP under the NYS Community Risk and Resiliency Act (CRRA) to assess climate change, and flooding stormwater design and permitting will follow NYSDEC requirements at the time of permit submittal for each phase of the project. SMPs would be implemented to preserve existing drainage patterns to the greatest extent practicable, maintain the conveyance of upland watershed runoff, control increases in stormwater volume, prevent soil erosion and sedimentation, and reduce runoff through the use of green infrastructure where feasible. BMPs to reduce erosion, sedimentation, and sediment transport would include silt fencing, stone outlet sediment traps, compost filter socks, compost filter bag sediment traps, temporary gravel roads, and stabilized construction access (see FEIS Section 3.3.4.2, Stormwater). Additionally, wet extended detention ponds and bioretention filtration areas would help mitigate downstream flood risks by reducing stormwater runoff volumes. These measures also support the protection of water quality by maintaining the integrity of stormwater systems. A detailed discussion of the SMPs and overall stormwater management approach is provided in FEIS Section 3.3 and Appendix F.

Additionally, impacts to surface water features and floodplains due to induced residential and commercial growth, or due to other projects in the study area, would be reviewed on case-by-case basis and be subject to USACE and/or NYSDEC jurisdiction and federal, State, or local permit programs, which may require avoidance, minimization, or mitigation measures.

Water Resources Comment 21:

A commenter stated that further study of the potential impacts of the Proposed Project discharges on water quality in Oswego County is needed, including PFAS and increases in temperature.

Response: NYSDEC includes specific monitoring parameters, such as biochemical oxygen demand (BOD), total suspended solids (TSS), and flow rate, detailed in each individual wastewater discharge permit. The agency's requirements depend on the facility's design and permit type and mandate compliance with both state and federal water quality standards. The permit issued by NYSDEC will detail the specific pollutants to be monitored, the required frequency of sampling (e.g., daily, monthly, semi-annually), the concentration limits, and the approved analytical methods to be used. NYSDEC also requires PFAS monitoring provisions in its SPDES permits, including sampling for approximately 40 compounds using EPA Method 1633/1633A and leveraging state guidance values. NYSDEC may also require that the IWWTP include monitoring parameters for temperature if the agency determines that such parameters are necessary to protect aquatic resources. No further study would be required.

See Response to Oswego County Comment 11.

Water Resources Comment 22:

A commenter questioned whether chemical information will be available under the TRI reporting rule, and if so, why not disclose it now?

Response: See Response to Solid Waste and Hazardous Materials Comment 9 and 29.

For additional information regarding PFAS, see FEIS Appendix L-1.

Water Resources Comment 23:

A commenter stated that the evaluation of PFAS must use a definition of PFAS that encompasses the full PFAS class.

Response: As discussed in FEIS Section 3.8.3.2 and FEIS Appendix L-1, definitions of PFAS vary by agency and continue to evolve with regulation. USEPA and the Organization of Economic Cooperation and Development (OECD) provide detailed definitions and publish lists of materials, while New York state uses a different definition but does not publish a list of substances that meet the definition. These definitional frameworks are also discussed in NIST's "Final Programmatic Environmental Assessment for Modernization and Expansion of Existing Semiconductor Fabrication Facilities under the CHIPS Incentives Program" (2024). For purposes of the FEIS, the

agencies did not exclude consideration of any PFAS based on these definitions, taking a broad view to review potential impacts of the Proposed Project.

Water Resources Comment 24:

Commenters stated that a baseline for PFAS in current water withdrawals, upstream from the proposed discharge point, and current wastewater discharges should be measured to compare with future monitoring of Micron's wastewater discharges, and that monitoring should be coordinated among the State, County, and Micron and made publicly available.

Response: Discharges of wastewater will have to meet NYSDEC established SPDES permit standards. Micron's wastewater discharges will require an Industrial Wastewater Discharge Permit (IWDP) issued by OCDWEP in accordance with its EPA-approved Industrial Pretreatment Program. Micron will be required to comply with OCDWEP-issued IWDP permit and any other federal or state pretreatment requirements. As discussed in FEIS Section 3.8.3.2 and Appendix L-1, Micron will apply to OCDWEP for an IWDP, which will specify limits for discharges to the IWWTP, as well as monitoring and reporting requirements, including for PFAS. OCDWEP's upgraded and expanded OOWWTP (both industrial and municipal wastewater treatment plants) will require a modified SPDES permit from NYSDEC for discharge of treated wastewater to the Oneida River. NYSDEC also requires PFAS monitoring provisions in its SPDES permits, including sampling for approximately 40 compounds using EPA Method 1633/1633A and leveraging state guidance values. Specific details of monitoring plans will be determined at the time of permitting and final designs and permits are pending.

Water Resources Comment 25:

Commenters expressed concern that PFAS cannot be reliably measured because the most up-to-date methods can only detect 40 PFAS substances.

Response: The FEIS evaluation of potential impacts from wastewater containing PFAS considers the current state of technology for monitoring and treatment. As discussed in FEIS Section 3.8.3.2 and Appendix L-1, analytical techniques for measuring PFAS in various media are evolving. Government and industry groups, including semiconductor trade groups in which Micron actively participates, are working to advance the development of validated methods for accurately identifying and quantifying PFAS in various matrices, including wastewater. Presently, EPA Method 1633A is the only standardized validated method for analyzing approximately 40 PFAS in industrial wastewater. NYSDEC requires PFAS monitoring as provisions in its permits, including periodic sampling for approximately 40 compounds, using EPA Method 1633/1633A and leveraging state guidance values. Micron will be required to comply with the discharge limits for PFAS set in its IWDP from OCDWEP, employing technology that will meet those pretreatment limits on the Micron Campus prior to discharge to the IWWTP.

Water Resources Comment 26:

A commenter asked if Micron will monitor PFAS, what will be monitored, what frequency, and will the information be shared with the County. A commenter stated that

a comprehensive monitoring program for PFAS in groundwater, surface water, and effluent should be implemented with public reporting of results.

Response: See Response to Water Resources Comment 24 regarding monitoring of wastewater. The lead agencies recognize that OCDWEP will establish that monitoring of PFAS in wastewater for Micron that will occur no less than quarterly pursuant to an IWDP issued by OCDWEP and will be reported to OCDWEP. No groundwater discharges of wastewater are anticipated; accordingly, no monitoring of groundwater for PFAS is planned.

NYSDEC is responsible for monitoring NYS surface waters and does so through its Statewide Ambient Water Quality Monitoring Program (SWMP), which includes the Rotating Integrated Basin Studies (RIBS) program. RIBS is a comprehensive water quality assessment of the state's major river and stream basins on a 5-year rotating cycle. NYSDEC has included PFAS in the RIBS program.

Water Resources Comment 27:

Concerns were raised regarding water displacement runoff to adjacent properties and surrounding towns from the removal of wetlands.

Response: FEIS Section 3.3.4.2 acknowledges the potential impacts of flooding from increased surface water runoff due to the loss of water retention capacity from wetlands and surface waters. However, Micron has employed a comprehensive hydrologic modeling program as part of the development of a Wetlands Assessment and Monitoring Program. The modeling was performed under the guidance of the NYSDEC and the USGS. The results of the modeling indicate that the Micron construction would not result in significant adverse effects from stormwater or significant adverse effects on floodplains. See FEIS Section 3.3.4.2.

Further, Micron will be required to implement Stormwater Best Management Practices, or BMPs, as well as post-construction Stormwater Management Practices, or SMPs, in the final design of the Proposed Project. These BMPs and SMPs would serve to reduce stormwater runoff rates and avoid exacerbating flooding during large rain events.

Specific BMPs will include:

- Runoff rate reduction: stone check dams, slope stabilization with turf matting, perimeter dikes or swales, and rock outlet protection.
- Temporary stabilization and reduction of erosion and sedimentation: silt fencing, stone outlet sediment traps, compost filter socks, and compost filter bag sediment traps.
- Prevention of sediment transport: temporary gravel roads and stabilized construction accesses.

Proposed SMPs include wet extended detention ponds, filtration bioretention areas, stormwater planters with underdrains, dry swales, rainwater harvesting systems, green roofs, rooftop disconnections, and porous pavement. The SMPs would be designed to maintain existing drainage patterns to the greatest extent practicable, convey upland watershed runoff, control stormwater runoff, prevent soil erosion and sedimentation, and provide runoff reduction.

All BMPs and SMPs will be documented in site-specific SWPPPs and subject to regulatory oversight. Additionally, Micron is committed to ongoing coordination with relevant agencies to ensure that water quality protections remain effective.

Additionally, of the 42 groundwater monitoring wells installed as part of pre-design activities, 17 would provide a basis for developing adaptive stormwater management measures. Information gathered from the remaining 25 monitoring wells, the additional 15 surface water monitoring points (7-culvert and 8-channel), and the 5 piezometer wells proposed to be installed within wetlands around the WPCP, would be periodically assessed to determine if any alterations would need to be made to the stormwater management measures. These monitoring wells will allow for the tracking of direction of flow of groundwater as well as the height of the water table. Details can be found in Section 3.3, Water Resources, and Appendix F of the FEIS.

Water Resources Comment 28:

Commenters proposed different types of monitoring for PFAS and other chemicals. A commenter stated that monitoring should be required for all fluorinated compounds in wastewater. Another commenter suggested that Micron test wastewater using analytical methods that include the whole range of PFAS such as TOPS and total adsorbable fluorine and/or total fluorine. Another commenter stated that Micron should use methods that detect total organic fluorine and limited fluorinated compounds all together. Another commenter recommended testing for total organic fluorine and total oxidizable precursors and all of the chemicals listed in Appendices C and D of the CHIPS Program Office Final Programmatic Environmental Assessment, dated June 28, 2024.

Response: See Responses to Water Resources Comments 24 and 25. FEIS Appendix L-1 also discusses the evolution of PFAS analytical methods and the limitations of these evolving technologies. As discussed in FEIS Appendix L-1, Micron's IWDP and OCDWEP's SPDES permit will include periodic monitoring and reporting requirements for PFAS. As analytical methods evolve, such requirements will be updated appropriately.

Water Resources Comment 29:

A commenter stated that Micron must commit to measures that avoid and minimize the significant adverse effects from the Project's use and release of PFAS, including periodic surface water, groundwater, and fish monitoring; periodic monitoring of drinking water wells; monitoring of pretreatment wastewater before and after pretreatment; funding of monitoring at Oak Orchard; evaluating PFAS to be used and seek alternatives; and establishing a research fund for developing alternatives to PFAS.

Response: Government and industry groups, including semiconductor trade groups in which Micron actively participates, are working to advance the development of validated methods for accurately identifying and quantifying PFAS in various matrices, including wastewater. As discussed in FEIS Section 3.8.3.2 and Appendix L-1, Micron is evaluating potential non-PFAS containing alternatives to the chemistries, equipment, and materials used in semiconductor fabrication. This includes partnering with several suppliers to explore non-PFAS alternatives, as well as engagement with the broader semiconductor industry through groups like the World

Semiconductor Council (WSC), the Semiconductor Industry Association's PFAS Consortium, SEMI, and the National Science Foundation/ Semiconductor Research Corporation, as further discussed in Micron Technology's 2025 Sustainability Report (chemical management). Presently, there are no known, drop-in substitutes for many critical PFAS uses in semiconductor fabrication, and substitutions will require fundamental changes in the design of processes, materials, and facilities in ways that are currently unknown.

Micron will be subject to monitoring and reporting requirements as part of its IWDP issued by OCDWEP in accordance with its EPA-Approved Pretreatment Program. NYSDEC also requires PFAS monitoring in SPDES discharge permits, which would be required for both the Oak Orchard IWWTP and OOWWTP (collectively the IWWTP and municipal WWTP). See also Response to Solid and Hazardous Waste Comment 48 regarding protective measures from releases and spills. See also Response to Water Resources Comment 24, 28 and 40.

Water Resources Comment 30:

A commenter stated that Micron should monitor wastewater using GIS or remote sensing over traditional grab sampling.

Response: The lead agencies will require only that Micron comply with the monitoring requirements specified in its permits. Any additional or different monitoring may be considered by Micron in coordination with the applicable resource agencies and in accordance with applicable regulatory requirements.

Water Resources Comment 31:

A commenter stated that the effectiveness of the treatment of hazardous substances in wastewater should be confirmed by independent monitoring.

Response: Micron's wastewater discharges will require an IWDP issued by OCDWEP in accordance with its EPA-approved Pretreatment Program. Monitoring and reporting of PFAS in wastewater will be required of Micron under its IWDP. OCDWEP's discharges are covered by a SPDES permit issued by NYSDEC, which is currently being modified. SPDES permits establish effluent limitations and monitoring requirements for the OOWWTP to ensure compliance with established SPDES limits. Specifically, with respect to the IWWTP, "OCDWEP would be responsible for ensuring that operation of the IWWTP complies with SPDES [collectively the IWWTP and municipal treatment plant] permit conditions, including effluent limitations and water quality standards under ECL Article 17 and 6 NYCRR Part 703...OCDWEP would coordinate with NYSDEC to perform regular analytical testing of effluent sampling and surface water samples and would comply with ongoing monitoring, reporting and sampling requirements." See FEIS Section 3.4.4.2, Connected Actions.

NYSDEC requires that wastewater samples be collected and then analyzed by certified laboratories. The results are then routinely reported to NYSDEC. Laboratories are certified by the New York State Department of Health (NYSDOH), which operates the Environmental Laboratory Approval Program (ELAP) program. As part of the ELAP program, NYSDOH audits these laboratories periodically.

Water Resources Comment 32:

A commenter stated that Micron is working under a faulty assumption that the transformation of PFAS into “shorter chain PFAS” makes the PFAS safer.

Response: As discussed in FEIS Sections 3.3.4.2 and 3.8.3.2 and Appendix L-1, Micron continues to assess emerging PFAS wastewater technologies capable of addressing PFAS, including technologies capable of removing both long- and short-chain PFAS at the Micron Campus. It is anticipated that Micron’s IWDP issued by OCDWEP will include limits and monitoring requirements for PFAS. The FEIS and Appendix L-1 also address multiple approaches to providing for the proper management of PFAS substances by Micron. See also Response to Water Resources Comment 29.

Water Resources Comment 33:

A commenter questioned whether the technologies listed in the DEIS are capable of treating PFAS in semiconductor waste to the ppt level?

Response: As discussed in FEIS Sections 3.3.4.2 and 3.8.3.2. and Appendix L-1, Micron will be required to comply with the discharge limits established by OCDWEP in its IWDP, employing technology on the Micron Campus that will meet those limits. Micron continues to assess emerging PFAS wastewater technologies capable of addressing PFAS at the part per trillion levels found in semiconductor fabrication wastewater prior to treatment and that will meet limits specified in the Micron Campus’s IWDP. This includes review of available literature that has identified a suite of candidate technologies for potential inclusion in the Proposed Project, including technologies identified as best available technology under 40 CFR 141.61(d), Table 3. This assessment includes segregation and destruction capabilities, removal or destruction efficacy of various chain lengths, effectiveness of technologies alone or in combination, and management options for PFAS-containing waste generated during treatment.

Micron is also working with various semiconductor industry groups to pursue PFAS pollution prevention and treatment options, as discussed in Micron Technology’s 2025 Sustainability Report. Early evaluations suggest that the most effective wastewater treatment solution for the Proposed Project will involve installation of PFAS segregation technology targeted to the relevant process wastewater streams.

Water Resources Comment 34:

A commenter requested a commitment from Micron to use the best available treatment technology to remove PFAS to the ppt level onsite, include PFAS in continuous effluent monitoring requirements, and allocate funding for third party verification.

Response: See Responses to Water Resources Comments 24, 31, and 33.

Water Resources Comment 35:

Commenters stated that Micron should ensure that wastewater is free from chemicals before releasing it through the use of state-of-the-art treatment technology, such as reverse osmosis, advanced oxidation or surface plasma treatment, at the Micron Campus or paid for by Micron at the wastewater treatment plant. Another commenter expressed a similar concern about the treatment of PFAS by Micron before wastewater leaves the plant and investment in PFAS treatment processes as they become available over time. Another commenter stated that strict pretreatment standards should be enforced.

Response: See Responses to Water Resources Comments 24, 33 and 34. OCDWEP will establish PFAS limits in Micron's IWDP. To meet these discharge limits, Micron will employ on-site pretreatment prior to discharge to the IWWTP.

Water Resources Comment 36:

Micron should provide additional detail on the PFAS treatment systems proposed for its on-site Industrial WWTP, including an assessment of where PFAS removed from the process wastewater will end up. Unless Micron can show that PFAS will fall out elsewhere in the treatment process, the sludge from the on-site industrial WWTP should be considered hazardous and not suitable for land application as fertilizer or soil enhancer.

Response: Additional details on PFAS pretreatment systems are included in FEIS Appendix L-1. As summarized in Exhibit C of this Appendix, there is a suite of candidate technologies available for potential inclusion in the Proposed Project that require further evaluation to determine their suitability, scalability, and configuration within semiconductor fabrication facility wastewater systems. Promising developments include technologies that may break the carbon-fluorine bonds, thereby reducing cost and risk associated with secondary waste streams. Such technologies may be used in tandem with other proprietary technologies that Micron similarly is scrutinizing for appropriateness. Detailed, site-specific design will determine the technology or technologies selected based on factors such as the candidate technologies' capabilities, the commercial viability of the treatment vendors, the feasibility of any necessary pretreatment, and their operational characteristics, but the existence of effective treatment and destruction technologies is not currently in doubt.

Regardless of the final technologies selected, Micron will be required to meet discharge limits that OCDWEP will impose in Micron's IWDP, employing onsite PFAS wastewater treatment necessary to meet discharge limits. See also Responses to Water Resources Comments 33 and 34 and Nation Comment 17.

Solids/sludge will be disposed of according to applicable regulations and the materials management framework discussed in FEIS Appendix L-1.

Water Resources Comment 37:

A commenter stated that Micron, not OCDWEP, should be responsible for the treatment of PFAS in wastewater from Micron's operations.

Response: See Responses to Water Resources Comments 25, 33, and 34. Micron will be required to meet discharge limits specified in the IDWP issued by OCDWEP and will employ onsite PFAS wastewater pretreatment necessary to meet the discharge limits. See FEIS Appendix L-1.

Water Resources Comment 38:

Commenters generally stated that current legal standards for PFAS are insufficient. One commenter stated that there are no monitoring requirements on water permits. Other commenters stated that compliance with permit terms does not mean that there will be no significant environmental effects because there are not federal or state drinking water standards for all types of PFAS (only two types have drinking water standards in NY and six currently under federal law).

Response: The lead agencies acknowledge that the regulatory standards for PFAS are evolving. With this backdrop, the FEIS evaluates the potential environmental effects of PFAS and the avoidance and mitigation measures to address such effects based on the information that is currently available and the current state of monitoring and treatment technologies. The FEIS also acknowledges that government and industry groups, including semiconductor trade groups in which Micron actively participates, are working to advance the development of validated methods for accurately identifying and quantifying PFAS in various matrices, including wastewater, and that regulatory standards may change over time.

Limits and controls established for specific PFAS prioritized for regulation would reasonably be expected to provide benefits and adequate levels of protection for other PFAS as well. PFAS also would be addressed cumulatively by the other regulatory controls, including appropriate storage and handling of chemicals, and spill prevention planning, as discussed in the FEIS. See Response to Solid and Hazardous Waste Comment 48. Further, review of available technologies is not limited to those effective on only currently-regulated PFAS or to any subset of PFAS for which approved analytical methods in wastewater exist. Micron is also working with various semiconductor industry groups to pursue PFAS pollution prevention and treatment options, as discussed in Micron Technology's 2025 Sustainability Report.

Water Resources Comment 39:

A commenter stated that a "mixing zone" downstream from the water treatment plant will not ameliorate impacts from PFAS, because PFAS are persistent in the environment and there are no water quality criteria or acute toxicity values for the majority of the PFAS that Micron would discharge.

Response: See Response to Water Resources Comment 38. Treatment of PFAS in the FEIS does not rely on dilution in a mixing zone to meet compliance requirements. Industrial wastewater generated on the Micron Campus that is not treated at the campus for reuse would be treated on

the Micron Campus to levels necessary to meet discharge limitations (including for PFAS) contained in an IWDP issued to Micron by OCDWEP prior to being sent to the IWWTP at the Oak Orchard Site. Micron's IWDP would be based on a USEPA-approved Industrial Pretreatment Program and the individual SPDES permit issued by NYSDEC to OCDWEP pursuant to ECL Article 17 (6 NYCRR Part 750) to authorize discharge of treated industrial wastewater from the IWWTP into surface waters of the Oneida River.

Water Resources Comment 40:

Commenters stated that reliance on future wastewater permits and descriptions of the types of pollution control technologies Micron intends to use (without any commitment), are insufficient to assess the environmental risk of wastewater discharges. Another commenter stated that permits and the plans on which those permits will rely have not been finalized.

Response: See Responses to Water Resources Comments 31 and 38. Pretreatment limits will be met by Micron for discharge to the Oak Orchard IWWTP, and the IWWTP treatment performance will be validated to meet SPDES discharge limits. As discussed in FEIS Section 3.8.3.2 and Appendix L-1, OCDWEP will issue an IWDP to Micron that will include PFAS wastewater discharge limits. Micron will implement wastewater pretreatment to meet these limits. The OCDWEP IWWTP/OOWWTP discharges are subject to the SPDES permitting program, which includes public participation, technical review, and enforceable conditions that ensure environmental protection. As such, while specific technologies may evolve, the regulatory oversight and performance standards remain robust and enforceable.

During the permitting process, regulatory agencies establish effluent discharge limits designed to protect public health, safety, and welfare. These limits are based on applicable federal and state regulations and are informed by the anticipated characteristics of the wastewater and the capabilities of the treatment technologies. SPDES permits require that effluent samples be collected regularly and analyzed by certified laboratories. The results of these analyses are then routinely submitted to NYSDEC to demonstrate compliance with permit conditions. Effluent limitations are determined using two main approaches:

1. Technology-Based Effluent Limitations (TBELs):

These are based on the capabilities of current treatment technologies and reflect the best practicable control methods available. TBELs are often standardized across industries.

2. Water Quality-Based Effluent Limitations (WQBELs):

These are customized to ensure that discharges do not violate water quality standards in the receiving water body.

Once these limits are established, Micron and OCDWEP will be required to conduct regular sampling and analysis of the treated effluent using NYSDEC-approved methods.

Typical monitoring requirements include:

- Numerical limits for specific pollutants
- Action levels and response protocols
- Reporting schedules and data submissions to NYSDEC

These safeguards ensure that any discharge from the Micron Campus meets strict environmental standards and does not compromise water quality.

While final plans and permits are still under development, the regulatory framework ensures that effluent limits will be protective of water quality and public health. These limits are subject to revision during permit renewals, often becoming more stringent as treatment technologies and analytical methods improve. Since issuance of the notice of DEIS, OCDWEP has submitted an application to the NYSDEC for modification of the current SPDES permit.

Water Resources Comment 41:

A commenter stated that a Pretreatment Program should be implemented and that no discharges of any wastewater with PFAS should be discharged to the wastewater treatment plant. A commenter stated that Micron should be required to use methods that destroy, rather than remove, PFAS, such as supercritical water oxidation.

Response: See Responses to Water Resources Comments 33, 34, and 38. NYSDEC will determine the SPDES permit effluent limit specifications in accordance with federal, state, and local guidelines for the Oak Orchard IWWTP to protect surface waters, groundwater, and aquifers. OCDWEP's EPA-approved Industrial Pretreatment Program will impose wastewater discharge limits for PFAS and other pollutants by Micron prior to discharge to the Oak Orchard IWWTP. This discharge will be closely monitored to ensure compliance with Micron's IWDP limits set by OCDWEP and any other applicable federal or state pretreatment requirements in order to protect Oak Orchard IWWTP treatment processes and ensure the IWWTP's compliance with NYSDEC-established discharge limits. Micron will comply with anticipated discharge limits, employing technology that will meet those limits. NYSDEC will determine the SPDES permit effluent limit specifications for the Oak Orchard OOWWTP (both the IWWTP and municipal wastewater treatment plant) to protect surface waters, groundwater, and aquifers.

Micron continues to review evolving wastewater treatment technologies, including both segregation and destruction technologies, capable of meeting anticipated discharge limits to the IWWTP. Currently available information suggests that localized application of segregation and concentration technologies are the most effective treatment for Micron's operations. If additional treatment is needed to meet discharge limits, Micron will evaluate such additional treatments.

Water Resources Comment 42:

A commenter stated that Micron should be prevented from operating until the wastewater treatment plant upgrade is complete and has demonstrated the ability to treat PFAS waste without any "pass through."

Response: The regulatory definition of "pass through" in 40 CFR §403.3(p) refers to a "[d]ischarge which exits the POTW into waters of the United States in quantities or concentrations which, alone

or in conjunction with a discharge or discharges from other sources, is a cause of a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation).” Micron would be required to comply with discharge limits and applicable pretreatment standards under its IWDP prior to discharge to the IWWTP that are protective of the OOWWTP SPDES permit limitations.

OCDWEP’s new wastewater treatment systems will be carefully tested during start up to make sure effluent is within the compliance parameters set forth by the NYSDEC for discharge to the Oneida River.

Water Resources Comment 43:

A commenter stated that permits issued to Micron and the wastewater treatment plant should include effluent limitations and/or new source performance standards for all PFAS that Micron knows or foresees will be discharged. The permit should also include best management practices to control or abate discharges and prohibit land application of biosolids.

Response: See Responses to Water Resources Comments 38 and 42 and Nation Comment 17. Any land application of biosolids would occur only in compliance with applicable legal requirements. No PFAS new source performance standards exist for semiconductor wastewater discharging to a POTW. FEIS Appendix L-1 provides further detail on the framework for management of PFAS-containing materials that will comply with applicable legal requirements and be consistent with USEPA’s guidance on treatment and disposal of PFAS-containing materials.

Water Resources Comment 44:

Commenters stated that the DEIS does not address the treatment of discharges during construction and initial operations before the wastewater treatment plant upgrade.

Response: FEIS Sections 2.1.8 and 3.10.3.2 address construction and initial operations while the wastewater treatment plant is being upgraded. As described in FEIS Section 3.10.3.2, Preferred Action Alternative, under Wastewater Treatment and Discharge Capacity, the Oak Orchard Wastewater Treatment Plant (OOWWTP) will receive both sanitary wastewater and startup industrial wastewater from the Micron Campus.

The Onondaga County Department of Water Environment Protection (OCDWEP) has determined that it can handle Micron’s initial flow (Years 1-4) with its current facilities. During this interim period OCDWEP will also be constructing its IWWTP. The staged approach ensures that wastewater discharges are managed responsibly throughout all phases of development. Once Micron begins production, all operational industrial wastewater flows from Micron will be directed to the IWWTP in compliance with Micron’s IWDP.

See also Response to Water Resources Comment 37 regarding water reclamation and reuse.

Water Resources Comment 45:

Commenters stated that Micron should be required to evaluate PFAS alternatives to reduce or eliminate their use. Another commenter stated that these efforts should be reviewed by the Involved Agencies and compared with baseline data at Micron's expense. Another commenter stated that PFAS alternatives already exist and could be implemented.

Response: Micron's ongoing efforts to evaluate PFAS alternatives is discussed in FEIS Appendix L-1.

Water Resources Comment 46:

Commenters asked about the location of the wastewater discharges and if holding ponds will be used onsite.

Response: Wastewater will be discharged through a new outfall, located in the same general vicinity as the existing outfall in the Oneida River. Once the Oak Orchard sanitary WWTP upgrade is complete (a project independent of the Preferred Action Alternative), it will not require the existing lagoons, which will be removed from the site.

Holding ponds related to industrial wastewater discharges are not anticipated.

Water Resources Comment 47:

Commenters expressed concerns that the Proposed Project discharges will impact other water bodies, including Onondaga Lake, the Seneca River, and the Upper St. Lawrence River.

Response: Onondaga Lake and the Seneca River upstream of the Three Rivers Junction are not downstream of the Oak Orchard outfall and would not be impacted. Surface water bodies significantly downstream of the Oak Orchard WWTP outfall such as Lake Ontario and Upper St. Lawrence River are not expected to be impacted by wastewater from the Proposed Project.

The existing NYSDEC SPDES permitting process is protective of water quality standards for downstream water bodies.

See also Responses to Water Resources Comments 31, 37, 39, 40, and 44.

Water Resources Comment 48:

Commenters raised concerns about the impact of spills and wastewater discharges on drinking water, including municipal water intakes.

Response: See Response to Water Resources Comment 47; Response to Solid Waste and Hazardous Materials Comment 48. The reclamation, reuse, pre-treatment, and treatment of industrial wastewater discharges in conformance with permitting requirements, as well as the

immediate response to any spills as directed under various spill plans described in these Responses and the FEIS, will avoid impacts to drinking water, including municipal water intakes.

Water Resources Comment 49:

A commenter raised concerns about chemicals polluting farms.

Response: See Response to Water Resources Comment 48. Treated wastewater effluent will not be discharged to farms. Solids will be disposed of according to applicable regulations.

Water Resources Comment 50:

A commenter stated that the DEIS does not consider the impact from the need for additional water and wastewater treatment and upgrades in other jurisdictions, including Oswego County, due to induced growth effect or Connected Actions.

Response: See Response to Oswego County Comment 34.

Water Resources Comment 51:

A commenter stated that the DEIS did not consider the risk of leachate discharges from landfills that accept wastewater treatment sludge containing PFAS from the wastewater treatment plant treating Micron's wastewater discharges.

Response: FEIS Section 3.8.3.2 and the Appendix L-1 identify and discuss a range of wastewater treatment technologies and disposal options for different types of generated waste at the proposed Micron Campus.

USEPA's current interim guidance on PFAS destruction and disposal describes the agency's latest assessment of the available methods for treatment and management of the PFAS-containing waste. Micron will use this and other guidance to assess suitable methods for disposal and management of PFAS-containing waste and will comply with applicable laws for the safe and proper disposal of any generated solid and hazardous waste.

OCDWEP will comply with NYSDEC solid waste disposal regulations and policies for disposal of biosolids generated from the Oak Orchard IWWTP treatment process.

Water Resources Comment 52:

Commenters are concerned that contamination from the Micron site would end up in the water supply intake in Lake Ontario and in the Oneida River (and other surface waters).

Response: See Responses to Water Resources Comments 40, 47, and 48.

Water Resources Comment 53:

Commenters raised general concerns about the nature, impacts, ability to treat, and monitoring of wastewater from Micron's manufacturing processes, including concerns about the presence of "forever chemicals," and how wetlands, water resources, and drinking water will be protected.

Response: See Responses to Water Resources Comments 24, 25, 33, 34, 37, 40, 47, and 48. Untreated wastewater will not be discharged into any waterbody. FEIS Section 3.3.4.2 discusses the management and treatment of wastewater at the Micron Campus prior to discharge.

Water Resources Comment 54:

The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.

Response: The FEIS, which has been reviewed by the federal and state agencies with regulatory authority and expertise in water quality and protection of ecological resources, fully addresses reasonably foreseeable impacts to hydrological and ecological resources in Section 3.2 (Geology, Soils, and Topography), Section 3.3 (Water Resources), and Section 3.4 (Biological Resources). These sections evaluate the Proposed Project's reasonably foreseeable effects on wetlands, water quality, groundwater, surface water, and ecological communities. Relative to surface water and groundwater, Micron is implementing a Wetlands Assessment and Monitoring Plan (Appendix O to the Micron JPA application) to monitor groundwater and surface water flow as a means of assessing the potential for impacts to onsite and downstream wetlands that might occur as a result of construction and operational activities at the site. Should impacts be identified, adaptive management measures would be implemented to ensure the continued success of these wetlands. Where significant impacts to wetlands and surface water streams may occur, the avoidance, minimization, and mitigation measures described in Sections 3.3.4.2 and 3.3.5 of the FEIS, and as required by federal and state law, would be implemented.

As part of its application for a Clean Water Act (CWA) Section 404 permit from U.S. Army Corps of Engineers (USACE), and a Freshwater Wetlands Permit (ECL Article 24, Title 7) from New York State Department of Environmental Conservation (NYSDEC), Micron has proposed a comprehensive Offsite Compensatory Wetland and Stream Mitigation Plan (CWSMP) to offset wetland losses. The CWSMP details very specific measures that will be utilized to compensate for onsite losses of wetlands and jurisdictional streams from onsite construction activities. FEIS Section 3.3.4.2, Table 3.3-10 identifies the indirect long-term effects on downgradient river and stream channels and their water quality conditions, including sediment transport, nutrient loading, and water quality impacts. The USACE and NYSDEC have oversight and approval authority of the CWSMP and are working with Micron to ensure the adequacy of the plan.

Additionally, ecological features, soil types, and other related elements have been considered in Section 3.4.4.2 of the FEIS (evaluation of ecological communities), the Biological Assessment (BA) (FEIS Appendix G-4), and the State Incidental Take Permit application (Appendix Q of the Micron JPA application). The permitting process with USACE and NYSDEC, including the development of appropriate mitigation measures, is ongoing and provides another avenue for regulatory oversight by agencies with jurisdiction and expertise in these areas. Section 3.4.5 of the FEIS describes BMPs and mitigation measures that would be implemented for the protection of ecological communities and specific species. See also Response to Water Resources Comment 6 and Water Resources Comment 19.

Water Resources Comment 55:

Commenters expressed concerns about increased stormwater runoff and flooding risks downstream of the Proposed Project (including Fulton, Phoenix, and near Stearns Road) from severe weather events, loss of streams and wetlands, excavation, and increased impervious surfaces.

Response: See Responses to Water Resources Comments 20 and 27. As discussed in FEIS Section 3.3.4.2, construction activities would be subject to NYSDEC SPDES Construction General Permit requirements. Stormwater design and permitting will follow NYSDEC requirements at the time of permit submittal for each phase of the project. Stormwater BMPs would be designed to meet performance criteria in the New York State Standards and Specifications for Erosion and Sediment Control Manual and would be appropriately documented in relevant SWPPPs. Stormwater management areas would be designed to meet New York State Stormwater Management Design Manual requirements to ensure waters of the State are protected from adverse impacts of construction stormwater runoff and no downgradient increases in stormwater quantity would occur. These evaluations would be completed with plan documentation in Micron's SWPPP development prior to operation in accordance with NYS stormwater permitting requirements. With these measures in place the FEIS properly concludes that stormwater discharge from the Micron Campus would not result in adverse impacts.

During operations, SMPs would be implemented to preserve existing drainage patterns to the greatest extent practicable, maintain the conveyance of upland watershed runoff, control increases in stormwater volume, prevent soil erosion and sedimentation, and reduce runoff through the use of green infrastructure where feasible. Additionally, wet extended detention ponds and bioretention filtration areas would help mitigate downstream flood risks by reducing stormwater runoff volumes. These measures also support the protection of water quality by maintaining the integrity of stormwater systems. These operational SMPs would be documented in the SWPPP required under the Multi-Sector General Permit (MSGP) and would include monitoring conditions. The SMPs would be adaptively managed and refined over time, as appropriate, based on ongoing water level and flow monitoring. A detailed discussion of the SMPs and overall stormwater management approach is provided in FEIS Section 3.3.4.2 and Appendix F.

Water Resources Comment 56:

Commenters expressed concerns about flooding risks downstream of the Proposed Project from increased discharges of wastewater to the Oneida River.

Response: See Responses to Water Resources Comments 20, 27, and 55 regarding stormwater discharges. With respect to wastewater, wastewater discharges attributable to the Proposed Project will gradually increase over a 15-year timeframe. Regardless, the discharge from the OOWWTP treatment systems is a minor component of the flow in the Oneida River. Statistically, for the period of record for the Oneida River (going back to 1996), average flow of the Oneida River at the closest monitoring location (Euclid) is 3000 cfs and the maximum flow is 10,600 cfs. For reference the Oak Orchard WWTP discharge at 20MGD is 31 cfs. Peak flows from Oak Orchard IWWTP combined with peak flows from sanitary from the Oak Orchard municipal WWTP would be up to 59 MGD (4 Fabs at 34 MGD plus sanitary at 25 MGD) would be less than 2% of average flow and less than 1% of maximum flow.

Water Resources Comment 57:

Commenters expressed specific concerns regarding displaced wetlands causing flooding on properties immediately adjacent to the Proposed Project (north of the campus on Mud Mill Road; and on Caughdenoy Road).

Response: Mud Mill Road and that portion of Caughdenoy Road that runs north of the Micron Campus are located at a minimum of approximately 0.32 miles away from the campus footprint. In addition, most of the wetland displacement occurs in the southern portion of the campus site. Finally, these roads and the Micron Campus are not currently within FEMA designated floodplains. With the proposed BMPs, together with the measures that will be included in the SWPPP, and the adaptive management of stormwater and groundwater levels in the vicinity, there is no risk of flooding conditions changing north of the Micron Campus. See FEIS Appendix F-8 for the draft SWPPP of Phase 1a of the Micron Campus.

See also Responses to Water Resources Comments 20, 27, and 55.

Water Resources Comment 58:

Commenters expressed concerns that increased runoff will flood basements and impact septic systems downstream.

Response: See Responses to Water Resources Comments 27 and 55. As described in FEIS Section 3.3.4.2, Micron would develop stormwater designs that comply with the *New York State Stormwater Management Design Manual* and are approved by the NYSDEC and the appropriate local authority to maintain water quality and quantity volumes as compared to pre-construction conditions.

Water Resources Comment 59:

Commenters expressed concerns about whether the construction of a sewer system for the Project will affect the water table, causing more flooding.

Response: The Proposed Project relies on water withdrawn and returned to Lake Ontario following treatment. Construction of the sewer system will not affect the water table or cause more flooding. See also Responses to Water Resources Comments 27 and 55. The construction of Connected

Actions will be subject to NYSDEC's permitting requirements and associated Stormwater BMPs to prevent increased stormwater runoff during construction. See also Response to Water Resources Comment 86.

Water Resources Comment 60:

Commenters stated that there is insufficient information to assess whether stormwater management and wetland restoration measures will address flooding impacts. Other commenters stated that more analysis is needed regarding stormwater retention to address flood risk and runoff pollution, including hydrologic modeling and engineered mitigation plans.

Response: See Responses to Water Resources Comments 20, 27, 55 and 62. A detailed discussion of the SMPs and overall stormwater management approach is provided in FEIS Section 3.3 and Appendix F.

Water Resources Comment 61:

A commenter stated that the DEIS does not evaluate potential flood risk from increased paved surfaces due to additional roads that will be built.

Response: See Responses to Water Resources Comments 27 and 55. Site-specific stormwater modeling and design will be conducted during the permitting phase to ensure runoff from all new impervious surfaces, including roads, are properly managed. The measures identified in FEIS Section 3.3.4.2, Table 3.3-11 (Proposed SMPs) would reduce stormwater runoff and help minimize potential flood risks.

Water Resources Comment 62:

Commenters stated that the DEIS does not provide a detailed stormwater management plan to mitigate downstream flooding or calculations for stormwater runoff. Another commenter stated that Micron must provide detailed stormwater modeling and management plans as part of its Environmental Impact Statement. Independent experts should review this modeling and downstream communities should be included in the decision-making process around acceptable levels of flood risk.

Response: See Responses to Water Resources Comments 27 and 55. Micron has conducted comprehensive stormwater/hydrologic monitoring in coordination with NYSDEC and USGS to assess the potential for flooding to occur downstream once construction has been completed. As discussed in the FEIS, construction of the Proposed Project would not result in significant adverse effects from stormwater or significant adverse effects on floodplains. See FEIS Section 3.3.4.2. Micron's construction activities would be subject to SPDES Construction General Permit requirements, and a detailed evaluation of stormwater management and specific mitigation would be documented in Micron's SWPPP prior to operation. NYSDEC will be involved in the review of stormwater calculations and design in connection with the preparation of a SWPPP under

NYSDEC's Construction General Permit and post-construction SMPs. The draft SWPPP is included in FEIS Appendix F-8.

Micron will also be required to implement a Monitoring Plan for surface water, groundwater, and vegetation, that is integral to understanding baseline conditions, thereby enabling analysis of potential hydrologic changes resulting from construction activities and placement of buildings. The findings will help inform adaptive management measures to address groundwater and surface water flow. The Monitoring Plan is built around data collected from 42 installed groundwater monitoring wells, 15 surface water monitoring stations, and infield vegetative monitoring plots that will be coupled with high resolution imagery. Baseline monitoring is ongoing.

Water Resources Comment 63:

A commenter stated that the DEIS lacks a stormwater modeling and management plan that accounts for climate change, regional development, and volume of wastewater discharges to mitigate downstream flooding risk.

Response: See also Responses to Water Resources Comments 27, 55, and 62.

Water Resources Comment 64:

A commenter stated that the Final EIS should specify that the permanent stormwater design will meet the New York State Stormwater Design Manual requirements in effect at the time of the design of each phase of permanent stormwater features.

Response: The FEIS includes updates to clarify that the stormwater design will meet the requirements of the New York State Stormwater Management Design Manual that is in effect at the time of approval. See FEIS Section 3.3.4.2, Stormwater.

Water Resources Comment 65:

A commenter stated that water quality impacts from stormwater from the Rail Spur, Childcare Site, and wastewater treatment plant expansion are not addressed.

Response: BMPs and SMPs related to construction and operations for these sites are discussed in FEIS Section 3.3.4.2. These SMPs include green infrastructure, wet extended detention ponds, and bioretention filtration areas, which are intended to reduce pollutant loads and manage runoff volumes effectively. Each project component, including the Rail Spur and Childcare Site, will be subject to site-specific stormwater design and permitting in accordance with NYSDEC requirements at the time of permit submittal.

As required, the IWWTP construction design at the Oak Orchard site will follow NYSDEC stormwater management plans and requirements for construction activities. Once constructed, OCDWEP will follow the requirements of the NYSDEC's Multisector General Permit for Stormwater Discharges (GP-0-23-001) Sector T – Treatment Works. These stormwater permitting requirements are designed to protect water quality.

See also Responses to Water Resources Comments 27 and 55.

Water Resources Comment 66:

A commenter stated that the DEIS does not analyze sediment transport, nutrient loading, or water quality impacts from the construction of the Micron Campus and construction of utilities.

Response: FEIS Section 3.3.4.2, Table 3.3-10 identifies the indirect long-term effects on downgradient river and stream channels and their water quality conditions, including sediment transport, nutrient loading, and water quality impacts. To minimize these indirect effects, Micron, National Grid, OCWA, and OCDWEP would implement various stormwater BMPs to reduce stormwater runoff rates, reduce erosion of disturbed land and downgradient sedimentation, and protect stormwater from contamination before and during Proposed Project and Connected Action construction activities. BMPs to reduce runoff rates would include stone check dams, slope stabilization with turf matting, perimeter dikes or swales, and rock outlet protection. BMPs to provide temporary stabilization and reduce erosion and sedimentation would include silt fencing, stone outlet sediment traps, compost filter socks, and compost filter bag sediment traps. BMPs to prevent sediment transport would include temporary gravel roads and stabilized construction accesses. All BMPs would be designed to meet the performance criteria in the New York State Standards and Specifications for Erosion and Sediment Control (NYSDEC, 2016) manual and would be appropriately documented in relevant SWPPPs. Stormwater management areas would be designed to meet New York State Stormwater Management Design Manual requirements in effect at the time of approval to ensure waters of the State are protected from adverse impacts of construction stormwater runoff and no downgradient increases in stormwater quantity would occur.

Water Resources Comment 67:

A commenter stated that sufficient information has not been provided to take a hard look at stormwater runoff and make a reasoned judgement justifying that the proposed 66.6 acres stormwater management and wetland restoration plans fully mitigate the water quantity and quality of increased runoff and loss of wetlands on the site.

Response: See Responses to Water Resources Comments 9, 20, 27, and 55.

Water Resources Comment 68:

A commenter stated that additional details are needed on Micron's use of temporary sediment erosion controls.

Response: FEIS Section 3.3.4.2 identifies construction-related BMPs to prevent or minimize potential soil erosion, including silt fencing, stone outlet sediment traps, compost filter socks, compost filter bag sediment traps, temporary gravel roads and stabilized construction accesses. See also Responses to Water Resources Comments 27, 55, and 66.

Water Resources Comment 69:

A commenter stated that the SWPPP and site grading plans should be publicly available.

Response: Preliminary SWPPP information and site grading plans for the Micron Campus and the Rail Spur were included with the Clean Water Act Section 401 Water Quality Certification (WQC) application submitted to the NYSDEC and are available to the public. A draft SWPPP was provided to NYSDEC and the Town of Clay and is included in FEIS Appendix F-8.

Water Resources Comment 70:

A commenter requested specific plans for retention ponds. Another commenter stated that containment systems are needed in the event of a spill that will prevent contamination from reaching stormwater conveyance systems.

Response: See Response to Water Resources Comment 55, which states, in part, that site-specific stormwater modeling and design will be conducted during the permitting for each phase of the Proposed Project. Additionally, secondary containment is required for all tanks that contain hazardous chemicals and most tanks that contain petroleum. The volume of the secondary containment is required to be at least 110% of the volume of the largest tank within it. The SPCC and SPR will include a summary of the tanks and their respective volumes, contents, secondary containment, leak detection, and safety equipment. See FEIS Section 3.8.3.2.

Water Resources Comment 71:

Commenters stated that Micron should design larger stormwater detention ponds and open water portions of mitigation wetlands where space allows to accommodate runoff from larger storm events.

Response: This suggestion will be considered during the final stormwater design. As described in FEIS Section 3.3.4.2, Micron would develop stormwater designs that comply with the New York State Stormwater Management Design Manual and are approved by the NYSDEC and the appropriate local authority. Stormwater retention/detention ponds and infrastructure would be adequately sized to maintain water quality and quantity volumes as compared to pre-construction conditions. Additionally, where feasible, stormwater management practices summarized in FEIS Table 3.3-11 would be implemented to reduce stormwater runoff and enhance resilience to storm events.

Water Resources Comment 72:

Commenters stated that the DEIS should evaluate porous paving surfaces, green roofs, and bioswales to reduce runoff and potential flooding. Micron should commit to green infrastructure best practices when feasible.

Response: The SMPs mentioned in the comment, which include green infrastructure practices to the greatest extent practicable, are being considered and are discussed in FEIS Section 3.3.4.2.

Water Resources Comment 73:

A commenter suggested that stormwater management BMPs be designed to meet the 1,000-year 24-hour event to provide a buffer for large intense storm events.

Response: Stormwater design and permitting will follow NYSDEC requirements at the time of approval.

Water Resources Comment 74:

Commenter suggested amending language to meet design standards approved at the time of construction due to duration of project over the next 20 years.

Response: See Response to Water Resources Comment 64. Stormwater design and permitting will follow NYSDEC requirements at the time of approval.

Water Resources Comment 75:

Concerns were raised that the expanded impermeable surface for parking facilities will increase flood risks.

Response: See Responses to Water Resources Comments 27 and 55.

Water Resources Comment 76:

A commenter stated that the DEIS does not include necessary information to evaluate groundwater and groundwater-surface water interactions, including contour mapping of groundwater and bedrock, geologic cross sections, groundwater potentiometric maps, surface water elevations, or groundwater monitoring well data from wells installed in the productive bedrock.

Response: Micron is proposing the implementation of a Monitoring Plan for surface water, groundwater, and vegetation, that is integral to understanding baseline conditions, thereby enabling analysis of potential hydrologic changes resulting from construction activities and placement of buildings. The findings will help inform the assessment of onsite wetlands and monitoring efforts. The Monitoring Plan is built around data collected from 42 installed groundwater monitoring wells, 15 surface water monitoring stations, and infield vegetative monitoring plots that will be coupled with high resolution imagery. Baseline data is not available yet.

Additionally, with respect to the evaluation, avoidance, and minimization of effects on groundwater and surface water from the Proposed Project, Micron would implement several stormwater BMPs as integral elements of Proposed Project design and operations. Micron also would be required to obtain a SPDES permit from NYSDEC, which would require Micron to implement post-construction SMPs as operating permit conditions. The stormwater BMPs and SMPs would serve to increase infiltration of stormwater runoff from impervious surfaces to promote groundwater recharge, filtration, infiltration, and storage. As part of its SPDES permit,

Micron also would be required to implement SWPPP and SPCC/SPR Plan measures to reduce the risk of accidental releases, leaks, or spills during facility operations and provide for immediate containment and cleanup of any release. SMPs would be adaptively managed and refined over time, as appropriate, based on ongoing water level and flow monitoring performed at 42 groundwater monitoring lls, 15 surface water monitoring points (7 culverts and 8 channel points), and 5 piezometer monitoring wells.

National Grid, OCWA, and OCDWEP would operate their respective Connected Actions in accordance with all applicable SPDES permit requirements, including by implementing any required post-construction SMPs, as well as any required SWPPP and SPC/SPR Plan measures to reduce the risk of spills and provide for immediate containment and cleanup of any release.

Water Resources Comment 77:

Commenters expressed general concerns about the depletion of groundwater generally and resulting from loss of wetlands.

Response: See Response to Water Resources Comment 27 and 76, which discuss BMPs and SMPs to promote infiltration of stormwater runoff to promote groundwater recharge in connection with the Proposed Project and Connected Actions.

As discussed in FEIS Section 3.3.4.2, if required based on the need for construction dewatering activities, Micron will apply for a water withdrawal permit and prepare and implement a dewatering plan.

Water Resources Comment 78:

Commenters expressed concerns or stated that the DEIS did not evaluate the potential for chemicals (e.g., PFAS, heavy metals) to contaminate groundwater in private wells or the two unconsolidated aquifers overlain by the wastewater treatment plant and wastewater conveyance.

Response: The FEIS evaluated the presence of private wells and aquifers, acknowledges the risk of spills from the Proposed Project and Connected Actions, and describes the measures that will be implemented to avoid and minimize potential adverse impacts. Also, FEIS Section 3.8.3.2. and Appendix L-1 discuss federal and state standards for specific PFAS in drinking water. All public drinking water for the area is sourced from surface water resources and is distributed by OCWA. Based on New York State GIS data, only nine private domestic wells are located within one mile of the Micron Campus.

FEIS Appendix F-3.4 states that the IWWTP and wastewater conveyance lines would overlay two unconsolidated aquifers on the western edge of the Shaver Creek watershed, but these are not currently used as public drinking water sources. Pertaining to the IWWTP and conveyances at Oak Orchard, OCDWEP, if required, would obtain SPDES stormwater permit and develop SWPPPs and SPCC/SPR Plans to reduce the risk of accidental releases, leaks, or spills during construction activities and provide instructions for immediate containment and cleanup of any release. See also Responses to Solid Waste and Hazardous Materials Comments 42 and 48.

Discharges of treated wastewater would be to the Oneida River and not to groundwater. See Response to Water Resources Comment 47.

Water Resources Comment 79:

A commenter stated that the DEIS does not address, in any substantive way, the potential for spills, leaks and infiltration from the operations at the Micron facility to contaminate the local groundwater, and for that groundwater to transport contaminants long distances, particularly with the potential for karst features in the subsurface.

Response: See Response to Geology/Soils Comments 1 and 2; Response to Solid Waste and Hazardous Materials Comment 48. The FEIS acknowledges the risk of spills from the Proposed Project and describes the measures that will be implemented to avoid and minimize potential impacts. As part of its SPDES permit from NYSDEC, Micron will be required to implement a SWPPP, as well as SPCC/SPR Plan measures to reduce the risk of accidental releases, leaks, or spills during facility operations and provide for immediate containment and cleanup of any release. Micron will also be subject to various fuel and chemical storage requirements under federal law and the NYSDEC Petroleum and Chemical Bulk Storage and Major Oil Storage Facility (MOSF) Programs.

The SPCC plan will incorporate appropriate bulk storage tank and container registration and licensing, spill prevention, contingency planning, incident reporting, emergency response coordination, and recordkeeping procedures in accordance with Federal and State requirements. Secondary containment is also required for all tanks that contain hazardous chemicals and most tanks that contain petroleum. The volume of the secondary containment is required to be at least 110% of the volume of the largest tank within it. See FEIS Section 3.8.3.2. The SPCC and SPR will include a summary of the tanks and their respective volumes, contents, secondary containment, leak detection, and safety equipment. These and other required measures are expected to avoid and minimize the occurrence and impacts of accidental releases, leaks, or spills.

Water Resources Comment 80:

A commenter stated that the removal of epikarst for construction and replacement of relatively impermeable soils with permeable fill materials without further characterization and engineering measures could cause or exacerbate flooding and contaminant migration.

Response: See Responses to Geology/Soils Comments 1 and 2. As part of the construction design phase, Micron would conduct additional subsurface investigations, including geotechnical borings and groundwater monitoring, to further characterize site conditions. These investigations will inform engineering design decisions aimed to mitigate any potential impacts associated with construction activities. Micron would also use information from the 42 monitoring wells to inform adaptive management measures to avoid and minimize effects from the Proposed Project on groundwater and to refine SMPs designed to maintain existing drainage patterns to the greatest extent practicable, continue the conveyance of upland watershed runoff, control increases in stormwater runoff, prevent soil erosion and sedimentation, and provide runoff reduction.

Water Resources Comment 81:

A commenter stated that a karst survey and hydrogeologic characterization should be performed.

Response: See Response to Geology/Soils Comments 1 and 2. Sections 3.3.3 and 3.3.4.2 and Appendix F of the FEIS provide a description of hydrologic conditions and protective measures for surface and groundwater. Additionally, Micron is proposing the implementation of a Monitoring Plan for surface water, groundwater, and vegetation, that is integral to understanding baseline conditions, thereby enabling analysis of potential hydrologic changes resulting from construction activities and placement of buildings. The findings will help inform the assessment of onsite wetlands and monitoring efforts. The Monitoring Plan is built around data collected from 42 installed groundwater monitoring wells, 15 surface water monitoring stations, and infield vegetative monitoring plots that will be coupled with high resolution imagery.

Water Resources Comment 82:

A commenter stated that the DEIS does not evaluate the potential hydraulic connections between soluble bedrock at the Micron Campus and the Rail Spur Site, the confined aquifer that was identified, or the Baldwinsville Primary Aquifer.

Response: The analysis described in the comment is not necessary for the evaluation of existing groundwater conditions to assess whether the Proposed Project will have a significant effect on groundwater. FEIS Sections 3.3.3 and 3.3.4.2 and Appendix F provide a description of hydrologic conditions and protective measures for surface and groundwater. These measures are also summarized in Responses to Geology/Soils Comment 1, Water Resources Comments 27 and 40, and Solid Waste and Hazardous Materials Comment 48.

Water Resources Comment 83:

Commenters expressed concern about the Proposed Project's impact on drinking water wells in the area. Commenters stated that a private well survey is needed that would identify wells installed prior to NYS well construction reporting requirements. Another commenter stated that the DEIS inaccurately identifies wells on or near the Micron Campus that are actually located in Oswego County.

Response: The FEIS evaluated the presence of groundwater wells and aquifers, and describes the measures that will be implemented to avoid and minimize potential impacts. FEIS Section 3.3.4.2 states that no primary or principal aquifers or SSAs have been identified beneath the Proposed Project portion of the study area, but confined and unconsolidated aquifers exist on the western edge of the Shaver Creek watershed (see Figure F-37). These aquifers are not currently used as public drinking water sources. Instead, all public drinking water for the area is sourced from surface water resources and is distributed by OCWA. In addition, there are only nine private domestic wells within approximately one mile of the WPCP based on publicly available data.

Micron will be required to implement a Monitoring Plan for surface water, groundwater, and vegetation, that is integral to understanding baseline conditions, thereby enabling analysis of

potential hydrologic changes resulting from construction activities and placement of buildings. The findings will help inform the assessment of onsite wetlands and monitoring efforts. The Monitoring Plan is built around data collected from 42 installed groundwater monitoring wells, 15 surface water monitoring stations, and infield vegetative monitoring plots that will be coupled with high resolution imagery. Information gathered from these monitoring wells would be periodically assessed for changes that would warrant alterations to Proposed Project design and construction, as well as to inform adaptive management measures to avoid and minimize effects on groundwater.

As part of its SPDES Construction General Permit and to avoid and minimize potential effects on groundwater, Micron will be required to implement a SWPPP and SPCC/SPR Plan to reduce the risk of accidental releases, leaks, or spills of materials such as concrete, oil, fuel, lubricants, or hydraulic fluids during construction and provide for immediate containment and cleanup of any release. Micron also will be required to obtain a SPDES permit from NYSDEC, which would require Micron to implement post-construction SMPs as operating permit conditions. The stormwater BMPs and SMPs would serve to increase infiltration of stormwater runoff from impervious surfaces to promote groundwater recharge, filtration, infiltration, and storage. As part of its SPDES permit, Micron also will be required to implement SWPPP and SPCC/SPR Plan measures to reduce the risk of accidental releases, leaks, or spills during facility operations and provide for immediate containment and cleanup of any release.

Water well data was obtained through the publicly available NYSDEC GIS database (See FEIS Section 3.3.3.4). Any discrepancies among the well data, in this case identifying wells that are further from the Micron Campus (in Oswego County), would be attributable to inaccuracies in the publicly available dataset.

Water Resources Comment 84:

A commenter identified a well designated OD2031 that is approximately 600 feet from the eastern boundary of the Micron Campus with a high yield exclusively from shallow groundwater. The commenter stated that further study is needed of private wells that use this productive bedrock aquifer.

Response: See Response to Water Resources Comment 83 regarding evaluation of groundwater and wells and protective measures for groundwater. As stated in Section F-3.4 of Appendix F, the NYSDEC Division of Water protects the quality of groundwater used for public drinking water supplies in unconfined aquifers determined to be highly vulnerable to contamination and highly productive for use by public water supply systems by categorizing them as either primary aquifers or principal aquifers. Primary aquifers are those that are highly productive and are utilized as sources of water by major municipal water supply systems; principal aquifers are those that are known to be highly productive or whose geology suggests the potential for an abundant water supply, but which are not intensively used as water supply sources (NYSDEC, 1990). There are no primary or principal aquifers on or adjacent to the Micron Campus, including the area associated with well OD2031.

In addition, of the 42 groundwater monitoring wells installed, several are installed along the eastern boundary of the Micron Campus and are positioned to be representative of groundwater conditions near well OD2031, which lies further to the east. The monitoring of these wells, and

the use of adaptive management strategies, would be used to ensure that current groundwater hydrologic conditions (e.g., depths to groundwater, yields) would not change because of project development. As a result, no private well testing is necessary.

Water Resources Comment 85:

A commenter stated that monitoring well data from existing monitoring wells should be provided.

Response: Micron will be required to implement a Monitoring Plan for surface water, groundwater, and vegetation, that is integral to understanding baseline conditions, thereby enabling analysis of potential hydrologic changes resulting from construction activities and placement of buildings. Information from initial groundwater monitoring events is included in the Monitoring Work Plan that is included as Appendix O to the Clean Water Act Section 404 Joint Permit Application. See also Response to Water Resources Comment 83.

Water Resources Comment 86:

A commenter stated that Micron should disclose when, where, and how long it will dewater the site for construction, which commenter states will lower the groundwater table and potentially drain nearby wetlands, streams, and wells, and how Micron will mitigate impacts.

Response: A plan for de-watering, and the details of same, will be developed on an as-needed basis. As discussed in FEIS Section 3.3.4.2, if required, Micron would obtain a Water Withdrawal permit for dewatering activities related to construction and would develop and implement a dewatering plan. Any dewatering would occur periodically over the entire 16-year construction schedule. Fab construction is phased over time so dewatering will not be consistent over the build out phase period. Micron would implement BMPs and SMPs in connection with its NYSDEC-issued SPDES permits to promote groundwater recharge, filtration, infiltration, and storage. Additionally, based on data obtained from 42 groundwater monitoring wells installed at the Micron Campus, Micron would employ adaptive management strategies, as needed, such as managed aquifer recharge, integrated water resource management, or investing in natural infrastructure to promote groundwater recharge, filtration, infiltration, and storage.

Water Resources Comment 87:

A commenter asked about the impact on wetlands and surface waters from utilities and related transportation projects. Another commenter stated that wetland impacts from Connected Actions must be evaluated before construction begins and tracked over time.

Response: FEIS Sections 3.3.3 and 3.3.4 and Appendices F-3 and F-4 discuss the affected environment and protective measures related to the Connected Actions. Potential effects—such as those to wetlands and surface waters—associated with those Connected Actions will be further reviewed during the permitting process specific to each project. Final jurisdictional determinations have not been made for all Connected Actions at this time given when they are anticipated to move forward. Table 3.3-5 in Section 3.3.3.1 of the EIS currently lists all acreages of Federal, State, and

non-jurisdictional wetlands across the Micron Campus and Connected Actions. These projects cannot proceed until permits are issued.

To minimize indirect effects on remaining wetlands, National Grid, OCWA, and OCDWEP would implement stormwater BMPs similar to those that Micron would implement for the Proposed Project to reduce runoff rates, reduce erosion of disturbed land and downgradient sedimentation, and protect stormwater from contamination before and during Connected Action construction activities.

Future transportation projects will also be subject to similar environmental review and permitting requirements as those described herein.

Water Resources Comment 88:

Commenters were generally concerned about the analysis in the DEIS of water resources, including water quality, ground water, surface water impacts, and wetlands.

Response: The FEIS, which has been reviewed by the federal and state agencies with regulatory authority and expertise in water quality, fully addresses reasonably foreseeable impacts to hydrological resources in Section 3.2 (Geology, Soils, and Topography) and Section 3.3 (Water Resources). These sections evaluate the Proposed Project's potential adverse effects on wetlands, water quality, groundwater, surface water, and ecological communities. Where significant impacts may occur, avoidance and mitigation measures will be required, including BMPs and SMPs. As part of its application for a Clean Water Act (CWA) Section 404 permit from the USACE, and a Freshwater Wetlands permit (ECL Article 24, Title 7) from the NYSDEC, Micron has proposed a compensatory mitigation plan to offset wetland and surface water losses. The permitting process with USACE and NYSDEC, including the development of appropriate mitigation measures, is ongoing and provides another avenue for regulatory oversight by agencies with jurisdiction and expertise in these areas. See also Responses to Water Resources Comments 6, 7, 9, 10, 20, 27, 40, 55, and 76.

Water Resources Comment 89:

Commenters raised general concerns regarding the Project's impact on and removal of wetlands and streams.

Response: The lead agencies acknowledge the concern but note that Micron will be required to implement necessary and appropriate mitigation. See Responses to Water Resources Comments 20, 27, and 55. Section 3.3.3 of the FEIS describes the affected environment for the Proposed Project, including permanent impacts on wetlands and streams. Section 3.3.5 and Appendix F describe Micron's proposed mitigation plan for unavoidable impacts to surface waters and wetlands. As described in the *Off-site Compensatory Mitigation Plan* (FEIS Appendix F-7, Appendix N, Attachment B), and required as a condition of Micron's wetlands permits, Micron will offset impacts to wetlands at a 2.2:1 rate on average. The mitigation rates for each type of wetlands can be found in FEIS Section 3.3.5. Under the Mitigation Plan, Micron will be required to enhance, establish, or restore a total of 422.14 acres of wetlands and restore a total of 14,030 LF of streams through permittee-responsible mitigation at the mitigation sites. The mitigation sites

will be monitored for 15 years following the year of completion to ensure the successful establishment of wetland vegetation and ecological function.

Water Resources Comment 90:

Commenters raised general concerns about the efficacy of the proposed wetland mitigation.

Response: The lead agencies acknowledge the concern but have reviewed the mitigation in coordination with the USACE and NYSDEC and find that it is appropriate. See Responses to Water Resources Comments 6, 7, 9, and 10.

Water Resources Comment 91:

Commenters stated that removal of wetlands is contrary to NYS wetland protection laws and the Clean Water Act.

Response: The removal of wetlands is not prohibited by the federal Clean Water Act (CWA) or the New York State Environmental Conservation Law (ECL). Section 404 of the CWA (33 U.S.C. § 1344) and its attendant regulations prohibit the discharge of dredge or fill materials into Waters of the U.S. without a permit and establish a permitting process that includes mitigation of permanent impacts by permitted projects. Article 24 of the ECL and its attendant regulations establish a similar permitting and mitigation process for regulated activities within state-jurisdictional wetlands.

As part of its application for a CWA Section 404 permit from U.S. Army Corps of Engineers (USACE), and a Freshwater Wetlands permit (ECL Article 24, Title 7) from the New York State Department of Environmental Conservation (NYSDEC), Micron has proposed a compensatory mitigation plan to offset wetland losses. The permitting process with USACE and NYSDEC, including the development of appropriate mitigation measures, is ongoing. The *Off-site Compensatory Mitigation Plan* (FEIS Appendix F-7, Appendix N, Attachment B) will require that Micron enhance, establish, or restore a total of 422.14 acres of wetlands and restore a total of 14,030 LF of streams through permittee-responsible mitigation at the mitigation sites. See also Response to Water Resources Comment 6.

Water Resources Comment 92:

Commenters stated that the DEIS analysis cannot rely on legal compliance or future permitting for the conclusion that impacts are not significant.

Response: The conclusions in the FEIS do not rely solely on legal compliance with applicable law, regulations, and permits for determinations of impact significance. The FEIS reflects a thorough analysis of the affected environment, and where impacts have been identified, the protective measures described therein to avoid, minimize, or mitigate effects. The FEIS, which has been reviewed by the federal and state agencies with regulatory authority and expertise in water quality, fully addresses reasonably foreseeable impacts to hydrological resources in Section 3.2 (Geology, Soils, and Topography) and Section 3.3 (Water Resources). These sections evaluate the Proposed

Project's reasonably foreseeable effects on wetlands, water quality, groundwater, surface water, and ecological communities. Where significant impacts may occur, mitigation measures are proposed.

Additionally, as part of its application for a Clean Water Act (CWA) Section 404 permit from the USACE, and a Freshwater Wetlands permit (ECL Article 24, Title 7) from the NYSDEC, Micron has proposed a compensatory mitigation plan to offset wetland and surface water losses. The permitting process with USACE and NYSDEC, including the development of appropriate mitigation measures, is ongoing and provides another avenue for regulatory oversight by agencies with jurisdiction and expertise in these areas. See also Response to Nation Comment 7.

Water Resources Comment 93

A commenter stated that the recent changes in the wetlands law have added over 1 million acres to the wetlands maps such that development of 200 acres of wetlands is non-consequential.

Response: Comment noted.

Water Resources Comment 94:

Commenters stated that the DEIS does not provide details regarding alternative building and roadway layouts to avoid impacts to water resources. A commenter suggested building no more than 3 fabs.

Response: See Response to Project Description/Alternatives Comment 1. See also Response to Water Resources Comment 5 regarding the Micron Campus layout and avoidance of wetlands. Additionally, the Section 404(b)(1) analysis included as a component of the JPA provides a detailed assessment in Section 3.3 of the various alternatives that Micron considered and the rationale for why the 4-fab alternative was selected.

The JPA states that Micron compressed the construction footprint to avoid substantial development in the more extensive wetland complex areas within and north of the National Grid transmission right-of-way. Micron also designed the Micron Campus to avoid impacts to perennial streams.

Water Resources Comment 95:

A commenter stated that a salt reduction strategy should be included in the DEIS-proposed water quality monitoring program and water quality monitoring data should be publicly available. Concerns were expressed about the impacts on water resources from the increased salt usage on roads and parking lots as a result of the Project.

Response: Micron will be required to implement BMPs and post-construction SMPs as a condition of its SPDES permit, which would be designed to accommodate, slow, and hold stormwater runoff and to filter out the pollutants (e.g., salt) it would carry from the impervious surfaces. Also, NYSDEC jurisdictional wetlands are given a 100' protective buffer, which helps protect wetlands from runoff and allows for the filtration of pollutants.

Water Resources Comment 96:

A commenter stated that Micron should commit to a review process that would incorporate a partnership similar to that for the Onondaga Lake cleanup.

Response: The Onondaga Lake cleanup, which concerned the cleanup of a Superfund site, is not comparable. The Proposed Project is subject to agency and public review and scrutiny through the NEPA and SEQRA processes, as well as permit applications before the resource agencies. Micron has committed to transparency and regulatory compliance throughout the environmental review, construction, and operations.

Water Resources Comment 97:

A commenter asked whether the County will impose limits on chemicals not regulated by the state or federal government.

Response: Any decision by the County to regulate chemicals within the County is in the discretion of the Onondaga County Legislature and not within the scope of environmental review.

Water Resources Comment 98:

A commenter asked whether Micron is exempt from liability for chemical emissions.

Response: Micron will be subject to and is required to comply with all applicable federal, state, and local regulations. FEIS Section 1.4, Table 1.4-1 identifies the major permits, approvals, and consultations required for the Proposed Project.

Water Resources Comment 99:

A commenter asked whether the Proposed Project will impact international waters.

Response: See Response to Water Resources Comment 40 and 47.

Water Resources Comment 100:

Section 5.1 Water Resources – Unfortunately, large projects such as this invariably severely impact valuable water and other resources, often by paving them over. Historically, these resources were lost forever. However, laws and regulations over the past half-century have required mitigation of these impacts. Large projects like this require large mitigations which create opportunities for large contiguous area mitigations that are simply not possible for small projects. Mitigations in Appendix F are generally large contiguous areas for either permanent protection or construction of mitigation features.

Response: Comment noted.

Water Resources Comment 101:

The DEIS fails to adequately assess the cumulative and downstream impacts of filling streams. Micron should conduct a comprehensive assessment of the cumulative and downstream impacts of filling ephemeral and intermittent streams, and ensure their protection through first avoidance, second minimization, and only then robust mitigation measures.

Response: The FEIS addresses cumulative effects to the extent they are reasonably foreseeable in Section 4.3.3. All projects in which rivers and streams would be impacted would require applicable Federal and State permitting (e.g., CWA Section 404, Rivers and Harbors Act Section 10, and state Article 15 permitting) to ensure protection of surface water features. Permit applications would require the development and implementation of plans to avoid impacts to rivers and streams whenever and wherever possible and the implementation of SMPs, BMPs (e.g., using horizontal directional drilling, silt fences, compost filter socks, timber mats), erosion and sediment control, stormwater pollution prevention, and/or spill prevention control, as necessary to minimize impacts on remaining surface water features and water quality conditions. All regulated stream channel losses would be subject to mitigation as required by the CWA. Compliance with these relevant laws and regulations would reduce the potential for cumulative impacts on remaining surface water features and water quality conditions within the analysis area to the maximum extent practicable.

The Wetlands Assessment and Monitoring Plan (Wetlands Assessment and Monitoring Plan (Appendix O to the Micron JPA application) describes a long-term monitoring program implemented by Micron to assess groundwater and surface water (including at locations downstream of Micron in Youngs Creek) to verify that construction and operational activities have not impacted onsite or downstream wetlands and surface waters and to inform any necessary adaptive management measures. For the Micron Campus, avoidance and minimization efforts were employed to limit onsite impacts to only those which were unavoidable. Additionally, 14,030 linear feet of streams are being restored/created as part of the offsite mitigation process. See Responses to Water Resources Comments 20, 27, 55, and 89 regarding surface water avoidance and mitigation.

Water Resources Comment 102:

Sufficient information has not been provided to take a hard look at cumulative flooding impacts and make a reasoned judgement justifying that the proposed stormwater management and wetland restoration is enough mitigation to address all of these impacts and claim no significant adverse effects.

Response: See Responses to Water Resources Comments 6, 7, 9, 10, 20, and 27. As noted in Section 4.4.3 of the FEIS, cumulative impacts to floodplains resulting from changes in stormwater flows—both from the Proposed Action and other developments within floodplain boundaries—cannot be reasonably quantified or predicted. This is due to the wide variability and uncertainty in project-specific conditions associated with each individual action. While cumulative changes in stormwater flows have the potential to significantly affect floodplains within the relevant hydrologic system, existing local, state, and federal regulations and permitting requirements are

designed to prevent and minimize direct impacts from development within floodplain areas, as well as downstream stormwater effects.

Stormwater design and permitting for each phase of the project will comply with current NYSDEC requirements at the time of permit submittal. Stormwater Management Practices (SMPs) will be implemented to preserve existing drainage patterns to the extent practicable, maintain upland watershed runoff conveyance, control increases in stormwater volume, prevent soil erosion and sedimentation, and reduce runoff through the use of green infrastructure where feasible. Additionally, wet extended detention ponds and bioretention filtration areas will help mitigate downstream flood risks by reducing stormwater runoff volumes. These measures also contribute to water quality protection by maintaining the integrity of stormwater systems. Additionally, the Final SWPPP for the Micron Campus will identify additional measures, if any, to address upstream and downstream flooding per the requirements of the Climate Risk and Resiliency Act.

A detailed discussion of the SMPs and the overall stormwater management strategy is provided in Section 3.3.4.2 and Appendix F of the FEIS.

3.4 Biological Resources

Biological Resources Comment 1:

A commenter suggests that the Record of Decision be delayed until formal consultation with US Fish and Wildlife Service is completed, and the Biological Opinion is made public and that approval of the Proposed Project should be denied if the Biological Opinion finds likely jeopardy. Another commenter stated that the Final EIS needs to discuss whether construction will be delayed until consultation is completed.

Response: Formal consultation with USFWS concluded on October 6, 2025. It is anticipated that the Biological Opinion will be issued before the Record of Decision. Assuming all other approvals are secured, no delays to construction are anticipated. The lead agencies will take all relevant environmental information into account when deciding whether to take action on the Proposed Project, which will be reflected in their decisional documents.

Biological Resources Comment 2:

A commenter stated that the DEIS catalogues the protected and endangered species affected by the loss of wetlands; however, no inventory or census is provided for other native plant and animal species, and how those will be preserved and protected. Is it Micron's position that only legally protected species are to be considered?

Response: All non-listed species were analyzed collectively in taxonomic groups of birds, mammals, reptiles, and amphibians. While regulatory frameworks prioritize legally protected species, Micron's proposed mitigation approach is designed to support broader biodiversity and ecosystem health. Micron has developed comprehensive Mitigation Plans to address the loss of wetlands and surface waters (FEIS Appendix F), as well as the associated biological communities (FEIS Appendix G). These plans are designed to comply with all applicable regulations under the Clean Water Act, the Endangered Species Act, and Articles 11 and 24 of the Environmental

Conservation Law, ensuring that both federal and State jurisdictional wetlands, surface waters, and wildlife resources are appropriately protected and impacts are avoided, minimized, or mitigated.

In response to concerns about the protection of native species beyond those with legal status, it is important to note that while the Biological Assessment (FEIS Appendix G-4) focuses on federally protected species—such as the Indiana bat—the mitigation measures developed for these species, and for other state-protected species, are expected to benefit a broader range of flora and fauna. For example, the purchase and permanent protection of at least 1,182 acres of off-site bat roosting habitat and 650 acres of grassland bird habitat will support many other species that inhabit or could inhabit these ecosystems.

Appendix G-3 of the FEIS provides a detailed inventory of biological resources, including observed plant species and terrestrial and avian wildlife, as well as species with the potential to occur on-site. While the FEIS emphasizes species with protected status due to regulatory requirements, the broader ecological benefits of the mitigation strategy—such as restoring 14,030 linear feet of stream channel and over 400 acres of various wetland types—will enhance habitat quality for a wide array of other native species. Additionally, Micron would implement numerous BMPs to minimize the effects of the Proposed Project on all biological resources (see FEIS Section 3.4.5.1).

Biological Resources Comment 3:

A commenter stated that additional study / bioassay should be conducted along the Oneida River for four miles starting at the Peter Scott Swamp to establish an ecological baseline.

Response: Comprehensive assessments have been conducted, including delineations of wetlands and aquatic resources, and Best Management Practices (BMPs) are in place to minimize biological impacts, as outlined in FEIS Sections 3.4.5.1 and 3.4.5.2. Regulatory agencies such as the U.S. Army Corps of Engineers, U.S. Fish and Wildlife Service, and the New York State Department of Environmental Conservation have concurred with the findings. During the permitting process, regulatory agencies establish effluent discharge limits designed to protect public health, public enjoyment of the resource, protection and propagation of fish and wildlife, and industrial development in the state. SPDES permits require that effluent samples be collected regularly and analyzed by certified laboratories. The results of these analyses are then routinely submitted to NYSDEC to demonstrate compliance with permit conditions. No further studies are warranted. See also Response to Water Resources Comment 40 with respect to discharges into the Oneida River.

Furthermore, establishing an ecological baseline for Peter Scott Swamp would not yield useful data for evaluating potential impacts of the Micron Campus on that location because the Peter Scott Swamp lies downstream of many possible discharge points, which would make it inherently difficult to identify the specific cause of any contamination identified in a bioassay.

Biological Resources Comment 4:

A commenter stated that further study of the potential impacts of the Proposed Project discharges on rare or state-listed avian species and fish stocks in Oswego County is needed.

Response: No additional studies are warranted. See Response to Oswego County Comment 10. See also Response to Biological Resources Comment 26 and Response to Water Resources Comment 47, regarding the limited area of effect in the Oneida River from wastewater discharges. The FEIS acknowledges potential impacts to migratory waterfowl, rare or state-listed avian species, and fish stocks. FEIS Sections 3.4.5.1 and 3.4.5.2 outline BMPs and mitigation measures to protect wildlife, including avian species. See FEIS Table 3.4-12.

Consultation is ongoing with regulatory agencies and regional stakeholders to ensure that sensitive ecological resources—including migratory birds and aquatic species—are considered and protected throughout the development process. Should future studies or coordination with Oswego County identify additional concerns, Micron is open to evaluating further mitigation measures to ensure regional ecological integrity is maintained.

Biological Resources Comment 5:

The DEIS acknowledges that adaptation of relocated protected and endangered species to scattered-site wetlands will happen slowly. Why wasn't consideration given to the impact of relocation of these species to a consolidated site, or a consideration of what larger alternative sites might be available?

Response: See Response to Biological Resources Comment 2. Mitigation site selection is a complex process that considers proximity to project, availability, suitability, and size, depending on the mitigation required and species needs. The largest possible sites that meet these needs were considered by the USACE and NYSDEC, and in consultation with the USFWS, and often multiple property parcels were acquired to create a consolidated mitigation parcel. See also Response to Water Resources Comment 6.

Biological Resources Comment 6:

Commenters were generally concerned about the loss of biodiversity and impacts to species (including reptiles and amphibians) from noise, light, vibrations and changes in water quality caused by the Proposed Project.

Response: See Response to Biological Resources Comment 2. Micron will be required to implement its Mitigation Plans to address the loss of wetlands and surface waters (FEIS Appendix F), as well as the associated biological communities (FEIS Sections 3.4.5.1 and 3.4.5.2 and Appendix G).

All non-listed species were analyzed collectively in taxonomic groups of birds, mammals, reptiles, and amphibians, and biological resource impacts would be mitigated in consultation with

USACE/USFWS and NYSDEC. FEIS Section 3.4.5.1 describes the BMPs Micron will be required to implement to minimize impacts to biological resources. These include, but are not limited to, retention of onsite habitat, planting native species where feasible, noise mitigation measures, minimization of light spillage from nighttime exterior lighting, avoidance of dyes, pesticides, or fertilizers near wetlands or surface waters, wintertime tree clearing, tree marking, retention of onsite roosting and foraging habitat where feasible, and limited nighttime construction. See FEIS Section 3.4.5.1, Table 3.4-12.

Additionally, Table 3.3-12 in Section 3.3.5 of the FEIS discusses, “BMPs for the Protection of Water Resources,” which will protect aquatic habitat for reptiles and amphibians. These include the following: groundwater monitoring; increasing and maximizing water recycling; managing, controlling, and monitoring wastewater flows; and implementing and maintaining BMPs identified in the applicable SWPPP and SPCC/SPR Plan.

Biological Resources Comment 7:

Commenters were generally concerned about impacts to the endangered species that reside on the Proposed Project site. A commenter added that construction workers should be educated about threatened and endangered species.

Response: The *Off-site Compensatory Mitigation Plan* (FEIS Appendix F-7, Appendix N, Attachment B), implemented through The Wetland Trust, Inc., will permanently conserve approximately 1,340 acres across six sites within the Oneida River watershed as mitigation for significant adverse impacts at the Micron Campus. These efforts are designed not only to meet regulatory obligations but also to support long-term ecological integrity. The protected areas will be maintained and monitored in coordination with USFWS and NYSDEC, ensuring that both legally protected and other native species benefit from restored and preserved habitats.

Micron will be required to implement its Mitigation Plans to address impacts to biological communities located on the Micron Campus, as detailed in Appendix G of the FEIS. All biological resource impacts will be minimized in consultation with the USFWS and NYSDEC. FEIS Section 3.4.5.1 outlines the BMPs that will be implemented to minimize impacts to threatened and endangered (T&E) species. These include wintertime tree clearing, tree marking, retention of on-site roosting and foraging habitat where feasible, and limiting nighttime construction activities. Micron would also employ a biological monitor to oversee implementation of BMPs and other measures intended to minimize effects on biological resources.

Appendix G-4 of the FEIS contains the Biological Assessment, which further details avoidance, minimization and mitigation measures developed in coordination with USFWS and NYSDEC. These include:

- Permanent off-site habitat protection through conservation easements managed by The Wetland Trust, Inc.

- Installation of artificial roost sites following guidance from the Wildlife Conservation Society Canada, and of appropriate styles and designs selected by USFWS and NYSDEC for Indiana, northern long-eared, and tricolored bats in undisturbed portions of the Micron Campus.
- Sponsorship of four research and monitoring projects designed in consultation with USFWS and NYSDEC.
- Funding a grant program administered by a non-governmental conservation organization or university to support conservation of the Indiana bat, northern long-eared bat, and tricolored bat, and to help offset cumulative impacts from regional economic growth.
- Financial contributions toward the fabrication and installation of gates to protect the Glen Park bat hibernaculum or another site selected by USFWS and NYSDEC.

To mitigate unavoidable significant adverse effects, NYSDEC would require that either three acres of new or improved habitat be protected for every acre lost due to Proposed Project construction, or one acre of new or improved habitat be protected for every one acre lost along with a commitment to manage that habitat in a grassland state for 15 years. As described in the Net Conservation Benefit Plan this mitigation would be carried out within 5-year cycles. Micron and The Wetland Trust, Inc., a 501(c)(3) nonprofit organization, have proposed to purchase 650 acres of sufficiently high-quality habitat for permanent protection and to restore and manage the habitat as grassland for 15 years (in 3-year cycles) to achieve the required net conservation benefit.

In response to concerns about construction worker awareness, Micron will be required to educate all construction personnel working on the site about the presence of T&E species and the importance of compliance with mitigation measures. Worker training programs will include information on species identification, habitat sensitivity, and protocols for avoiding and reporting potential impacts.

The measures identified in the FEIS and committed to by Micron will protect both legally protected species and the broader ecological integrity of the project area.

Biological Resources Comment 8:

Commenters stated that the DEIS does not adequately address the mass mortality of animals due to construction or mitigation measures.

Response: See Responses to Biological Resources Comments 2, 6 and 7. In response to concerns about mass mortality of animals due to construction or mitigation activities, Micron will be required to implement BMPs to help minimize the effects of the Proposed Project on biological resources, which are summarized in FEIS Table 3.4-12. These measures are designed to avoid direct harm to wildlife during sensitive periods and to preserve critical habitat features. These BMPs are discussed in Section 3.4.5.1 of the FEIS and include the following:

- Retention of on-site roosting and foraging habitat where feasible.

- Implementation of a Landscape Management Plan (LMP) on the Micron Campus and Childcare Site using native plant species where feasible.
- Noise reduction and mitigation measures such as sound attenuators and acoustical louvers to reduce noises generated by outdoor equipment.
- Lighting reduction measures to minimize light spillage.
- Water quality protection including avoiding the use of dyes, pesticides and fertilizers near any wetlands and surface waters.
- Employment of a biological monitor to oversee implementation of BMPs.

In addition to BMPs, Micron's required biological, wetland, and surface water mitigation will offset unavoidable significant adverse effects on biological resources, including from construction activities. As discussed in FEIS Section 3.4.5.2, Micron's mitigation efforts are designed not only to meet regulatory obligations but also to support long-term ecological integrity. See FEIS Appendix G; Off-site Compensatory Mitigation Plan (FEIS Appendix F-7, Appendix N, Attachment B).

Biological Resources Comment 9:

Commenters were generally concerned about impacts on habitat connectivity and fragmentation and avoiding and preserving existing natural habitats.

Response: A detailed alternatives analysis is provided in Section 2.2 of the FEIS. While the Preferred and No-Build Alternatives were evaluated in terms of environmental impacts, other alternatives were not carried forward because they did not meet CPO's purpose and need under NEPA, Micron's purpose and need under SEQRA, or the technical and economic feasibility of the project. See Response to Purpose and Public Need Comment 2; Project Description/Alternatives Comment 6.

Notwithstanding, the Proposed Project incorporates design and mitigation strategies intended to reduce impacts on habitat connectivity. These include maintaining and enhancing buffer zones, implementing a Landscape Management Plan using native species where feasible, preserving key habitat corridors where feasible, and implementing off-site conservation measures to support regional ecological integrity. These efforts are intended to balance project feasibility with environmental stewardship and address concerns raised by commenters regarding the protection of natural habitats. See FEIS Sections 3.4.5.1, 3.4.5.2 and Table 3.4-8.

Biological Resources Comment 10:

A commenter stated that the Proposed Project will eliminate potential habitat for American Hart's-Tongue Fern and Bog Turtle even if individuals are not currently present.

Response: See Response to Biological Resources 2, 6, 7, and 9. The FEIS considers only the habitat of species that is impacted by the Proposed Project. Though the species identified in the comment do not occur in the area that would be affected by the Proposed Project, measures such as off-site conservation easements, habitat restoration, and long-term monitoring are designed to preserve

and enhance suitable habitat conditions for a wide range of species, including potentially those identified in the comment. See also FEIS Sections 3.4.5.1 and 3.4.5.2.

Biological Resources Comment 11:

Commenters were generally concerned about potential impacts of the Proposed Project on existing habitat and ecological communities and dominant vegetation communities, including successional old fields, floodplain forests, shrublands, marshes, and red maple-hardwood swamps, which provide habitat and ecological services.

Response: See Responses to Biological Resources 2, 6, and 9. FEIS Section 3.4.3.1 describes the affected environment and biological resource types present on the Proposed Project site. Table 3.4-1 provides a detailed inventory of existing ecological communities and dominant vegetation. Anticipated impacts to these communities are discussed in Section 3.4.4, with Table 3.4-6 outlining the current extent of each community, the area expected to be impacted by each project component (Micron Campus, Rail Spur Site, and Childcare Site), and the areas that would remain post-construction.

Additional tables provide further detail: Table 3.4-7 breaks down affected areas by construction stage on the Micron Campus; Table 3.4-8 outlines proposed impact minimization measures, including preservation of habitat patches, buffer zones, and restoration efforts.

The measures identified in the FEIS and committed to by Micron, including required mitigation, are designed to reduce habitat fragmentation and preserve ecological function where feasible, in alignment with state and federal environmental regulations. These efforts include BMPs and other mitigation measures in Sections 3.4.5.1 and 3.4.5.2 such as the protection of at least 1,182 acres of bat roosting habitat (in addition to the 272 undisturbed acres on the Micron Campus) and 650 acres of grassland bird habitat, as well as protection and mitigation measures described for water resources in Section 3.3 of the FEIS.

Biological Resources Comment 12:

Commenters were generally concerned about the project and that the growth associated with the project will displace or eliminate wildlife and greenspace.

Response: See Response to Biological Resources Comments 6, 7, 9, and 11. The measures identified in the FEIS and committed to by Micron would minimize the displacement of wildlife and loss of greenspace through a combination of on-site impact avoidance, off-site habitat conservation, and long-term ecological stewardship. Mitigation Plans to address the loss of wetlands, surface waters, and associated biological communities, are detailed in Appendix F and Appendix G of the FEIS. All biological resource impacts will be mitigated in consultation with the USFWS and NYSDEC.

To address concerns about broader ecological impacts and greenspace loss, an Off-site Compensatory Mitigation Plan (FEIS Attachment F-7, Appendix N, Attachment B), will be implemented through The Wetland Trust, Inc., which will permanently secure and protect

approximately 1,340 acres of upland and aquatic resources across six wetland mitigation sites within the Oneida River watershed. This plan includes:

- Restoration of 14,030 linear feet of stream channel,
- Re-establishment/restoration of over 390 acres of wetland types (emergent marsh, scrub-shrub, and forested),
- Rehabilitation of 113.9 acres of existing wetland and preservation of 96.5 acres of existing wetlands, and
- Protection of approximately 380 acres of buffer habitat.

These mitigation efforts are designed not only to comply with the Clean Water Act and Article 24 of the Environmental Conservation Law, but also to preserve ecological function and support regional biodiversity. FEIS Table 3.3-12 in Section 3.3.5 outlines additional BMPs for water resource protection, including groundwater monitoring, maximizing water recycling, managing wastewater flows, and implementing stormwater and spill prevention plans.

Biological Resources Comment 13:

Appendix F-7 Compensatory Mitigation Plan - Considering that many of the large contiguous areas requiring mitigation within the Micron site are impacted by invasive species, this project provides a rare opportunity to generate high quality large contiguous areas focused on specific wildlife species that are generally not accommodated by smaller mitigations. In particular, grasslands in this region tend to undergo succession to woodlands in the absence of a wildfire cycle. Maintaining some areas as large contiguous grasslands (>50 acres in size) and preventing woodland succession will be valuable for species that require large grassland plots to maintain breeding populations.

Response: See Responses to Biological Resources Comments 2, 5, 7, and 12. As outlined in Appendix F-7-1, Section 3.2 Mitigation Area Selection, mitigation site selection is a complex process that considers proximity to project, availability, suitability, and size, depending on the mitigation required and species need. The largest possible sites that meet these needs were considered by the USACE and NYSDEC, and often multiple property parcels were acquired to create a consolidated mitigation parcel.

To meet NYSDEC mitigation requirements for the state-listed short-eared owl and northern harrier, the offsite grassland parcels that have been approved by NYSDEC, acquired, and will soon be placed in conservation easements, will be managed (i.e., mowed) on a 3-year rotation for 15 years to maintain them in a grassland state.

Biological Resources Comment 14:

Commenters generally were concerned about impacts on Indiana bat, Long-eared bat, tri-colored bat, and other bat species. One commenter suggested placing bat boxes on site.

Response: As outlined in FEIS Section 3.4.4.2, Indiana bat, northern long-eared bat, and tri-colored bat, are all documented at the Micron Campus site. To avoid direct take of these bats, all proposed tree clearing would only occur within the winter hibernation window from November 1 through March 31. To minimize impacts to bats, FEIS Section 3.4.5.1 outlines BMPs, that will be required of Micron, such as wintertime tree clearing, tree marking, retention of on-site roosting and foraging habitat where feasible, and limited nighttime construction. FEIS Section 3.4.5.2 and the Biological Assessment (Appendix G-4) further describe targeted mitigation measures for bat species. See also Response to Biological Resources Comment 7.

The off-site bat roosting habitat will be protected at a 2:1 ratio, resulting in the conservation of a minimum of approximately 1,182 acres, in addition to 272 undisturbed acres of roosting habitat that will remain protected on-site.

Micron will also fund the purchase and installation of 10 roost boxes of appropriate styles and designs selected by USFWS and NYSDEC for Indiana, northern long-eared, and tricolored bats in undisturbed portions of the Micron Campus. The boxes will be installed prior to the completion of Fab 1. Occupancy of the boxes will be monitored once per maternity season for the first five years following their installation, along with annual cleaning and maintenance procedures that follow manufacturer recommendations and best management practices as noted in FEIS Section 3.4.5.2 and Appendix G-4.

Biological Resources Comment 15:

A commenter stated that the DEIS draws on limited and geographically inconsistent research in the analysis of noise sensitivity in bats that may not accurately reflect the needs of endangered species in New York.

Response: Section 5.2 of Appendix G of the FEIS provides a detailed overview of the current scientific understanding of noise sensitivity in bats, drawing primarily from peer-reviewed studies and articles focused on North American species, including the Indiana bat, northern long-eared bat, and tri-colored bat. These species are of particular relevance to the Proposed Project and its geographic context in New York State. The section also includes analysis of anticipated noise levels from both construction and operational phases of the project, with specific attention to road noise, which is pertinent to other species. The FEIS prioritizes studies most applicable to the species and environmental conditions present in the project area.

Biological Resources Comment 16:

A commenter stated that the DEIS does not define seasonal clearing restrictions, tree survey protocols, bat presence verification, a Habitat Conservation Plan, or Section 7 consultation results despite the presence of potential summer roosting habitat.

Response: See Response to Biological Resources Comment 14. The Draft Biological Assessment (BA), included in the DEIS as Appendix G-4, has been finalized, and is included as Appendix G-4 of the FEIS. As outlined in FEIS Section 3.4.2, USFWS' Biological Opinion (BO) (see Appendix G-4) will be included in the Record of Decision and will address the potential incidental take of

federally listed species associated with the Proposed Project and include reasonable and prudent measures necessary or appropriate to minimize the impacts of any incidental take. A draft Habitat Conservation Plan (HCP) was submitted by The Wetland Trust, Inc. to USFWS in August 2025 for review.

While the final results of the Section 7 consultation are pending, FEIS Section 3.4.5.1 outlines several mitigation strategies and protocols to protect bat species and their habitats. FEIS Section 3.4.5.2 and Appendix G-4 further detail mitigation measures developed in coordination with USFWS and NYSDEC, including off-site habitat protection, artificial roost site installation, acoustic bat monitoring, and funding for conservation research and habitat protection.

Biological Resources Comment 17:

Commenters expressed concerns regarding the unavoidable adverse effects from construction-related habitat destruction and lighting on Indiana and northern long-eared bats, both federally listed species, which will disrupt foraging and roosting.

Response: See Response to Biological Resources Comment 14. The FEIS acknowledges concerns regarding unavoidable adverse effects from construction activities and lighting on bat species, particularly the federally listed Indiana bat and northern long-eared bat. To address these concerns, Micron has committed to Mitigation Plans, as outlined in Appendix F and Appendix G of the FEIS, to minimize and offset impacts.

All biological resource impacts will be mitigated in accordance with consultation with the USFWS and the Endangered Species Act (ESA). Section 3.4.5.1 of the FEIS describes BMPs to reduce impacts to threatened and endangered species, including retention of onsite roosting and foraging habitat (380 acres that includes approximately 272 acres of nearly contiguous forested roosting and foraging habitat) and use of lighting that minimizes light spillage or trespass beyond intended areas of illumination.

Section 5.3 of Appendix G-4 also specifically addresses the potential effects of lighting on bats. The FEIS notes that all construction and operational lighting on the Micron Campus will strive to meet the U.S. Green Building Council's LEED light pollution reduction credit (SS6) for LZ1 land-use zones. Lighting will be designed to minimize backlight, uplight, and glare, consistent with the Illuminating Engineering Society's BUG rating system and the Town of Clay's lighting code (§140). Construction lighting will be limited to active work areas—unsuitable for bats—and will be directed inward to minimize light trespass into adjacent areas. Construction will end by 10 p.m., further limiting nighttime lighting exposure.

The Biological Assessment (Appendix G-4) assumes light-averse behavior for the Indiana bat, northern long-eared bat, and tri-colored bat, and evaluates lighting impacts accordingly. Additional mitigation measures are described in FEIS Section 3.4.5.2 and include:

- Off-site habitat protection at a 2:1 ratio, conserving a minimum of approximately 1,182 acres of bat roosting habitat,
- Artificial roost site installation following best practices,
- Research and monitoring projects developed in consultation with USFWS and NYSDEC,

- Micron-funded conservation grant program to support long-term bat conservation,
- Gating of hibernacula to prevent human disturbance, and
- Acoustic bat monitoring to track species activity and presence.

These measures are designed to minimize disruption to bat foraging and roosting behavior and to support long-term conservation of bat populations in the region.

Biological Resources Comment 18:

A commenter stated that more mitigation for bats is needed such as the construction of roosting sites nearby. Another commenter stated that the effectiveness of artificial roosts should be further examined before implementation.

Response: See Response to Biological Resources Comment 14. As described in Table 3.4-13 of Section 3.4 of the FEIS, Micron would fund the purchase and installation of 10 artificial roost boxes designed specifically for Indiana bat, northern long-eared bat, and tri-colored bat. These boxes would be placed in undisturbed portions of the Micron Campus and monitored once per maternity season for five years following installation to assess occupancy and effectiveness.

The design and placement of these roost boxes will follow best practices outlined by the USFWS and guidance from the Wildlife Conservation Society Canada, with a focus on providing suitable summer habitat. Micron would evaluate the performance of these artificial roosts and adjusting strategies as needed based on monitoring results and consultation with the USFWS and NYSDEC.

Biological Resources Comment 19:

A commenter questioned whether bats will successfully find other roosting sites given roosting fidelity and the likelihood that bats will return to their original roost sites.

Response: See Response to Biological Resources Comment 14 regarding the installation of roost boxes and other mitigation measures. While roosting fidelity is a known trait among bat species, the preservation of undisturbed habitat and implementation of targeted mitigation measures are intended to reduce disruption and support long-term habitat continuity. Micron will be required to continue to work closely with USFWS and NYSDEC to ensure that mitigation strategies are responsive to species-specific behaviors and ecological needs.

As described in FEIS Section 3.4.5.1, Micron will be required to implement BMPs to help minimize effects on biological resources, including bats. One BMP outlined is the retention of on-site roosting and foraging habitat. As stated in FEIS Table 3.4-12, “the Micron Campus site plan has been designed to economize space and reduce the manufacturing facility LOD to the maximum extent practicable. Based on the site plan, construction of the campus would leave approximately 380 acres on the site undisturbed, including approximately 272 nearly contiguous acres of forested roosting habitat, approximately 84 acres of former cropland shrubland), and approximately 11 acres of non-forested wetlands. These avoidance measures will reduce the scale of habitat loss from the Proposed Project and preserve some suitable on-site roosting and foraging habitat for Indiana bats, northern long-eared bats, and tricolored bats, which would also be connected to adjacent habitat areas off-site.” The 272 acres of undisturbed roosting habitat on-site are protected

for bats through permanent conservation easements and are intended to support the continued presence of bat populations and facilitate their return to existing roost sites.

Outside of BMPs, Micron is also required to implement Mitigation Plans, as outlined in FEIS Appendix F and Appendix G, to minimize and offset impacts. The Mitigation Plans also include off-site habitat protection, artificial roost installation, acoustic monitoring, and other measures designed to support bat behavior and habitat use.

Further, as described in Section 3.4.2 of the FEIS, the Draft Biological Assessment (BA), included as Appendix G-4 in the DEIS, has been finalized, and is included as FEIS Appendix G-4. USFWS's Biological Opinion (BO) will be included in the Record of Decision and will address the potential incidental take of federally listed species, including the Indiana bat and northern long-eared bat, and include reasonable and prudent measures necessary or appropriate to minimize the impacts of any incidental take. See FEIS Section 3.4.2. A draft Habitat Conservation Plan has been submitted to USFWS for review and a detailed mitigation plan is being developed as part of this ongoing consultation.

Biological Resources Comment 20:

A commenter stated that the DEIS lacks detail regarding Micron's proposed mitigation for bats and grassland birds, including the company's "mitigation masterplan," and the likely effectiveness of mitigation that considers the quality and availability of habitat (e.g., maternity roost trees).

Response: See Responses to Biological Resources Comments 6, 14, 16, 19, and 22.

Biological Resources Comment 21:

A commenter stated that the Project will result in the removal of bats from the local area which help to reduce the infectious mosquito population.

Response: See Responses to Biological Resources Comments 6, 14, 16, and 19. Micron would implement BMPs to minimize impacts to bat populations, as well as a comprehensive suite of measures aimed at preserving and enhancing bat habitat both on-site and off-site. Key mitigation actions include:

- Off-site habitat protection at a 2:1 ratio, conserving a minimum of approximately 1,182 acres of bat roosting habitat through permanent conservation easements.
- On-site preservation of 272 acres of undisturbed roosting habitat to support continued bat presence within the project area.
- Installation of artificial roost sites designed according to best practices to provide alternative summer habitat for species such as the Indiana bat, northern long-eared bat, and tri-colored bat.
- Research and monitoring projects developed in consultation with USFWS and NYSDEC to evaluate bat activity, habitat use, and the effectiveness of mitigation measures.
- Micron-funded conservation grant program to support long-term bat conservation and offset cumulative regional impacts.

- Gating of hibernacula to prevent human disturbance at critical overwintering sites.
- Acoustic bat monitoring to track species presence and behavior over time.

These measures are designed not only to comply with federal and state regulations but also to support the ecological functions bats provide, including natural pest control.

Biological Resources Comment 22:

Commenters were generally concerned about impacts to avian species, including endangered species, grassland birds and species of greatest conservation need (e.g., Eastern Meadowlark, Brown Thrasher, Bobolink, Sedge Wren) and their habitat.

Response: See Response to Biological Resources Comment 2. In addition to the BMPs summarized in Section 3.4.5.1 of the FEIS, Section 3.4.5.2 describes mandatory mitigation measures Micron would implement that provide a net conservation benefit, specifically for identified grassland bird species and their habitats.

To offset the adverse impact due to loss of grassland habitat from construction of the Proposed Project, the NYSDEC requires that either three acres of new or improved habitat be protected for every acre lost, or one acre of new or improved habitat be protected for every one acre lost along with a commitment to manage that habitat in a grassland state for 15 years. In response, Micron, in partnership with The Wetland Trust, Inc., a 501(c)(3) nonprofit organization, has proposed the permanent protection and 15-year management of approximately 650 acres of high-quality grassland habitat. These lands will be restored and maintained as grassland for a minimum of 15 years, in three-year management cycles, across seven properties located in Oswego, Chenango, Yates, Cortland, Broome, Tompkins, and Tioga Counties—ranging from 10 to 60 miles from the Micron Campus. Each restored field will exceed 25 contiguous acres to ensure ecological viability.

A final Grassland Protection Plan will be developed in coordination with NYSDEC and will be subject to agency review and approval. This plan will incorporate technologically, economically, and biologically practicable measures to support listed grassland birds, including northern harriers and short-eared owls, while also benefiting a broader range of avian species such as Eastern Meadowlarks, Brown Thrashers, Bobolinks and Sedge Wrens, and ecological communities.

Biological Resources Comment 23:

Commenters were generally concerned about impacts on the Northern harrier.

Response: See Responses to Biological Resources Comments 22 and 26.

Biological Resources Comment 24:

Commenters were generally concerned about impacts on the Short-eared owl.

Response: See Responses to Biological Resources Comments 22 and 26.

Biological Resources Comment 25:

A commenter stated that the Proposed Project will eliminate a heron rookery.

Response: Winter tree/vegetation clearing will minimize direct impacts to the rookery as it will occur after the herons have migrated offsite. Upon return, herons would be expected to establish a rookery in suitable habitat elsewhere onsite or offsite. The proposed wetland mitigation areas will also preserve and create/enhance habitat for non-endangered animal species, including herons.

Biological Resources Comment 26:

A commenter stated that the DEIS fails to evaluate migratory bird stopover use. Commenters expressed concerns about the negative impact of lighting for the Proposed Project on bird migration and asked whether Micron will support the “lights out” initiative to protect migratory birds. A commenter stated that the lighting plan needs to be redesigned to avoid impacts to birds.

Response: See Response to Oswego County Comment 10. The Micron Campus would operate 24 hours a day, seven days a week. As such, exterior lighting will be necessary for safety and operational reasons. The FEIS analyzes the potential adverse impacts that lighting associated with implementation of the Preferred Action Alternative—which includes the lighting strategies and measures discussed above—would have on avian species, including migratory bird species such as the Northern Harrier and Short-eared Owl. See, e.g., FEIS Sections 3.4.4.2 (effects of construction lighting on species) and 3.4.4.2 (effects of operational lighting on species).

However, the FEIS discusses numerous measures to minimize or mitigate the potential impacts from lighting on biological resources. Exterior lighting would be downward directional, shielded, warm white LED lights to reduce the potential impacts to aerial animals and insects. All nighttime exterior lighting at the Micron Campus would be designed to minimize light spillage or “trespass” beyond intended areas of illumination. See FEIS Table 2.1-5, Table 3.4-12, Section 3.13.5.

The Micron Campus lighting would be designed to meet the highest U.S. Green Building Council LEED standards for minimizing backlight, uplight, and glare, with a focus on achieving near-zero uplighting. This includes the aforementioned minimization measures as well as the use of cut-off optics to reduce uplight and trespass. Where feasible, Micron would use lights with high-quality optic controls on shorter poles to control lighting effects as needed. Additionally, office lights are planned to have motion sensors to automatically turn off when not in use.

The FEIS discusses placement and use of temporary construction lighting within construction and staging areas at the Micron Campus and Rail Spur Site to allow for work at night during authorized construction windows and to support site security. See FEIS Section 3.13.4.2, Construction Effects. The lighting would include approximately 20-to-30-foot-high portable light towers with multiple adjustable fixture heads on single poles. Micron would require its contractors to use lighting that conforms to the Town of Clay lighting code (section 140 of the Town Code) and, where feasible, lighting eligible for the LEED light pollution reduction credit for LZ1 land use zones. Construction of the Childcare Site would not take place at night and would only require minor safety and security lighting in limited areas. See FEIS Section 3.13.4.2, Childcare Site.

Biological Resources Comment 27:

A commenter stated that fall and spring migration surveys should have been conducted.

Response: Surveys during spring and fall would not have further informed the assessment of potential impacts to birds because all migratory bird species associated with the habitat types on the Micron Campus and native to the eastern U.S. would have the potential to occur during migration stopovers. Therefore, conducting surveys would not provide information that is not already known or could be assumed. Moreover, stopover habitat is not a limiting factor in this region. Potential impacts to birds from the Proposed Project are greatest for breeding birds, which are evaluated in the FEIS.

Accordingly, additional surveys were not necessary to evaluate the potential impacts on avian species or for the development of the BMPs and mitigation measures that are described in the FEIS, and that will be required for permitting, including the achievement of a net conservation benefit for state-listed species. See Response to Biological Resources Comment 22.

Biological Resources Comment 28:

A commenter stated that mitigation strategies should be developed and implemented for all bird species, including financial support and habitat creation and restoration near the Micron Campus.

Response: See Response to Biological Resources Comment 2, 6, and 22.

Biological Resources Comment 29:

A commenter stated that at least 75 contiguous acres should be the baseline for grassland bird habitat mitigation. A commenter asked what it means that mitigation will be carried out in five-year cycles and about the management of the mitigation sites.

Response: See Responses to Biological Resources Comments 2, 6, 22, and 31. To offset the loss of grassland habitat due to the Proposed Project, the NYSDEC requires that either three acres of new or improved habitat be protected for every acre lost, or one acre of new or improved habitat be protected for every one acre lost along with a commitment to manage that habitat in a grassland state for 15 years. See FEIS Section 3.4.5.2. In response, Micron, in partnership with The Wetland Trust Inc., a 501(c)(3) nonprofit organization, has proposed the permanent protection and active management of approximately 650 acres of high-quality grassland habitat. These lands will be restored and maintained as grassland for a minimum of 15 years, in three-year management cycles, across seven properties located in Oswego, Chenango, Yates, Cortland, Broome, Tompkins, and Tioga Counties—ranging from 10 to 60 miles from the Micron Campus. Each restored field will exceed 25 contiguous acres to ensure ecological viability. See FEIS Section 3.4.5.2.

Mitigation sites follow a general path that includes construction, monitoring, and long-term management. A 5-year cycle entails that a constructed mitigation site will be monitored for 5 years, at which time if 80% or more of the planted vegetation has established itself and continues to grow, the site can be deemed successful. If less than 80% of the vegetation is established, it is up to the

regulatory agency to determine the next steps, and it can potentially result in additional plantings and another 5-year monitoring period.

Biological Resources Comment 30:

A commenter stated that grassland habitat mitigation should be a 5:1 ratio to provide a net conservation benefit that accounts for the Proposed Project and induced growth effects.

Response: See Responses to Biological Resources Comment 2, 6, 22, 29, and 31. The mitigation ratios followed were determined based on consultation with USACE and NYSDEC to mitigate impacts from the Proposed Project, and for state-protected species, to achieve a net conservation benefit.

Biological Resources Comment 31:

A commenter stated that additional details on the mitigation parcels proposed is necessary to determine the adequacy of the proposed mitigation, including the shape of the parcels limiting edge areas and whether there is adjacent suitable habitat to the mitigation sites sufficient to establish habitat areas of at least 100 acres for each site. Another commenter stated that there are no detailed mitigation plans and that the mitigation plans must address long-term management responsibilities.

Response: See Response to Biological Resources Comments 5, 22, 29, and 30. The mitigation ratios used for the Proposed Project— such as 2:1 for bat roosting habitat and 3:1 for grassland bird habitat—are determined through consultation with the USACE, USFWS and NYSDEC, based on regulatory requirements and ecological best practices. See FEIS Section 3.4.5.2. Each grassland bird site exceeds the minimum size thresholds necessary to support viable habitat blocks, with restored fields designed to exceed 25 contiguous acres and, where feasible, to be part of larger habitat complexes of 100 acres or more.

As outlined in FEIS Appendix F-7 Compensatory Wetlands/Stream Mitigation Plan, the Off-site Compensatory Mitigation Plan includes the permanent protection of approximately 1,340 acres across six separate sites within the Oneida River watershed. These parcels were selected based on habitat quality, landscape connectivity, and their ability to support long-term ecological function.

Micron and The Wetland Trust, Inc., a 501(c)(3) nonprofit conservation organization, will oversee the acquisition, restoration, and long-term management of these parcels. Management responsibilities include habitat restoration, invasive species control, monitoring, and reporting, all conducted in accordance with approved conservation easements and subject to review by USACE, NYSDEC, and USFWS. These measures are designed to ensure that the mitigation sites remain ecologically functional and protected in perpetuity.

Biological Resources Comment 32:

A commenter stated that tree clearing should not occur until August 15 through November 1 to accommodate late-breeding birds or species that have multiple broods.

Response: As discussed in FEIS Section 3.4.4.2, tree clearing would not occur during the primary breeding season for most bird species (April through July). Therefore, construction would avoid direct effects on actively breeding woodland birds protected under the Migratory Bird Treaty Act. Micron will continue to coordinate with regulatory agencies to ensure that tree clearing and other construction activities are conducted in a manner that supports regional biodiversity and complies with applicable environmental protections. See FEIS Section 3.4.4.2 Preferred Action Alternative. Further, Micron has committed to BMPs for biological resources that include the retention of approximately 380 acres on the Micron Campus, including approximately 272 nearly contiguous acres of forested habitat. See FEIS Section 3.4.5.1.

Biological Resources Comment 33:

A commenter stated that Micron should use bird friendly glass in the buildings to mitigate loss of birds.

Response: Comment noted.

Biological Resources Comment 34:

A commenter stated that vegetation clearing required for the Project can result in increased water temperatures of nearby streams beyond the tolerance of cold-water fish and macroinvertebrates.

Response: As described in Appendix F-7, biological sampling conducted in June 2024 along Youngs Creek and its tributaries found aquatic communities dominated by tolerant species such as brook stickleback and central mudminnow—species adapted to low-oxygen, warm, lentic (still water) conditions. The perennial portion of Youngs Creek, which supports more sensitive species such as juvenile northern pike and green sunfish, is outside the Limits of Disturbance and will remain unimpacted by the Proposed Project. Further, Micron would implement BMPs for biological resources, including a Landscape Management Plan that would use native species where feasible to offset losses to habitat and native vegetated buffers, particularly in areas near sensitive habitats, to develop a transition zone and protect undeveloped habitats. See FEIS Section 3.4.5.1.

For surface waters within the Limits of Disturbance, FEIS Section 3.3.4.2 states that Micron, National Grid, OCWA, and OCDWEP will implement stormwater BMPs during construction of the Proposed Project and Connected Actions. These BMPs are specifically designed to reduce runoff rates, minimize erosion and sedimentation, and prevent contamination of surface waters—including thermal pollution. Stormwater management areas will be designed in accordance with the *New York State Stormwater Management Design Manual* (NYSDEC, 2024) and the *New York State Standards and Specifications for Erosion and Sediment Control* (NYSDEC, 2016). As outlined in FEIS Section 3.3.4.2 specific BMPs include:

- Runoff rate reduction: stone check dams, slope stabilization with turf matting, perimeter dikes or swales, and rock outlet protection.
- Erosion and sediment control: silt fencing, stone outlet sediment traps, compost filter socks, and compost filter bag sediment traps.

- Sediment transport prevention: temporary gravel roads and stabilized construction accesses.

All BMPs will be documented in site-specific Stormwater Pollution Prevention Plans (SWPPPs) and will be subject to regulatory oversight. Stream impacts are addressed in the Stream Mitigation Plans detailed in Appendix F of the FEIS.

Biological Resources Comment 35:

A commenter stated that wetland and stream loss will alter sediment, nutrient, and organic matter flows and may harm cold-water fish and macroinvertebrates.

Response: See Response to Biological Resources Comment 34 and Response to Water Resources Comment 27.

Biological Resources Comment 36:

A commenter stated that the DEIS does not adequately address impacts, or identify mitigation measures, related to soil erosion and runoff that will occur from the disturbed land and can cause harmful algal blooms, release toxins, deplete oxygen in the water, kill fish, and allow invasive species to spread.

Response: See Response to Biological Resources Comment 34 and Response to Water Resources Comment 27.

Biological Resources Comment 37:

A commenter expressed concern about the impact of PFAS on fish and the fishing industry.

Response: Based on presently known information, no impact to fish or fishing from PFAS is anticipated. See Responses to Water Resources Comments 31, 33, 34, 38, and 40 regarding the permitting of wastewater discharges to surface waters and treatment of PFAS. See also FEIS Appendix L-1. USEPA has developed recommended PFOS and PFOA criteria to protect aquatic life designated uses for freshwater and saltwater, as well as acute freshwater aquatic life benchmarks for eight PFAS (i.e., PFBA, PFHxS, PFNA, PFDA, PFBS, PFHxA, 8:22 FTUCA, and 7:3 FTCA), 89 Fed. Reg. 81077 (Oct. 7, 2024). NYSDEC has set final guidance values for PFOS in surface water sources at 160 parts per billion (ppb) for chronic risk in fresh water, 710 ppb for acute risk in fresh water, 41 ppb for chronic risk in saline water, and 190 ppb for acute risk in saline water. NYSDEC has determined that guidance values for PFOA in surface waters sources are not applicable for protection of aquatic life. These are the known standards to protect aquatic species at this time. To the extent that the regulatory requirements evolve, Micron will be required to meet them.

Biological Resources Comment 38:

A commenter stated the Proposed Project should avoid and minimize stream impacts to the greatest extent possible before relying on mitigation because filling in streams impacts Oneida Lake fisheries and endangered lake sturgeon.

Response: As described in the FEIS Section 3.3.4.2, the Proposed Project avoids impacts to the perennial extents of the Youngs Creek stream system located on the Micron Campus. These perennial reaches, which support more sensitive aquatic communities, are outside the Limits of Disturbance (LOD) and will remain unaffected by construction activities. See also Responses to Water Resources Comments 5 and 55.

Where stream impacts are unavoidable—primarily involving intermittent or ephemeral reaches—Micron has developed a Mitigation Plan (FEIS Appendix F) in coordination with the USACE and NYSDEC. This plan includes restoration of stream channels, wetland re-establishment, and long-term ecological monitoring to offset losses and maintain watershed function.

Biological Resources Comment 39:

A commenter stated that additional protections should extend to creek habitats supporting mussels, fisheries such as sturgeon, and floodplain forests.

Response: See Responses to Biological Resources Comment 34 and 38 and FEIS Sections 3.3.5 and 3.4.5, which discuss BMPs and Mitigation Measures.

Biological Resources Comment 40:

A commenter stated that the DEIS includes an assumption that mobile species will move to remaining suitable habitat but does not consider the availability of suitable habitat within the range of affected mammals and birds or the potential for increased traffic to harm wildlife by cutting off migration routes or increasing the number of wildlife fatalities.

Response: The lead agencies acknowledge the impacts of construction of the Proposed Project, even on mobile species in FEIS Section 3.4.4.2. However, as shown in Figure 3.4-1 and Table 3.4-1, the dominant ecological communities at the proposed Micron Campus location are best characterized as successional old field, floodplain forest, and successional shrubland, followed by deep emergent marsh, red maple-hardwood swamp, shallow emergent marsh, and mowed lawn with trees. These types of ecological communities are common to Onondaga County and the surrounding five-county region (Cornell 2024, SOCPA 2022, USGS NLCD 2023).

Notwithstanding, the Proposed Project incorporates required design and mitigation strategies intended to reduce impacts on habitat connectivity. These include maintaining and enhancing buffer zones, implementing a Landscape Management Plan using native species where feasible, preserving key habitat corridors where feasible, and implementing off-site conservation measures to support regional ecological integrity. See FEIS Table 3.4-8. These buffers are intended to support habitat connectivity and reduce edge effects. Further, Micron has committed to BMPs for

biological resources that include the retention of approximately 380 acres on the Micron Campus, including approximately 272 nearly contiguous acres of forested habitat (see FEIS Section 3.4.5.1).

Biological Resources Comment 41:

Commenters discussed avoidance and minimization measures for species impacts such as scheduling construction outside of breeding and migration periods and using exclusion fencing and wildlife crossings.

Response: See Responses to Biological Resources Comments 9 and 40. FEIS Section 3.4.5.1 describes the BMPs the project will be required to implement to minimize impacts to T&E species. These include wintertime tree clearing, tree marking, retention of onsite roosting and foraging habitat where feasible, and limited nighttime construction. As discussed in Section 3.4.4.2 of the FEIS “tree clearing would not occur during the primary breeding season for most bird species (April through July). Therefore, construction would avoid direct effects on actively breeding woodland birds protected under the Migratory Bird Treaty Act. Consistent with NYSDEC guidance, to avoid effects on grassland birds, construction in open fields would be limited to late summer and early fall, after the breeding period but before the wintering period.”

Biological Resources Comment 42:

A commenter stated that the DEIS should consider or evaluate installation of horizontal passageways or structures for migrating animals, road crossings, and vernal pool protections.

Response: See Responses to Biological Resources Comments 9, 40, and 41. Micron has designed areas of hydrological connectivity, such as bottomless culverts, to allow for the movement of species.

Biological Resources Comment 43:

A commenter stated that Micron should commit to wildlife corridors and habitat connectivity, not just buffer zones.

Response: See Response to Biological Resources Comment 9, 40, 41, and 42.

Biological Resources Comment 44:

A commenter asked for a description of any efforts to relocate plant and animal species.

Response: There are no plans to physically relocate any plant or animal species. Site development has been designed to avoid and minimize impacts to natural resources to the extent practicable. As discussed in FEIS Section 3.4.4.2 Ecological Communities, many species, including beavers, white-tailed deer, and various birds would most likely attempt to relocate to undisturbed portions of the site or to other habitats not at carrying capacity. Although no plant relocation is planned, as stated in FEIS Table 3.4-8, Construction Effects on Ecological Communities (Micron Campus),

Micron would implement a Landscape Management Plan (LMP) to incorporate landscaped areas in the vicinity of new buildings, parking lots, and stormwater management areas with the completion of each fab (and at the Childcare Site), prioritizing native species in this LMP. See FEIS Section 3.4. Micron also would plant native vegetated buffers along the perimeter of the campus where feasible, particularly in areas near sensitive habitats (including wetlands), to develop a transition zone between developed and undeveloped habitats. Preliminary landscape drawings can be found in Appendix G-10 of the FEIS.

Further, the Proposed Project will be required to comply with all local, state, and federal regulations regarding the protection of plant and animal species, as well as any measures determined during the Section 7 USFWS and NYSDEC consultations. Mitigation and Net Conservation Benefit plans will further provide protection to plant and animal species.

Biological Resources Comment 45:

A commenter stated that construction should be slowed to provide time for wildlife species to exit the area while tree clearing occurs and that removed trees should be sold and the funds used for habit restoration and reforestation.

Response: See Responses to Biological Resources Comments 40 and 44. As discussed in FEIS Section 3.4.4.2 Ecological Communities, the Proposed Project will be developed in phases, which will result in a more gradual transformation of the site and provides opportunities for wildlife to relocate from active construction zones to surrounding habitat. The impacts from construction of the Proposed Project will be minimized through the implementation of BMPs discussed in FEIS Section 3.4.5.1. For example, where feasible, vegetated buffers and undisturbed habitat (including approximately 272 nearly contiguous acres of forest on the Micron Campus site) will be retained to support wildlife movement and reduce fragmentation. As discussed in FEIS Section 3.4.4.2, part of the construction phased approach includes timing restrictions for tree clearing—developed in consultation with the USFWS. The timing restrictions will be followed to avoid sensitive periods for threatened and endangered species but will likely benefit other species as well.

FEIS Section 3.8.3.2 provides that forestry material “would be processed (e.g., mulched) on-site and reused as cover material to reduce erosion, help establish vegetation, or serve other construction purposes and thereby reduce the need for off-site hauling. Any remaining tree debris not reused on-site would be recycled at local sawmills and mulch processing, compost and topsoil, pallet manufacturing, and biomass power generating facilities.

Biological Resources Comment 46:

A commenter stated that the DEIS should evaluate the possibility of constructing around areas of mature trees and wetlands to save those areas.

Response: The Alternative Analysis in FEIS Section 2.2 evaluated different site configurations. See FEIS Appendix B-3. However, none of the site layout alternatives besides the Preferred Action Alternative would be technically or economically feasible or practicable because each would create inefficiencies that would prevent the Micron Campus from achieving the semiconductor wafer output necessary to achieve commercial viability. In addition, all of the site layout

alternatives besides the Preferred Action Alternative would result in either the same amount of permanent losses of Federal jurisdictional wetlands or the permanent loss of approximately 16-20 additional acres of Federal jurisdictional wetlands. See FEIS Section 2.2.4.

See Responses to Water Resources Comment 5 and Biological Resources Comment 2, 6 and 9. The project incorporates impact minimization strategies where feasible and mitigation strategies. As outlined in FEIS Section 3.4.5.1. and 3.4.5.2., these minimization and mitigation strategies include the following:

- Retention of approximately 380 acres on the Micron Campus site, including approximately 272 nearly contiguous acres of forested roosting habitat, approximately 84 acres of former cropland (mostly successional old field and shrubland), and approximately 11 acres of non-forested wetlands;
- Avoidance of high-value ecological areas, such as the perennial portions of Youngs Creek;
- Retention of vegetated buffers near sensitive habitats;
- Phased construction to reduce immediate disturbance; and
- Ongoing coordination with regulatory agencies to refine mitigation and avoidance measures.

Biological Resources Comment 47:

A commenter stated that the DEIS fails to provide binding mitigation measures that satisfy the no-jeopardy requirement under Section 7 of the Endangered Species Act.

Response: See Response to Biological Resources Comment 16. The BA has been approved by USFWS and is included in Appendix G-4 of the FEIS. USFWS' BO will be included in the Record of Decision and will address the potential incidental take of federally listed species associated with the Proposed Project. All disturbances related to threatened and endangered species will follow all applicable and relevant USFWS and NYSDEC regulations. The Proposed Project will follow all determinations issued because of the Section 7 process.

Biological Resources Comment 48:

A commenter stated that mitigation efforts should have independent oversight.

Response: See Response to Biological Resources Comment 16 and 47. All mitigation plans implemented through The Wetland Trust, Inc. will be monitored by the USACE, Regulatory Branch, Auburn Office and NYSDEC Region 7 Headquarters in Syracuse, as discussed in Section 7 of the Off-site Compensatory Mitigation Plan (FEIS Appendix F-7, Appendix N, Attachment B). This regulatory agency monitoring will continue for 10 years, unless additional monitoring is required by either agency to ensure performance standards are being met. Current monitoring schedules include at minimum a post construction report that details the year of completing plantings and 10 monitoring reports over the course of 15 years of vegetative growth. The overview in Appendix F of the FEIS includes detailed anticipated monitoring schedules, and the type of content to be included in the monitoring reports.

Section 3.4.5.2 of the FEIS includes multiple mitigation measures for bats, including the purchase and permanent protection of twice the amount of roosting habitat that would be lost due to Proposed Project and Connected Action construction, and funding for research and monitoring efforts to benefit science-based bat species conservation and management programs in New York State. Micron will be responsible for developing a mitigation plan in coordination with USFWS and NYSDEC. See also Response to Biological Resources Comment 7.

For grassland birds, Micron and The Wetland Trust, Inc., a 501(c)(3) nonprofit organization, have proposed to purchase 650 acres of sufficiently high-quality habitat for permanent protection and to restore and manage the habitat as grassland for 15 years (in 3-year cycles) to achieve the required net conservation benefit. A final grassland protection plan would be developed in coordination with NYSDEC to achieve a net conservation benefit for listed grassland birds, including northern harriers and short-eared owls, based on technologically, economically, and biologically practicable measures, and would be subject to NYSDEC review and approval.

Biological Resources Comment 49:

A commenter asked about long-term measures to protect remaining habitat and conservation easements.

Response: See Responses to Water Resources Comment 11 and Biological Resources Comment 48. The Wetland Trust will protect via conservative easements bat roosting habitat, grassland bird habitat, and the wetland mitigation sites. Approximately 272 undisturbed acres of forested roosting habitat on the Micron Campus will be protected via conservation easement.

Biological Resources Comment 50:

A commenter stated that biological and botanical experts should oversee the construction and long-term curation of repurposed properties used as mitigation.

Response: See Response to Biological Resources 16 and 48. All off-site mitigation will be coordinated with and approved by USACE and NYSDEC and conducted through The Wetland Trust, Inc., a 501(c)(3), a New York based company that owns and manages conservation easements. The Wetland Trust, Inc., along with monitoring and regulation by USACE and NYSDEC will serve as expert oversight of the construction and long-term management of the mitigation sites. See also FEIS Appendix F-7, Appendix N, Attachment B).

Biological Resources Comment 51:

A commenter suggested that given the habitat value and carbon sequestration capabilities of the trees that will be removed, Micron should provide funds to Onondaga Earth Corps, Onondaga Audubon, CNY Land Trust or equivalent NFPs so that an equivalent number of trees are planted within Onondaga or Oswego County to make up for the trees that are removed. Another commenter suggested that Micron plant trees that could provide habitat for endangered species and provide trees to local residents to plant.

Response: See Responses to Biological Resources Comments 6, 7, 8, 9, and 61.

Biological Resources Comment 52:

A commenter stated that wildlife mitigation should involve restoration of habitat.

Response: In addition to the BMPs described in FEIS Section 3.4.5.1 to minimize impacts to wildlife, Section 3.4.5.2 describes mitigation measures for bats and grassland birds, including grants for projects to benefit bat species, hibernaculum gating, installation of roost boxes, and management and stewardship of offsite bat mitigation sites. Micron and The Wetland Trust, Inc. have proposed to purchase 650 acres of sufficiently high-quality habitat for permanent protection and to restore and manage the habitat as grassland. Also, as described in the Off-site Compensatory Mitigation Plan (FEIS Appendix F-7, Appendix N, Attachment B), and required as a condition of Micron's wetlands permits, Micron will offset impacts to wetlands at a 2.2:1 rate on average. The mitigation rates for each type of wetlands can be found in FEIS Section 3.3.5. Under the Mitigation Plan, Micron would be required to enhance, establish, or restore a total of 422.14 acres of wetlands and restore a total of 14,030 LF of streams through permittee-responsible mitigation at the mitigation sites. See also Responses to Biological Resources Comments 7, 12, and 48.

Biological Resources Comment 53:

A commenter stated that the DEIS does not provide specific mitigation or consider harm related to loss of habitat connectivity or off-site effects such as increased traffic and noise or development of commercial space or housing.

Response: As outlined in FEIS Section 3.4.4.2, Growth Inducing Effects, "[t]he loss of at least some additional biological habitat would be expected within the five-county region due to site excavation, filling, and grading activities that would be required for construction of other residential or commercial development, including expansion of semiconductor supply chain business in the region." However, "[b]ecause these projected losses of forestland and grassland habitats due to induced growth are contingent on the specific locations, extent, and nature of future development, it is not feasible to project specific future losses of forest- and grassland-dependent wildlife, including protected bats or grassland birds. Although the projected habitat losses described above may serve as proximate indications of future species losses, the projected net habitat losses are relatively low, and may be offset by land cover ecological succession rates. Therefore, the Preferred Action Alternative has low potential to result in significant growth inducing effects on biological resources."

As discussed in FEIS Section 3.4.5.1, Micron will also be required to implement BMPs to minimize the effects of the Proposed Project on biological resources. These measures are summarized in Table 3.4-12 and include maintaining and enhancing buffer zones, implementing a Landscape Management Plan using native species where feasible, preserving key habitat corridors where feasible, and implementing off-site conservation measures to support regional ecological integrity. Specific noise mitigation measures include:

- Installation of sound attenuators, acoustical louvers, and sound walls at the Micron Campus and Childcare Site to reduce operational noise from rooftop air handlers and cooling fans.
- Upgrades to Rail Spur conveyor equipment, including improved pulleys, return idlers, and rubber flashing on hoppers, to reduce noise and minimize disturbance to adjacent bat habitat.

Biological Resources Comment 54:

A commenter stated that Micron should be required to develop a construction mitigation plan to reduce the impact to reptiles, amphibians, and small mammals with limited mobility.

Response: See Response to Biological Resources Comment 2, 6, and 45. As discussed in FEIS Section 3.4.4.2, Construction Effects, the Proposed Project will be developed in phases, which provides an opportunity for wildlife to relocate from active construction zones. Further minimization measures will also be employed during construction to reduce impacts including employing a biological monitor to oversee implementation of BMPs and other measures intended to minimize effects on biological resources. See FEIS Section 3.4.5.1.

As described in FEIS Section 3.3 (Water Resources), Micron would also be required to implement stormwater BMPs and would be required to undertake SMPs that would be documented in a SWPPP as part of its NYSDEC SPDES Construction General Permit to protect water quality of remaining wetlands and surface waters, and establish suitable habitat, for reptiles and amphibians. See FEIS Appendix F-8 for the draft SWPPP. See also Response to Water Resources Comment 27.

Biological Resources Comment 55:

A commenter stated that Micron should create a dedicated conservation area with comparable ecological features to lost wetlands and partner with environmental organizations to protect and restore the land as habitat for impacted species.

Response: See Responses to Water Resources Comments 6, 7, and 9. The basis for selection of mitigation sites was to match physical, chemical, and biological functions between the impacted and restored ecosystems. See also Biological Resources Comments 7, 12, 48 and 50; FEIS Appendix F-7, Appendix N, Attachment B. All off-site mitigation will be conducted through The Wetland Trust, Inc., a 501(c)(3), New York based company that owns and manages conservation easements. The Wetland Trust, Inc., along with monitoring and regulation via USACE and NYSDEC will serve as the experts overseeing the construction and long-term management of the

mitigation sites. These conservation easements would protect the wetland and stream habitat areas in perpetuity.

Biological Resources Comment 56:

A commenter stated that stormwater retention features could be designed to provide beneficial habitat.

Response: FEIS Section 3.3.4.2 (and Table 3.3-11) discusses Proposed Stormwater Management Practices including wet extended detention ponds, filtration bioretention areas, stormwater planters, and green roofs. The Childcare Site would include stormwater management areas, a pollinator garden, vegetative screenings, a tree island, and shade trees. These features can support native vegetation, improve habitat connectivity, and offer refuge for low-mobility and moisture-dependent species.

Biological Resources Comment 57:

A commenter suggested restoring disturbed areas and enhancing green spaces and landscaped buffers with native plants, bird boxes, amphibian ponds, and stormwater systems that mimic natural hydrology.

Response: See Responses to Biological Resources Comments 9, 12, and 56. As stated in FEIS Table 3.4-8, *Construction Effects on Ecological Communities (Micron Campus)* in Section 3.4, Micron would implement a Landscape Management Plan (LMP) to incorporate landscaped areas that prioritize native species in the vicinity of new buildings, parking lots, and stormwater management areas with the completion of each fab (and at the Childcare Site). Nesting boxes can be considered in the Landscape Management Plan. Micron also would plant native vegetated buffers along the perimeter of the Micron Campus where feasible, particularly in areas near sensitive habitats (including wetlands), to develop a transition zone between developed and undeveloped habitats and offer a degree of protection to the undeveloped habitats from the effects of fragmentation and invasive species. Preliminary landscape drawings can be found in FEIS Appendix G-10. Additionally, SMPs would be implemented to preserve existing drainage patterns to the greatest extent practicable, maintain the conveyance of upland watershed runoff, control increases in stormwater volume, prevent soil erosion and sedimentation, and reduce runoff through the use of green infrastructure where feasible. See also Response to Water Resources Comment 20.

Biological Resources Comment 58:

A commenter stated that Micron should plant thrice as many trees as they intend to destroy, and to continue to plant trees throughout our county to offset the carbon footprint. Other commenters supported planting trees as mitigation or funding not-for-profit groups to plant trees.

Response: See Responses to Biological Resources Comments 6, 7, 8, and 9. As described in FEIS Table 3.3-13, the anticipated mitigation ratio for federal palustrine forested wetlands and the various state forested wetlands (re maple hardwood swamp, hemlock hardwood swamp, and

floodplain forest) is 3 to 1. This means that for every one acre of forested wetlands impacted, three acres will be protected, rehabilitated, reestablished, and/or restored as part of the Mitigation Plan (FEIS Appendix F). See also Responses to Climate Change/GHG Comments 38 and 39.

Biological Resources Comment 59:

A commenter stated that Micron should use native plants and include shagbark hickory in the Compensatory Mitigation Plan for Red Maple Hardwood swamps.

Response: The lead agencies will require Micron to consider this comment in consultation with the applicable regulatory agencies and requirements.

Biological Resources Comment 60:

A commenter stated that native conservation plantings should be established following ideas of Homegrown National Park (<https://homegrownnationalpark.org>).

Response: Micron will consider this suggestion in consultation with the applicable regulatory agencies. See also Responses to Biological Resources Comments 57 and 58 and Table 3.4-8, *Construction Effects on Ecological Communities (Micron Campus)*, in FEIS Section 3.4, which highlights Micron's implementation of a Landscape Management Plan.

Biological Resources Comment 61:

A commenter stated that Micron should support and fund local municipalities and nonprofit organizations to build training programs that promote conservation of habitat.

Response: As described in FEIS Section 3.4.5.2, Micron proposes to establish a conservation grant fund to support the long-term protection and management of bat species, including the Indiana bat, northern long-eared bat, and tricolored bat. To help offset potential regional impacts associated with growth induced by the Proposed Project, Micron would provide up to \$100,000 annually for 10 years in grant funding for projects that directly benefit these species.

Biological Resources Comment 62:

A commenter expressed concern about the impacts of PFAS releases on wildlife and states that the DEIS fails to take a hard look at the potential impacts on species and ecosystems.

Response: See Responses to Biological Resources Comment 37 and Water Resources Comments 31, 33, 34, 38, and 40. Potential releases of PFAS are addressed in the FEIS, based on the information that is currently available and the current state of monitoring and treatment technologies. The FEIS specifically identifies PFAS use and presence in wastewater and discusses current regulatory approaches. As discussed in FEIS Section 3.8.3.2 and Appendix L-1, Micron will be required to secure an IDWP from OCDWEP that will require Micron to meet discharge limits for PFAS, employing onsite to wastewater pretreatment to meet those limits.

PFAS also would be addressed by the other regulatory controls, including appropriate storage and handling of chemicals, and spill prevention planning, which are discussed in the FEIS.

Biological Resources Comment 63:

Commenters were generally concerned about the spread of invasive species from disturbances caused by the Proposed Project.

Response: See Responses to Biological Resources Comments 31 and 63; Response to Water Resources Comment 16. As described in FEIS Table 3.4-8 *Construction Effects on Ecological Communities (Micron Campus)*, because invasive species have the potential to compromise the integrity of the remaining ecological communities during construction, Micron will be required to implement an Invasive Species Management Plan (ISMP) that “govern[s] each construction phase, including measures to manage soil and debris to reduce invasive species transport on-site. Biological surveys would be conducted in coordination with construction contractors prior to commencing each phase. Efforts to eliminate invasive species would continue throughout the construction period as needed and the ISMP would be amended to address site-specific invasive species and other issues as they arise.” See FEIS Appendix G-9 (draft plan).

Micron will also be required to implement a Landscape Management Plan to incorporate native species in landscaped areas near the new buildings, as well as plant native vegetative buffers along the Micron Campus perimeter, where feasible, with a focus on areas near any remaining sensitive habitats to build up a transition zone between developed and undeveloped areas. Preliminary landscape drawings can be found in FEIS Appendix G-10.

3.5 Historic and Cultural Resources

Historic/Cultural Resources Comment 1:

General concern was raised that the influx of population and new builds will lead to the demolition, neglect or irreversible alteration of historic buildings, landscapes and districts.

Response: Through ongoing consultation, regulatory compliance, and mitigation planning, the project seeks to ensure that historic properties are identified, evaluated, and protected throughout the development process. The FEIS and associated Section 106 studies were prepared in coordination with the New York State Historic Preservation Officer (NYSHPO), Tribal Historic Preservation Officers (THPOs), and other consulting parties. These consultations informed the definition of the Area of Potential Effect (APE)—the geographic area within which the proposed project may directly or indirectly alter the character or use of historic properties, as defined in 36 CFR 800.16. The Section 106 process includes:

- Initiating consultation with relevant parties
- Identifying historic properties within the APE
- Assessing potential adverse effects
- Resolving adverse effects through avoidance, minimization, or mitigation

These efforts also establish compliance with Section 14.09 of the New York State Historic Preservation Act (NYSHPA), which addresses impacts to resources listed or eligible for listing in the State Register.

FEIS Section 3.5, along with completed and ongoing studies conducted under Section 106 of the National Historic Preservation Act of 1966 (as amended), evaluates potential impacts on properties listed in or eligible for listing in the National Register of Historic Places. FEIS Section 3.5.2.3 outlines the identification of historic properties within the APE for the Micron Campus and Connected Actions and presents the results of those investigations. Appendix H-2 provides a summary of Section 106 consultation conducted to date.

Induced growth throughout the five-county region has the potential to affect historic architectural properties and archaeological resources. Although it cannot be predicted exactly when, or to what degree, induced growth would affect historic architectural properties, any future development requiring discretionary approvals would also be required to comply with Section 106 of the NHPA or Section 14.09 of the NYSHPA. See FEIS Section 3.5.2.3. Similarly, new development would still be subject to local land use regulations, such as setbacks, height restrictions, and landscaping and lighting requirements. See FEIS Section 3.13.4.2, Growth Inducing Effects. Other large projects also would be subject to site plan approvals and may be subject to the SEQRA process, which may include consideration, as here, of visual effects or aesthetic impacts on designated aesthetic resources. If future growth is concentrated in “centers,” and does not occur on contiguous farmland, it would be consistent with Plan Onondaga’s goal to encourage compact development to avoid sprawl and maintain rural character. See also Response to Historical/Cultural Resources Comment 7.

Historic/Cultural Resources Comment 2:

Describe what the public review process is for the ongoing study on historic and cultural resources. Add any new findings from those studies in the Final EIS and describe the most current schedule for completion of these studies as they could affect the start of construction.

Response: See Response to Historical/Cultural Resources Comment 1, discussing the Section 106 review process. CPO is serving as the lead Federal agency for Section 106 consultation for the Proposed Project and Connected Actions. See FEIS Section 3.5.1. As discussed in Section 3.5.4, “[t]o ensure that CPO’s responsibilities under the NHPA and its implementing regulations are met, Micron will not be authorized to begin construction of the Proposed Project or commence use of staging, storage, or temporary work areas or new or to-be-improved access roads until the Section 106 obligations have been met as defined under the PA, even if Micron receives funding and all other permits are obtained.”

This process ensures that any necessary mitigation measures can be developed and implemented in advance, minimizing potential impacts to historic and cultural resources. Currently, all conditions outlined above have been met for project components/portions of project components that are scheduled to begin construction in early 2026, following all necessary project approvals/permits. Field investigations for future project components will be completed prior to the scheduled construction start dates for those components. CPO is in the process of preparing a Programmatic Agreement (PA) for the Proposed Project and Connected Actions that will

implement a phased identification process to defer the final identification and evaluation of archaeological resources. See Response to Historic/Cultural Resources Comment 3. Section 106 consultation will continue throughout the process, and updates will be shared with consulting parties and the public, as appropriate. The results of ongoing archaeological and cultural resource studies will be documented and made available to the public in accordance with the SEQRA, Section 106 of the NHPA, and Section 14.09 of the NYSHPA. See also 36 C.F.R. 800.2(d). While sensitive information—such as the precise locations of archaeological sites—will be withheld to protect these resources, all other findings are included in the FEIS, where available.

Historic/Cultural Resources Comment 3:

The text on page 3-145 indicates that the Phase 1B investigations will be completed as well as all consultations completed prior to any intrusive construction in 2025. The Final EIS should provide a realistic schedule for these efforts so that the public is aware of any construction schedule delays.

Response: See Response to Historic/Cultural Resources Comment 2. Phase 1B workplans have been completed. As noted in FEIS Section 3.5.2.2, Phase 1B archaeological testing in the APEs for the Micron Campus (Phase 1A construction area), Rail Spur Site, Childcare Site, Industrial Wastewater Treatment Plant, Industrial Wastewater Conveyance, Natural Gas Line, and Electric Service has been completed. Phase 1B archaeological testing is ongoing for the Water Supply Connected Action and Micron Campus Phase 1B, 2A, and 2B construction areas. There will be no change to the construction schedule for the Proposed Project based on the status of the Phase 1B investigations.

Historic/Cultural Resources Comment 4:

A commenter asked whether there will be funding for stabilization of historic neighborhoods in Syracuse and other legacy cities.

Response: Decisions regarding local housing approvals and funding fall under the authority of relevant federal, state, and local agencies. See Response to Socioeconomic Comment 19, discussing funding for regional housing initiatives under the Green CHIPS Community Investment Fund.

Historic/Cultural Resources Comment 5:

The DEIS provides only limited analysis of how such widespread land use change could affect historic resources—particularly in rural, agricultural, or historically residential areas where unregulated growth may alter historic context, fabric, and community identity.

Response: Section 106 of the National Historic Preservation Act (NHPA) (54 U.S.C. § 306108; 36 C.F.R. Part 800) and Section 14.09 of the New York State Historic Preservation Act (NYSHPA), codified in the NYS Parks, Recreation and Historic Preservation Law, provide the federal and state regulatory framework under which the Lead Agencies must consider the effects of the Project on historic properties. Compliance with the requirements of these programs is

thoroughly discussed in FEIS Section 3.5 and remains ongoing. See Responses to Historical/Cultural Resources Comments 1 and 3.

Historic/Cultural Resources Comment 6:

The DEIS assumes that the open space and agricultural land that are referred to as “vacant” or “underutilized” are available for transformation and there is little attention given to their historic significance or community value. If consumed by speculative subdivisions or generic corporate parks, the region risks losing elements of its distinct identity.

Response: See Response to Historic/Cultural Resources Comment 1. FEIS Section 3.5.3 acknowledges that induced growth could potentially impact historic properties, including those in rural, agricultural, or historically residential areas. While the FEIS may refer to certain lands as “vacant” or “underutilized,” it does not assume these areas lack historic or cultural value. Rather, the FEIS recognizes that such areas may contribute to the region’s historic context and community identity. Any future development requiring discretionary approvals must comply with both the NHPA and NYSHPA, ensuring that historic significance is considered before transformation occurs.

Historic/Cultural Resources Comment 7:

The DEIS should include a comprehensive review of historic resources in areas likely to experience induced growth.

Response: See Response to Historical/Cultural Resources Comment 1. FEIS Section 3.5.3 acknowledges that induced growth has the potential to affect historic properties, but such impacts cannot be predicted at the individual property level. The section notes that any future development requiring discretionary approvals must comply with NHPA and NYSHPA. In accordance with SEQRA, Section 106, and Section 14.09, an analysis of the direct areas of potential effect (APE) must be conducted to the extent that it can be reasonably foreseen. These APEs are subject to review and approval by SHPOs, THPOs, and other consulting parties.

Because areas of induced growth cannot be accurately predicted, their potential impacts on historic resources cannot be studied in advance. FEIS Section 4.2 discusses reasonably foreseeable future actions, with Table 4.2-1 identifying the distance of these actions from the Micron Campus and the associated resources. These actions are also likely to require discretionary approvals, triggering compliance with NHPA, NYSHPA, and/or SEQRA.

Historic/Cultural Resources Comment 8:

Micron should provide incentives for historic housing rehabilitation.

Response: See Response to Historical/Cultural Resources Comment 4.

Historic/Cultural Resources Comment 9:

Concerns were raised regarding the widening of Route 31 and the potential impact it has on historic properties and places of worship, including the Immanuel Lutheran Church.

Response: See Response to Visual/CC Comment 3. Proposed right-of-way limits for specific roadway widenings are typically determined during roadway design development, at which time discussions between the NYSDOT and adjacent property owners would occur.

The effects on the status of historic structures within the area of impact are discussed in FEIS Section 3.5 and Appendix H. While not discussed in the FEIS, the Immanuel Lutheran Church was evaluated for listing in the National Register of Historic Places (NRHP) as part of the Section 106 Consultation Process, adhering to the National Historic Preservation Act of 1966, as amended. The structures on the church parcel were surveyed in the Architectural Resources Survey Report (AKRF 2024:20) which recommended the church as not eligible for listing in the NRHP as a result of alterations to the original church structure over time. Based on its review of the Architectural Resources Survey Report, SHPO opined that the Immanuel Lutheran Church is not eligible for listing in the NRHP in a letter dated December 13, 2024.

Historic/Cultural Resources Comment 10:

A commenter stated that there are no historical and archeological sites located within the area where the Micron plant is to be constructed. However, the commenter mentioned the following nearby sites, raising concern that these areas will not be fully explored with their information and locations being preserved before they are completely destroyed by related development: (1) the early Onondaga encampment located at Three-Rivers on the Clay side of the river; (2) on the Schroepfel side of the river is the location of an early fort as well as the encampment of 10,000 troops. This area also is the location of where early Circle Mounds were located; (4) the location of the Great Stone Bowl makers at Horseshoe Island; (5) the Oak Orchard area contains many sites including three native burial grounds, camping and fishing sites. This also was the location of the Paleo Indians and the Greenland Eskimos. Oak Orchard is also the site of an early massacre; (6) The Great Flint Rock was located near Caughdenoy Road. There is also at least one booklet on the burials from there to Brewerton; and (7) the Town of Schroepfel on the other side of the river also has many sites (specific sites not provided). A lot of work needs to be done to save this historic information, perhaps by New York college students.

Response: See Responses to Historical/Cultural Resources Comment 1, 2 and 7. As discussed, FEIS Section 3.5.3 acknowledges that induced growth has the potential to affect historic properties, but such impacts cannot be predicted at the individual property level. The section notes that any future development requiring discretionary approvals must comply with NHPA and NYSHPA. In accordance with SEQRA, Section 106, and Section 14.09, an analysis of the direct APE must be conducted to the extent that it can be reasonably foreseen. These APEs are subject to review and approval by SHPOs, THPOs, and other consulting parties. See also Response to Nation Comment 30.

The results of ongoing archaeological and cultural resource studies will be documented and made available to the public in accordance with the SEQRA, Section 106 of the NHPA, and Section 14.09 of the NYSHPA. See also 36 C.F.R. 800.2(d). Archaeological work plans for all parts of this project have been completed and archaeological Phase IB investigations, including excavations to identify unknown archaeological sites, will be completed in a phased approach throughout the construction process.

3.6 Air Quality

Air Quality Comment 1:

General comments or concerns were raised that the Project will have a negative impact on air quality in the community.

Response: FEIS Chapter 3.6 provides a comprehensive analysis of air emissions associated with stationary and mobile sources from both the construction and operational phases of the Proposed Project. This includes evaluation of criteria pollutants and their precursors (e.g., volatile organic compounds (VOCs), particulate matter (PM), nitrogen oxides (NO_x), hazardous air pollutants (HAPs) and regulated non-criteria pollutants from both stationary and mobile sources associated with the Proposed Project.

These analyses, including air dispersion modeling of the maximum emissions generating scenario detailed in FEIS Chapter 3.6 and Appendix I, were conducted in the context of Clean Air Act and New York state thresholds and regulatory guideline concentrations designed to protect human health and the environment. FEIS Chapter 3.6 and Appendix I demonstrate that the Project will not cause or contribute to an exceedance of any National Ambient Air Quality Standard (NAAQS) health-based regulatory threshold for criteria pollutants, non-criteria pollutant annual guideline concentrations (AGCs) or short-term guideline concentrations (SGCs) throughout both the construction and operational phases of the Proposed Project.

Air Quality Comment 2:

The DEIS lacks clear modeling of emissions related to fab operations, diesel construction fleets, and chemical deliveries.

Response: FEIS Chapter 3.6 presents a thorough and comprehensive analyses of project-associated emissions for both construction and operation phases, including for criteria pollutants and precursors (e.g., VOCs, particulates), HAPs and regulated non-criteria pollutants, for both stationary and mobile sources, which includes facility operations and truck traffic in the context of Clean Air Act and New York state thresholds and regulatory guidelines protective of human health. Appendix I of the FEIS provides an assessment of the air modeling conducted, including modeling performed for mobile and stationary sources, including criteria pollutants and non-criteria pollutants associated with the Project.

The modeling was performed in accordance with USEPA and NYSDEC requirements and guidelines, including: (1) the USEPA user guides for the EPA Regulatory AERMOD Modeling System available from USEPA's Support Center for Regulatory Atmospheric Modeling website,

(2) the USEPA's Guideline on Air Quality Models (40 CFR Part 51 - Appendix W), (3) DAR-10: NYSDEC Guidelines on Dispersion Modeling Procedures for Air Quality Impact Analysis, and (4) DAR-1: Guidelines for the Evaluation and Control of Ambient Air Contaminants under 6 NYCRR Part 212.

Air Quality Comment 3:

The DEIS lacks clear modeling of volatile organic compounds (VOCs), particulate matter, and other emissions related to fab operations, diesel construction fleets, and chemical deliveries.

Response: See Response to Air Quality Comment 2. FEIS Chapter 3.6 presents analyses of project-associated emissions for both construction and operation phases, including for criteria pollutants (e.g., VOCs, particulates, HAPS) and regulated non-criteria pollutants, for both stationary and mobile sources, in the context of Clean Air Act thresholds and regulatory guidance concentrations protective of human health.

Air Quality Comment 4:

Micron should have to provide more support for using Rochester air quality monitoring or do actual monitoring to demonstrate no NAAQS exceedances. Conditions in Rochester may be expected to be similar, but Micron should at least be required to demonstrate—with actual local monitoring data—that they are before relying on these figures to demonstrate that the facility will not have any significant environmental impacts.

Response: See Response to Nation Comment 9. FEIS Section 3.6.3.2 demonstrates compliance with NAAQS thresholds for regulated criteria pollutants under a conservative approach based on preliminary design information assuming all four fabs are operational, although initially construction and operation of only Fabs 1 and 2 is expected. As further discussed in FEIS Chapter 3.6 and Appendix I, the proposed Micron Campus is located in a more rural area compared to the location of the air monitors in Rochester and Syracuse, and therefore the ambient background air quality in the Rochester and Syracuse monitoring locations is a conservative representation of background concentrations in the Proposed Project area.

Air Quality Comment 5:

The DEIS should incorporate a more explicit explanation of the intersections that fail hot spot analyses and what that signifies.

Response: As discussed in FEIS Section 3.6.3.2, no intersections failed the PM Hot-Spot Analysis, and there are no associated potentially significant adverse impacts to local air quality anticipated.

Air Quality Comment 6:

Assuming that the DEIS NAAQS compliance analysis is correct, modeled levels of both NOx and PM2.5 are very close to NAAQS limits. Given the uncertainty inherent in

modeling data, Micron should be required to keep a closer eye on the regional levels of these pollutants during construction and operation.

Response: USEPA monitors and reports regional ambient air quality and compliance with the NAAQS on an ongoing basis. The Title V air permit for the Proposed Project will also include emission limits to ensure that the Proposed Project will not cause or contribute to exceedances of the NAAQS in the region. In accordance with the requirements of its air permit, Micron will be required to monitor and report its emissions and compliance with the emission limits and requirements of its air permit. See also Responses to Air Quality Comments 1 and 4.

Air Quality Comment 7:

The DEIS must discuss Micron's PFAS air emissions, including those associated with F-gasses. The DEIS acknowledges that Micron will use and release fluorinated gasses (F-gasses), with almost 2.5 tons of projected "fluorides" emissions from fabs 1 and 2 alone. But the DEIS overlooks the fact that many F-gasses are themselves PFAS or PFAS-precursors, the adverse impacts of which extend far beyond their contribution to climate change.

Response: FEIS Chapters 3.6 and 3.7 detail the Proposed Project's anticipated emissions, proposed emission control measures, and applicable permitting requirements. To minimize and avoid impacts to air quality during operations, FEIS Section 3.6.6 details the best management practices, air pollution control devices and other measures that will be implemented to minimize and avoid potential impacts to air quality. Air permits issued by the NYSDEC will ensure that emissions are properly managed and do not pose a risk to public health.

Although there are no specific federal or state air quality standards for PFAS individually or as a group, all air pollutants (including PFAS) have been evaluated. Additionally, the Micron Campus is expected to be classified as a major source under the Prevention of Significant Deterioration (PSD) Program, requiring the implementation of Best Available Control Technology (BACT) for pollutants like carbon monoxide, nitrogen oxides, and fluorinated greenhouse gases (F-GHGs), some of which may be considered PFAS. These pollutants will be treated using controls like regenerative catalytic systems or POU thermal oxidizers with up to 99% destruction efficiency. FEIS Section 3.7.3.2 discusses potential emissions and emissions controls for fluorinated GHGs, including certain PFAS.

New York's air toxics program regulates non-criteria pollutants, including PFAS, using annual and short-term guideline concentrations developed based on best available science. Micron also plans to minimize fugitive emissions from heat transfer fluids and refrigerants through efficient design, monitoring, and maintenance. Additionally, the semiconductor industry is actively developing technologies to reduce PFAS emissions, including alternative chemistries, process optimization, and recycling systems. See FEIS Appendix L-1.

Air Quality Comment 8:

In the environment, most F-gasses degrade into trifluoroacetic acid (TFA), which is associated with developmental toxicity and liver and thyroid harm, and extremely difficult to control. DEIS fails to mention TFA.

Response: See Responses to Air Quality Comments 7 and 13. Emissions modeling for applicable individual fluorinated compounds (including directly-emitted F-GHGs and combustion byproducts) are presented in FEIS Appendix I-1 and demonstrate compliance with applicable federal and state requirements. Also, by implementing Best Available Control Technology (BACT) for GHGs, including F-GHGs (F-gases), Micron will minimize the amount of F-GHGs released into the atmosphere.

Air Quality Comment 9:

Micron must review the environmental impacts of incineration and consider the use of alternative technologies within the DEIS.

Response: As discussed in Micron's Air Permit Application, it is preferable to combust F-GHGs with natural gas rather than to release them directly to the atmosphere because: (1) PEECS are necessary to mitigate safety concerns (e.g. reactive and pyrophoric gases) associated with exhaust streams from thin films process tools, such that any CO₂ or CH₄ emissions are a necessary result of achieving important safety goals; and (2) the formation of CO₂ in POU control devices and RCS is a desirable outcome, because the GWP of CO₂ is significantly less than typical F-GHGs used in etching. Further, RCS and POU control devices can be used to treat F-GHGs at up to 99% destruction and removal efficiency for most compounds, according to the 2019 IPCC. See 2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories, V. 3 Industrial Processes and Product Use, Ch. 6 Electronics Industry Emissions (Rev. Nov. 2023).¹³ Incomplete oxidation of process chemicals are accounted for in the emissions estimates in the FEIS. As part of the NYSDEC permitting, alternatives and identified combustion-based control technologies have been addressed and identified in Micron's air permit application (as required through Best Available Control Technology (BACT) and Lowest Achievable Emission Rate (LAER) analyses). See also FEIS Appendix J-2. See also Response to Air Quality Comment 10.

Air Quality Comment 10:

Incineration of process gases with wet scrubbing is not 100% effective, making the DEIS estimate of GHGs too low; and it produces toxic products of incomplete combustion, and hydrogen fluoride. This causes toxic gases of unknown composition to be emitted into the community. The DEIS needs to be revised to assess the danger and health effects to humans and animals. Mitigation of these health risks could be accomplished by either replacing fluorinated gases with non-toxic degradable compounds or use an alternative control technology like wet oxidation.

¹³ https://www.ipcc-nggip.iges.or.jp/public/2019rf/pdf/3_Volume3/19R_V3_Ch06_Electronics.pdf.

Response: Devices that control air emissions have been evaluated in the FEIS and as part of the air permitting process. An analysis of the benefits and impacts of various control technologies, including centralized rotor concentrator thermal oxidizers (RCTOs) that achieve at least a 97% reduction of the VOC emissions, is included in FEIS Section 3.6. As discussed, thermal oxidation in point of use control devices and the use of a wet scrubbing system and process equipment exhaust conditioners (PEECs) are also used to control air emissions from semiconductor manufacturing facilities.

Information on products of incomplete combustion (PICs) are included in the FEIS as well as in Micron's air permit application. As indicated in FEIS Section 3.7.3.2, "emission chemicals [which may include products of incomplete combustion] may be generated in PEECs which manage exhaust from process tools for protection of equipment and personnel. In addition, POU control devices installed for removal of F-GHGs and centralized RCTOs installed for removal of volatile organic compounds (VOC) can generate emission chemicals. When these reactions occur, use of the primary chemical results in emissions of one or more emission chemicals that are not the primary chemical itself." Further, the control devices described above are designed specifically to target fluorinated chemicals in addition to particulates and acid gases, as opposed to control devices used in other manufacturing sectors designed only for particulate and/or acid gas control. The identified control technologies for fluorinated greenhouse gases are consistent with BACT. See response to Air Quality Comment 7 for further discussion on controls of PFAS-containing air emissions. See also Response to Air Quality Comment 9 on assessment of alternatives and air emissions controls.

Air Quality Comment 11:

Micron should be required to install air quality monitors for NAAQS pollutants and selected hazardous air pollutants (including HF, NF3, and total fluorides) in the airshed directly affected by the Micron facility.

Response: See Response to Onondaga Nation Comment 9. See also Responses to Air Quality Comments 1, 4, and 12. USEPA monitors and reports regional ambient air quality and compliance with the NAAQS thresholds. Micron will also be required to monitor and report facility emissions, including HAPs, criteria and non-criteria pollutants as part of its air permit to be issued by NYSDEC.

Air Quality Comment 12:

Commenters suggested that an independent, third-party natural resource monitor be employed for the site and vicinity to assess impacts on natural resources, including air quality. Long-term monitors should report to NYSDEC or Onondaga County.

Response: The Clean Air Act and New York State laws and regulations already require USEPA monitoring, assessment and reporting of ambient air quality and compliance with the NAAQS. NYSDEC air permitting requirements include emissions reporting and certification to ensure compliance with permit thresholds and regulatory limits. Site specific monitoring, recordkeeping, and reporting requirements will also be included in an air Title V permit to be issued by NYSDEC and will require air emission monitoring reports and certifications to be submitted to NYSDEC to ensure compliance with permit and regulatory thresholds and limits. USEPA and NYSDEC

maintain ongoing authority to monitor and ensure compliance with all air permit and applicable air quality requirements and compliance with the NAAQS, and deviations from permit requirements must be reported to NYSDEC.

Air Quality Comment 13:

Micron must contain and treat any chemicals their processes release into the air, including PFAS and greenhouse gases.

Response: FEIS Chapters 3.6 and 3.7 detail the Project's anticipated emissions, proposed emission control measures, and applicable permitting requirements. Air permits issued by the NYSDEC will ensure that emissions are properly managed and do not pose a risk to public health. As part of the permitting process, NYSDEC will also evaluate the Project's greenhouse gas emissions and include requirements for controls. FEIS Section 3.6.3.2 discusses proposed control technologies (e.g. thermal oxidation systems, various types of scrubbers). Details of the applicable control technologies, including monitoring, maintenance, and reporting requirements, will be detailed and included in an air Title V permit. The Title V permit review and issuance process will include maintenance, monitoring, reporting, and compliance requirements to ensure regulatory compliance and protection of human health.

Although there are no specific federal and state air quality standards for PFAS individually or as a group, all air pollutants (including PFAS) have been evaluated for the Proposed Project. See Responses to Nation Comment 11; Air Quality Comment 7; FEIS Appendix L-1. All process emissions will be routed to control systems with built-in redundancy to ensure safety and compliance. The Micron Campus is expected to be classified as a major source under the Prevention of Significant Deterioration (PSD) Program, requiring the implementation of Best Available Control Technology (BACT) for pollutants like carbon monoxide, nitrogen oxides, and fluorinated greenhouse gases (F-GHGs), some of which may be considered PFAS. These pollutants will be treated using controls like regenerative catalytic systems or POU thermal oxidizers with up to 99% destruction efficiency.

FEIS Section 3.7.3.2 discusses potential emissions and emissions controls for fluorinated GHGs, including certain PFAS. Air dispersion modeling for individual fluorinated compounds is presented in Appendix I, which confirms compliance with regulatory guidance concentrations for all applicable compounds. As discussed in FEIS Appendix L-1, New York's air toxics program regulates non-criteria pollutants, including PFAS, using annual and/or short-term guideline concentrations developed based on best available science. Micron also plans to minimize fugitive emissions from heat transfer fluids and refrigerants through efficient design, monitoring, and maintenance. Additionally, the semiconductor industry is actively developing technologies to reduce PFAS emissions, including alternative chemistries, process optimization, and recycling systems, which will be reflected in the Micron Campus's air permit.

Air Quality Comment 14:

The Air Quality section needs to add in discussions regarding the adverse effects and environmental impact on air of emissions exceedances, violations, upset conditions and other inadvertent releases to the atmosphere.

Response: NYSDEC air permitting requirements include mandatory emissions reporting, certification, and compliance monitoring to ensure that emissions remain within permitted thresholds and regulatory limits. Through this regulatory framework, the Proposed Project is subject to oversight designed to prevent, detect, and mitigate any adverse air quality impacts, thereby protecting public health and the environment.

Air Quality Comment 15:

What specific technologies and protocols will be implemented to monitor and control air emissions, especially hazardous air pollutants, from the manufacturing process and supporting facilities (e.g., bulk gas yards)?

Response: FEIS Section 3.6.3.2 discusses proposed air pollution control technologies (e.g., thermal oxidation systems, various types of scrubbers) that will control emissions from the manufacturing process and the facility. Details of the applicable control technologies, and their operation, including monitoring, maintenance, and reporting requirements, will be established by NYSDEC in the Title V permit.

Air Quality Comment 16:

How will Micron ensure air emission control measures are consistently effective in protecting local air quality. Micron should be required to monitor the regional levels of pollutants in the air during construction and operation.

Response: See Response to Onondaga Nation Comment 9. See also Responses to Air Quality Comments 1, 11, and 17. FEIS Section 3.6.3.2 discusses proposed control technologies (e.g., thermal oxidation systems, various types of scrubbers). Details of the applicable control technologies, including monitoring, maintenance, and reporting requirements, will be established by NYSDEC and included in the Title V permit to ensure compliance with regulatory requirements that are protective of human health. These control technologies must meet Best Available Control Technology (BACT), Lowest Achievable Emission Rate (LAER), and Maximum Achievable Control Technology (MACT) criteria. USEPA monitors and reports regional ambient air quality and compliance with NAAQS.

Air Quality Comment 17:

The DEIS does not state how Micron will minimize contamination of air. Rather than simply reciting the applicable legal standards and its intent to comply with those standards, Micron should be required to provide data on the pollution reduction that can be achieved via available air emission controls and assess the environmental impacts of the resulting emissions directly. Should provide more information on pollution reduction from air emission controls.

Response: See Responses to Air Quality Comments 9 and 15. FEIS Section 3.6 includes an assessment of the proposed emission control technologies, their efficacy and impacts, including thermal oxidation systems, point-of-use (POU) destruction systems, thin films Process Equipment Exhaust Conditioners (PEECs), centralized rotor concentrator thermal oxidizers (RCTOs), various types of scrubbers, and drift eliminators.

The Title V permit for the Micron Campus will also include additional details of the control technologies that will be required, including monitoring, maintenance, and reporting requirements. These control technologies will be subject to Best Available Control Technology (BACT) and Lowest Achievable Emission Rate (LAER) criteria, New Source Performance Standards (NSPS) and National Emission Standards for Hazardous Air Pollutants (NESHAPs) that require minimum control efficiencies, where applicable.

Air Quality Comment 18:

Concerns were expressed over the effect of dust on those living in immediate area. The DEIS should provide specific plans for dust control during construction.

Response: See Response to Air Quality Comment 1. FEIS Section 3.6.6 provides for the following BMPs to control the potential for fugitive dust emissions during construction activities:

- Use of water to control dust during demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands.
- Application of other substrates besides water for dust control as needed.
- Installation and use of hoods, fans and fabric filters or similar systems to enclose and vent dusty materials.
- Adequate containment methods are employed during sandblasting or other operations.
- Covering open-bodied trucks transporting materials likely to generate airborne dusts.

Air Quality Comment 19:

A commenter expressed concern about how a derailment containing chemicals to be used at the facility would impact the air quality for immediate communities.

Response: Micron will not use rail to transport hazardous materials. See FEIS Section 2.1.2.3. See also Response to Solid Waste and Hazardous Materials Comment 27.

Air Quality Comment 20:

Cumulative impacts of air pollution are not sufficiently addressed. DEIS does not sufficiently address cumulative exposure analysis, including hazardous air pollutants (HAPs) under Clean Air Act thresholds.

Response: See Responses to Air Quality Comments 1, 4, and 6. FEIS Chapter 3.6 includes a comprehensive analysis of emissions from both the construction and operation phases of the Project, including criteria pollutants (e.g., VOCs, particulate matter), HAPs and regulated non-

criteria pollutants from stationary and mobile sources. These emissions were evaluated in relation to Clean Air Act and New York State regulatory thresholds and health-protective guidelines. The air dispersion modeling discussed in Chapter 3.6 and Appendix I also included an analysis of cumulative impacts, from the Project as well as other area emission sources. In addition, FEIS Section 4.3.6 analyzes cumulative impacts, including reasonably foreseeable actions and regional trends that could contribute to increased air emissions. Based on this comprehensive assessment, cumulative air quality impacts are not anticipated to be significant.

Air Quality Comment 21:

The public has a right to understand long-term exposure risks, particularly for children, elderly residents, and immunocompromised individuals in nearby residential zones.

Response: See Responses to Air Quality Comments 1-3. FEIS Chapter 3.6 presents an analysis of Project-associated emissions for both construction and operation phases, including for criteria pollutants (e.g., VOCs, particulates), HAPs and regulated non-criteria pollutants, for both stationary and mobile sources. This analysis is in the context of Clean Air Act NAAQS thresholds and New York State's regulatory guideline concentrations established to be protective of human health, considering short-term and long-term exposures. The NAAQS specify the ambient concentrations of criteria pollutants to which the public can be exposed without adverse health effects and are designed to protect those segments of the public most susceptible to respiratory distress, including people with asthma, chronic obstructive pulmonary disease, or other lung diseases, as well as very young people, elderly people, and people engaged in strenuous work or exercise. The New York State annual and short-term guideline concentration requirements associated with non-criteria pollutants also consider sensitive populations such as children and the elderly.

Air Quality Comment 22:

Micron needs to adhere to state and federal requirements associated with hazardous chemicals, including risk management plan (RMP) requirements.

Response: FEIS Section 3.8 includes a discussion and analysis of the federal requirements associated with hazardous chemicals, including RMP requirements, and how the Project will comply with these requirements. The FEIS explains that Micron will be required to develop an RMP for regulated flammable and toxic "extremely hazardous substances" above applicable threshold quantities (40 CFR § 68.130) that would be used in covered on-site processes. Pending further review based on evolving Micron Campus designs, Micron would expect the RMP to cover eight regulated chemicals (ammonium hydroxide, anhydrous ammonia, hydrogen, hydrogen chloride, silane, chlorine, dichlorosilane, and HF) and would evaluate and add additional chemicals to the RMP on a case-by-case basis.

FEIS Table 3.9-2 also describes process hazards and discusses measures such as pre-task planning (PTP), job hazard analyses (JHA), permit-to-work (PTW), critical risk checklists, and PPE. Micron EHS professionals will be responsible for conducting risk assessment reviews consistent with the PTP, JHA, and PTW procedures. These measures would be applied across the fabs consistent with the NIOSH hierarchy of controls. See also Responses to Solid Waste and Hazardous Materials Comments 4 and 48.

Air Quality Comment 23:

What assurances do residents that live in Clay have that issues with foul odor and smells will not happen here.

Response: Micron will be required to comply with all applicable federal, state and local laws with respect to air emissions that may cause odors, including 6 NYCRR 211.1 and the Town of Clay Zoning Code Section 230-17(6). These laws prohibit odors that are a nuisance or unreasonably interfere with the comfortable enjoyment of life or property.

Micron also conducted air modeling, including hydrogen sulfide emissions that can cause odors (e.g., rotten egg smell). Modeled hydrogen sulfide concentrations are presented in FEIS Table 3.6-11. The modeling showed that emissions of hydrogen sulfide from the facility are not expected to result in foul offsite odors.

Air Quality Comment 24:

A commenter recommended that Micron explore an alternative approach to controlling F-gases: low-temperature condensation of the gases, followed by destruction using advanced technology such as super critical wet oxidation.

Response: See Responses to Air Quality Comments 1, 7, 8, 10, 13, and 17. Emissions modeling for applicable individual fluorinated compounds are presented in FEIS Appendix I-1, demonstrating compliance with applicable guidance concentrations. FEIS Section 3.6.3.2 discusses proposed control technologies (e.g. thermal oxidation systems, various types of scrubbers). Details of the applicable control technologies, including monitoring, maintenance, and reporting requirements, will be established by NYSDEC and included in Micron's Title V air permit based on NYSDEC's review and analysis of Micron's air permit application, and emission control requirements. The Title V permit will include maintenance, monitoring, reporting, and compliance requirements to ensure regulatory compliance and protection of human health.

Air Quality Comment 25:

Mitigation measures for construction equipment should include best available control technology as feasible in contract specifications to reduce emissions during construction.

Response: FEIS Section 3.6.6 identifies the following BMPs to be used in minimizing equipment-related emissions, which include:

- Limit idling of vehicles and equipment engines to no more than 5 minutes when not in use.
- Use construction equipment equipped with Tier 4 engines.
- Use cleaner burning fuel (renewable diesel, natural gas) or electric vehicles and equipment when feasible.
- Use only low sulfur diesel fuel in relevant equipment and emergency generators.

Air Quality Comment 26:

The DEIS must consider and impose mitigation measures to address PFAS air emissions in permits.

Response: See Responses to Air Quality Comments 7 and 13. PFAS-containing emissions from the Proposed Project are not anticipated to be significant due to project design, compliance with NYSDEC's air toxics program, Title V permit conditions, and CLCPA requirements, as well as the implementation of BMPs. No additional mitigation is therefore required.

Air Quality Comment 27:

To mitigate air pollution impacts, Micron should segregate all waste materials made with fluoropolymers and not allow them to be incinerated. It would be best to find a way to recycle this material.

Response: See Responses to Solid Waste and Hazardous Materials Comment 65 and Air Quality Comment 26. See also FEIS Appendix L-1. Recognizing that there is no one-size-fits-all technology or treatment program for PFAS-containing waste material, Micron through its RRR Program will implement feasible, practicable, and necessary measures to reuse, recycle, and recover materials or waste generated at the facility. To the extent that waste cannot be reused or recycled, it may be collected via licensed private haulers for transport to permitted private facilities authorized to receive the waste (FEIS Sec. 3.8.3.2) or transported to authorized off-site incineration facilities for energy recovery or for other RRR activities. USEPA has identified incineration of PFAS-containing material as "a viable PFAS destruction technology if done under certain conditions," and further describes that use of "temperatures above approximately 1,100°C / 2,012°F may result in high destruction efficiencies and few detectable fluorinated products of incomplete combustion." See USEPA "Interim Guidance on the Destruction and Disposal of Perfluoroalkyl and Polyfluoroalkyl Substances and Materials Containing Perfluoroalkyl and Polyfluoroalkyl Substances," V.2. <https://www.epa.gov/system/files/documents/2024-04/2024-interim-guidance-on-pfas-destruction-and-disposal.pdf>.

Air Quality Comment 28:

The DEIS does not say how Micron's Risk Management Plan will be made accessible. It is also unclear whether PFAS or emerging contaminants will be included in the RMP. Micron's RMP should include all chemicals that it internally identifies as hazardous.

Response: See Response to Air Quality Comment 22. Micron's Risk Management Plan (RMP) will address those chemicals regulated as "extremely hazardous substances" that are used in covered processes in quantities above threshold levels. At this time, PFAS and unidentified emerging contaminants are not subject to USEPA's Risk Management Program regulations. Micron's RMP will be accessible through the USEPA's Risk Management Program website (<https://www.epa.gov/rmp/how-access-risk-management-plan-information>) or by contacting the local Emergency Planning Committee (LEPC) when applicable and available during the operational phase of the Project.

Air Quality Comment 29:

Toxic chemicals from chips must not pollute the air.

Response: See Response to Air Quality Comment 1. USEPA monitors and reports regional ambient air quality. FEIS Chapter 3.6 presents a comprehensive analysis of Proposed Project-related emissions for both construction and operation phases, including emissions for criteria pollutants (e.g., VOCs, particulates), HAPs and regulated non-criteria pollutants, for both stationary and mobile sources, in the context of Clean Air Act and New York State regulatory thresholds and guideline concentrations protective of human health. The Micron Campus will be subject to a Title V air permit, which will include air emission limits, controls, standards, monitoring and reporting requirements to ensure the facility does not cause or contribute to ambient air exceeding concentrations protective of human health.

Air Quality Comment 30:

Burning natural gas will result in poor air quality for the area - and we already have poor air quality.

Response: See Response to Air Quality Comment 1. USEPA monitors and reports regional ambient air quality. FEIS Chapter 3.6 includes a detailed analysis of current ambient air quality, which meets the NAAQS, and emissions from both the construction and operation phases of the Proposed Project, including those associated with natural gas combustion. Emissions were evaluated against health-based thresholds and guidance concentrations established under the Clean Air Act and New York State requirements that ensure protection of public health. As demonstrated in the FEIS and in the Micron Campus' air permit application, the Proposed Project will not cause or contribute to an exceedance of the NAAQS.

Air Quality Comment 31

The DEIS assesses construction and operation emissions separately, yet there will be both construction and operations emissions between 2029 and 2041 so the cumulative effects of both construction and operations need to be considered for the coincident time periods and presented in the Final EIS.

Response: FEIS Chapter 3.6 evaluates construction and operational emissions separately to align with established environmental review practices and regulatory permitting frameworks. This approach reflects the distinct characteristics of each phase and allows for accurate analysis and modeling of emissions, comparisons to regulatory thresholds like NAAQS, SGCs and AGCs, and mitigation strategies appropriate for each phase. However, while FEIS Chapter 3.6 presents these analyses separately, FEIS Section 3.6.3.2 also includes cumulative air quality assessments, which consider overlapping emissions from both mobile and stationary sources. These cumulative analyses incorporate traffic growth, regional development, and technological improvements expected over time.

3.7 Climate Change & Greenhouse Gas Emissions

Climate Change/GHG Comment 1:

The project will be a new source of and increase to greenhouse gas and carbon emissions.

Response: FEIS Chapter 3.7 includes a detailed assessment of the GHGs associated with the Proposed Project and alternatives, including (1) direct emissions, which arise from the manufacturing process and stationary combustion that supports the manufacturing process (referred to as Scope 1); (2) indirect emissions, which arise from purchase of offsite fossil fuel generated electricity (referred to as Scope 2); and (3) indirect emissions, which result from the activities upstream and downstream of Micron's operations (referred to as Scope 3), analyzed in relation to federal and State regulatory frameworks. When compared to pre-mitigation GHG emissions, Micron will avoid approximately 77 percent of potential GHG emissions due to project design components, direct process emissions control measures, BMPs, and mitigation measures.

Climate Change/GHG Comment 2:

The amount of water and electricity required will contribute to all types of climate change issues.

Response: See also Response to Climate Change/GHG Comment 1. FEIS Chapter 3.7 includes a discussion of how greenhouse gases (GHGs) impact climate change, the effects of climate change, and an assessment of GHGs associated with the Proposed Project. As discussed in FEIS Chapter 3.7, the effects of climate change are driven by the combined emissions from various sources across the globe, rather than from any single event or emission. Each contribution, whether large or small, adds to the overall warming of the planet. As such, when assessing the impact of a specific project, like the Proposed Project, it is essential to consider how its emissions across alternative scenarios (including a scenario with no project) fit in relevant context into broader global and regional emissions, its contribution to the ongoing accumulation of GHGs in the atmosphere, and how the project and alternatives may impact climate commitments and goals.

FEIS Chapter 3.7 assesses the GHGs associated with the Project, including (1) direct emissions, which arise from the manufacturing process and stationary combustion that supports the manufacturing process (referred to as Scope 1); (2) indirect emissions, which arise from purchase of offsite fossil fuel generated electricity (referred to as Scope 2); and (3) indirect emissions, which result from the activities upstream and downstream of Micron's operations (referred to as Scope 3). NYSDEC has also assessed GHG emissions and climate change impacts as part of its review of the Micron Project under the CLCPA. See FEIS Appendix J-2.

Climate Change/GHG Comment 3:

The project will put unnecessary carbon emissions into our atmosphere.

Response: FEIS Chapter 1.1 details the purpose and need for the Proposed Project, including that (1) manufacture semiconductors is necessary to address gaps and vulnerabilities in the domestic

supply chain across a diverse range of technology and process nodes; and (2) to provide a secure supply of semiconductors necessary for the national security, manufacturing, critical infrastructure, and technology leadership of the U.S. and other essential elements of the economy of the U.S. See also Response to Climate Change/GHG Comments 1 and 2; Response to Purpose and Need Comments 2.

Climate Change/GHG Comment 4:

Semiconductor manufacturing uses chemicals and fluorinated gases that can be 17,000 times CO₂.

Response: FEIS Section 3.7.3.2 quantifies GHG emissions from all manufacturing operations, including fluorinated GHGs. Of note, point-of-use and other control devices will be utilized to remove fluorinated GHGs from emissions streams thereby significantly reducing the carbon dioxide equivalent (CO₂e) emissions.

Climate Change/GHG Comment 5:

Commenter is supportive of Micron's project in Clay because it will avoid approximately 77% of potential greenhouse gas emissions by adhering to New York's climate protection laws. In addition, more than 86% of the electricity used at the site will be generated from carbon-free energy sources. Locating the project elsewhere would risk significantly more carbon emissions and fewer environmental protections.

Response: Comment noted.

Climate Change/GHG Comment 6:

An analysis needs to be conducted of the true scope of GHG emissions, including construction, energy purchased, upstream and downstream emissions.

Response: See Responses to Climate Change/GHG Comments 1 and 2. FEIS Chapter 3.7 assesses Scope 1, 2 and 3 GHG emissions comprehensively, including all project phases, purchased energy, upstream and downstream emissions, and induced growth.

Climate Change/GHG Comment 7:

The GHG assessment should be repeated using a 5-mile radius.

Response: See Responses to Climate Change/GHG Comments 1 and 2. FEIS Chapter 3.7 evaluates climate change impacts associated with all aspects of the Project irrespective of geographic boundaries. As also noted in FEIS Chapter 3.7, the effects of climate change are driven by the combined emissions from various sources across the globe, rather than from any single event or emission, or in any particular geographic area. Each contribution, whether large or small and regardless of the geographic area, adds to the overall warming of the planet.

Climate Change/GHG Comment 8:

The analysis did not include the anticipated carbon footprint of construction. The proposed construction project will significantly increase GHG emissions, yet the DEIS incorrectly states that these impacts are not “reasonably foreseeable” and insufficiently discloses GHG emissions and air pollutants from construction materials, known as Scope 3 greenhouse gas emissions. Failing to disclose the GHG emissions associated with construction of the facility, significantly impairs the ability to determine if this project is in the public interest or is adequately mitigating impacts.

Response: Construction-associated GHG emissions are evaluated in detail and quantified to the extent practicable in FEIS Section 3.7.3.2. As further discussed in FEIS Chapter 3.7, upstream construction material lifecycle emissions have not been quantified due to variability and uncertainty in the future potential range of product designs and uses. Notwithstanding, the FEIS provides sufficient information on the Proposed Project’s construction related GHG emissions.

Climate Change/GHG Comment 9:

Appendix J, Greenhouse Gas Emissions, Climate Change, and Climate Resiliency, only accounts for part of Scope 1 emissions.

Response: FEIS Chapter 3.7 evaluates all reasonably quantifiable Scope 1 (direct) GHG emissions associated with various aspects of the Project, including construction and operation. Direct GHGs would be emitted during construction and as a result of manufacturing processes, from oxidation of organic compounds in thermal oxidation systems and Rotary Concentrator Thermal Oxidizers from the combustion of natural gas and diesel. A summary of total GHG that would be emitted by each process is included in Tables 3.7-10 and Table 3.7-11; and, construction emissions are summarized in Table 3.7-6. GHG emissions control measures and best management practices (BMPs) as proposed for Micron’s GHG BACT analysis for its air permit are also included in Appendix J-1 as supplementary material to support the analysis completed in FEIS Chapter 3.7.

Climate Change/GHG Comment 10:

To calculate Scope 2 (indirect) GHG emissions, marginal emission rates must be utilized and will produce results that are multiple times higher than Micron estimates.

Response: Per EPA’s eGRID Technical guidance, “while nonbaseload rates can be used to estimate the emissions reductions associated with projects that displace electricity generation, such as energy efficiency and/or renewable energy, these rates should not be used for assigning an emission value for electricity use in carbon-footprinting exercises or GHG emissions inventory efforts. Rather, eGRID subregion-level total output emission rates are recommended for estimating emissions associated with electricity use (scope 2 emissions).”

Climate Change/GHG Comment 11:

The DEIS must include an analysis of GHG emissions from construction activities, known as Scope 3 greenhouse gas emissions, and concrete and steel procurement must

require a commitment to reduce the concrete GHG levels 50% below Northeast average and steel for primary and secondary processes both 25% below industry values.

Response: See Response to Climate Change/GHG Comment 8. FEIS Section 3.7.3.2 provides all reasonably quantifiable Scope 1, 2, and 3 GHG emissions associated with construction activities. Per Section 3.7.3.2, there are potential upstream and/or downstream emissions associated with the Project (e.g., upstream construction and manufacturing material inputs, product end uses and lifecycle, etc.) which are not reasonably foreseeable, or readily quantifiable.

Micron has committed to explore using recycled steel where feasible. Micron plans to target greater than 75% recycled content in rebar and 90% recycled content in structural steel. These targets are documented in internal Environmental Product Declarations that are then used as inputs into the contracting process. Carbon-free steel is not part of the plans at this time. Actual recycled content will be determined as Micron proceeds through the contracting process. Micron works with suppliers, such as steel mills, as a member of the CDP Supply Chain program and Micron collaborates with suppliers around their GHG emissions-reduction programs and other initiatives that contribute to supply chain sustainability. According to Micron, it annually reports scope 3 emissions through CDP and analyzes the sources of the value chain emissions for potential reduction opportunities.

Micron has also committed to achieving Gold LEED status for all fabs and commercially reasonable efforts to achieve Platinum LEED status for all office buildings. See FEIS Section 3.6.7.

Climate Change/GHG Comment 12:

The project will use highly carbon polluting concrete. Micron should utilize carbon-negative and carbon-neutral concrete and recycled steel where feasible.

Response: See Response to Climate Change/GHG Comments 8 and 11.

Climate Change/GHG Comment 13:

What are the GHG emissions and impact on climate associated with filling parking spaces?

Response: Mobile-source GHG emissions including from Proposed Project-associated traffic are quantified in FEIS Section 3.7.3.2. See also Response to Climate Change/GHG Comments 15, 30, 31, and 48 related to loss of green space and wetlands.

Climate Change/GHG Comment 14:

Commenters expressed concerns that the project does not comply with the CLCPA; greenhouse gases from the project will interfere with meeting CLCPA goals.

Response: Pursuant to Section 7(2) of the Climate Leadership and Community Protection Act (CLCPA), and discussed in FEIS Section 3.7.1.3, NYSDEC will review Micron's CLCPA analysis as part of its processing of NYSDEC permits and determine whether the Proposed Project would

be inconsistent with or interfere with the attainment of the statewide GHG emission limits in ECL Article 75, and if NYSDEC determines that it would, whether it is otherwise justified and determine feasible mitigation measures to be imposed. See also FEIS Appendix J-2.

Climate Change/GHG Comment 15:

The Project will have indirect global warming effects from loss of green space.

Response: The lead agencies acknowledge these potential indirect effects which have been addressed by NYSDEC under the CLCPA (see FEIS Appendix J-2). See also Responses to Climate Change/GHG Comments 14, 30, 31, and 48.

Climate Change/GHG Comment 16:

The Project should provide a renewable energy procurement plan prioritizing new renewable capacity rather than existing RECs; evaluate rooftop solar, solar windows, geothermal, and waste heat recovery potential; utilize carbon-negative and carbon-neutral concrete and recycled steel where feasible; document how LEED- inspired strategies (e.g., low-emitting materials, advanced ventilation, daylighting where feasible, renewable energy integration) adapted to the unique requirements of semiconductor manufacturing. Micron should be required to assess many forms of renewable energy generation and provide binding commitments.

Response: As discussed in FEIS Section 3.7.6, Micron has committed to purchasing 100 percent carbon-free electricity utilizing power purchase agreements and renewable energy credits for the power consumption of the Micron Campus, thus avoiding up to approximately 2.4 MMT of CO₂e.

Micron has evaluated and tested placing solar panels on different types of buildings. However, the Fab has specifications surrounding vibration and other requirements that may inhibit placing solar panels on the Fabs. Other buildings like warehouses or administrative offices are more viable location options. Based on Micron's evaluations of available rooftop locations, solar panels would have a system capacity of ~4MW. Figure 3.10-3 shows current planned installation locations, including the roofs of the parking garages, wastewater treatment facilities, and BIO buildings.

Table 3.7-13 and Table 3.7-14 summarize the anticipated Proposed Project's GHG reduction measures. These measures include a host of strategies, including where feasible: process and design related measures, EV charging stations, shuttle buses, using alternative lower GHG process gases, operating abatement equipment, achieving Gold LEED status for all office buildings, installation of on-site renewable generation, optimizing processes, using energy efficient heating, ventilation and air conditioning, and use of light-emitting diode fixtures. When compared to pre-mitigation GHG emissions, Micron will avoid approximately 77 percent of potential GHG emissions due to these project design components, direct process emissions control measures, best management practices (BMPs), and mitigation measures.

As part of the permitting process, NYSDEC will also be reviewing Micron's CLCPA Analysis and may require additional or revised climate-related mitigation measures. A copy of the CLCPA analysis is included as Appendix J-2 of the FEIS. See also Response to Climate Change/GHG

Comment 14. Additionally, the New York State Green CHIPS Act requires program participants to include sustainability measures to mitigate the project's GHG emissions impact. N.Y. Econ. Dev. L. § 352(24)(b). The Green CHIPS Act does not dictate the purchase of wind or solar energy, or prohibit the purchase of renewable energy credits. Micron's Green CHIPS application will include proposed sustainability measures which will be updated through annual reporting under the Green CHIPS program.

Climate Change/GHG Comment 17:

Micron should commit to 24/7 carbon-free electricity through PPAs with new renewable sources combined with battery storage; include demand flexibility strategy to reduce fossil fuel use during peak, and disclose GHG emissions from grid buildout and embedded emissions from construction and development.

Response: See Responses to Climate Change/GHG Comments 14 and 16.

Climate Change/GHG Comment 18:

Micron's proposed use of unbundled RECs to mitigate greenhouse gas emissions from the facility's operations fails to address or ameliorate the facility's adverse impacts on achievement of New York's renewable energy mandates. Must generate or purchase new renewable energy without relying on RECs.

Response: See Responses to Climate Change/GHG Comments 14, 16, and 18. As discussed in FEIS Chapter 3.7, Micron has committed to 100% carbon free electricity through power purchase agreements and renewable energy credits. Micron has also committed to working with New York State entities including the New York Power Authority (NYPA), Empire State Development (ESD), and the New York State Energy Research Development Authority (NYSERDA) to identify reasonably feasible opportunities to procure and/or support new renewable or carbon-free electricity projects in New York, and is also reviewing opportunities for 24/7 and/or time-matched carbon-free electricity, aligned with New York's Clean Energy Standard (CES) and global Scope 2 accounting standards.

Climate Change/GHG Comment 19:

DEIS claims that the company will mitigate 2.4 million tons of CO₂e through the purchase of renewable electricity, but provides no procurement guidelines and fails to acknowledge the limitations of renewable energy credits. Unless it creates renewable energy, Micron will cause a release of huge amounts of carbon dioxide from energy generation.

Response: See Responses to Climate Change/GHG Comments 14, 16, and 18. Micron will utilize a combination of measures, including on-site renewable energy generation and the purchase of 100 percent carbon-free electricity utilizing power purchase agreements and renewable energy credits for the power consumption of the Micron Campus.

Climate Change/GHG Comment 20:

Micron must create a comprehensive plan to generate or purchase renewable energy. The DEIS does not state how Micron will meet its own goals for the facility to be powered by 100% renewable energy. The plans for use of renewable energy falls short of the requirements of the Green Chips Act and Micron's own goals. Micron should prioritize renewable energy sources that are safe and rapidly deployable. Clarify whether Micron's commitments are to carbon-free or renewable energy.

Response: See Responses to Climate Change/GHG Comments 14, 16, and 18.

Climate Change/GHG Comment 21:

As part of GREEN CHIPS legislation which is funding Micron, they are required to achieve 100% renewable energy for electricity use. The DEIS is vague on the source of renewable energy, listing solar on some buildings. Commenter is concerned that the Micron Proposed Project plans to draw from existing hydro, solar, wind, and nuclear sources. These energy sources are barely adequate to support existing developments and communities.

Response: See Responses to Climate Change/GHG Comments 14, 16, and 18. Micron plans to utilize a combination of measures, including on-site renewable energy generation and the purchase of 100 percent carbon-free electricity utilizing power purchase agreements and renewable energy credits for the power consumption of the Micron Campus, throughout the construction and operation of the Proposed Project.

Climate Change/GHG Comment 22:

The scale of renewable generation in the form of 4 MW solar is not sufficient. Is Micron actively exploring on-site renewable energy generation beyond the proposed rooftop solar panels?

Response: See Responses to Climate Change/GHG Comments 14, 16, and 21. Micron will continue to evaluate the practicability of additional on-site renewable energy generation and incorporating new clean energy technologies as they develop and as construction of the Proposed Project progresses over the next 16 years.

Climate Change/GHG Comment 23:

The FEIS should include an option for an on-site combined cycle gas turbine plant with co-generation and agricultural park option to reduce GHG emissions.

Response: See Responses to Climate Change/GHG Comments 14, 16, and 21. Micron plans to utilize a combination of measures to reduce GHG emissions associated with power, including on-site renewable energy generation and the purchase of 100 percent carbon-free electricity utilizing power purchase agreements and renewable energy credits for the power consumption of the

Micron Campus. As part of New York State's Green CHIPS legislation, Micron is not able to construct and operate a new on-site natural gas turbine plant.

Climate Change/GHG Comment 24:

The DEIS does not state how the project's enormous greenhouse gas emissions will be substantially mitigated.

Response: See Responses to Climate Change/GHG Comments 14, 16, and 21. FEIS Section 3.7.6, including Table 3.7-13 and Table 3.7-14 detail the specific measures that will be used to reduce and mitigate GHG emissions. When compared to pre-mitigation GHG emissions, Micron avoids approximately 77 percent of potential GHG emissions due to project design components, direct process emissions control measures, BMPs, and mitigation measures. NYSDEC will also be reviewing Micron's CLCPA Analysis (see FEIS Appendix J-2) for consistency with New York State's ability to meet its statewide GHG emission limits and may require additional climate-related mitigation measures pursuant to the CLCPA.

Climate Change/GHG Comment 25:

The project should use construction materials that reduce GHG emissions and carbon footprints.

Response: See Responses to Climate Change/GHG Comment 8, 11, and 12.

Climate Change/GHG Comment 26:

The DEIS fails to identify the full scope of impacts the Micron plant's energy use would entail. The CO₂e rate for electric generation used by EIA is 3x more than used in the DEIS.

Response: As discussed in FEIS Section 3.7.3.2, New York State-specific GHG emissions factors used to calculate GHGs were sourced from USEPA's eGRID database to reflect the power generation profile available to the Proposed Project.

Climate Change/GHG Comment 27:

Local climate effects must be considered, including urban heat island effect, heat waves, storms, and their impact on surrounding communities.

Response: Local climate impacts (including heat island, weather events, groundwater impacts, etc.) are assessed in FEIS Section 3.7.4 *Climate Change and Resiliency*. See also FEIS Appendix J-2.

Climate Change/GHG Comment 28:

Concerns were raised regarding the footprint and facility design contributing to a heat island effect. Should the parking be stacked?

Response: The Proposed Project is likely to contribute to a localized heat island effect due to the changes in land use and construction of concrete, pavement, and other dark-colored impervious surfaces, and built environment consisting of building structures. A combination of stacked parking garage and surface parking will be utilized, which is described in Table 2.1-3 Plan Marker K. The capacity of the parking garage for each fab (2400) significantly exceeds the surface parking (500). See also FEIS Appendix J-2.

Climate Change/GHG Comment 29:

Project will cause increase in Vehicle Miles Travelled which will result in additional GHG emissions that need to be mitigated.

Response: Transportation-associated increases in GHG emissions are discussed in detail in FEIS Section 3.7.3.2. Scope 3 (Indirect) Emissions are discussed, which include the upstream and downstream impacts associated with transportation. The Proposed Project will incorporate traffic mitigation measures, subject to NYSDOT and FHWA's determination and evaluation of final traffic improvements to be implemented, which are detailed in FEIS Section 3.11. The GHG impacts of regional vehicle travel and mitigation measures are summarized in Table 3.7-12. FEIS Section 3.7.6 and Table 3.7-13 also detail additional measures to reduce and mitigate GHG emissions associated with the Proposed Project including the use of EV charging stations and operating shuttle buses. See also Responses to Climate Change/GHG Comments 14 and 16.

Climate Change/GHG Comment 30:

Increased flooding risks from loss of wetlands is exacerbated by climate change.

Response: FEIS Section 3.7.4 discusses climate change effects, including the potential for increased temperatures, more frequent and intense storm events, and flooding and stormwater concerns. A key factor in the selection of the Proposed Project site was its very low climate risk. Measures to enhance the Proposed Project's resilience to climate change effects are detailed in FEIS Section 3.7.4 and Appendix J-2.

Cumulative impacts with respect to wetlands, flooding, climate change, and climate resiliency are also discussed in FEIS Section 4.2.7.3. As further discussed in Section 3.3, the loss of wetlands associated with the Proposed Project will require compensatory mitigation requirements to offset the loss of wetlands from the Proposed Project by creating and preserving wetlands (at a ratio of two acres or greater of created wetlands to each acre that is lost) within the watershed of the Proposed Project.

Climate Change/GHG Comment 31:

Destruction of wetlands will result in the loss of a carbon sequestration, which is not accounted for in the DEIS's evaluation of greenhouse gas emissions does not take into account the destruction of wetlands.

Response: As discussed in detail in FEIS Section 3.3, the loss of wetlands associated with the Proposed Project will require compensatory mitigation requirements to offset the loss of wetlands from the Proposed Project by creating and preserving wetlands (at a ratio of two acres or greater of created wetlands to each acre that is lost) within the watershed of the Proposed Project. See also FEIS Appendix J-2.

Climate Change/GHG Comment 32:

The DEIS does not consider the impacts of continuing and accelerating change in the climate from increased severity and length of high heat events, the increased flooding, erosion, and site drainage capacity required to deal with more and more severe storm events, and changes in water table height. While such climate effects cannot be accurately predicted, what consideration has been given to establishing a likely range of impacts and their respective offsets or mitigation?

Response: Section 17-b of the Community Risk and Resiliency Act (CRRRA) requires certain permit applicants to consider the future physical risks that climate change poses to their proposed projects, and whether their projects significantly affect the climate resilience of public infrastructure or services, natural resources, private property, or natural resources in the vicinity of the project. See FEIS Chapter 3.7.4, Climate Change and Resiliency. Section 3.7.4 also discusses the anticipated climate change effects, including the potential for increased temperatures, more frequent and intense storm events, and associated flooding and stormwater concerns. A key factor in the selection of the Proposed Project site was its very low climate risk. Measures to enhance the Proposed Project's resilience to climate change effects are detailed in FEIS Section 3.7.4. See also FEIS Appendix J-2. Additionally, Micron's Business Continuity process ensures that infrastructure is designed and constructed to withstand risks such as climate change and to re-evaluate those risks on a regular basis so appropriate action can be taken.

Climate Change/GHG Comment 33:

The DEIS does not address the carbon footprint of developing the residential and commercial infrastructure necessary for the Project, in addition to the miles of new roads and utility lines, and does not include any mitigation. The carbon footprint of the induced residential and commercial development should be accounted for and mitigation required.

Response: Additional GHG emissions resulting from the development of residential and commercial infrastructure are discussed in FEIS Section 3.7.5, Growth Inducing Effects. As these activities would be subject to state climate and resiliency requirements and would be supported by a grid powered increasingly by renewable energy, induced growth is not anticipated to have a significant adverse effect on GHG emissions or climate resiliency.

Climate Change/GHG Comment 34:

There is not enough information on how Micron will reduce GHG emissions. How will the greenhouse gases released from wetland destruction be mitigated?

Response: See Responses to Climate Change/GHG Comments 14, 16, 30, and 31. See also FEIS Appendix J-2.

Climate Change/GHG Comment 35:

Should provide alternatives such as construction of renewable energy for GHG mitigation.

Response: See Responses to Climate Change/GHG Comments 14 and 16.

Climate Change/GHG Comment 36:

Traffic planning should be used to reduce CO2 emissions.

Response: See Response to Climate Change/GHG Comment 29.

Climate Change/GHG Comment 37:

BMPs for GHGs should become enforceable permit conditions.

Response: The lead agencies will require implementation of BMPs. In addition, proposed GHG emissions control measures will be required by NYSDEC in its Micron Campus' Title V air permit.

Climate Change/GHG Comment 38:

Micron should replace trees with other trees that have the same environmental carbon capture value.

Response: While not listed as a mitigation measure with regard to climate change, tree plantings are a component of the Proposed Project design at the Micron Campus and several connected action locations. See Response to Biological Resources Comment 58; Responses to Climate Change/GHG Comments 30 and 31.

Climate Change/GHG Comment 39:

Funds should be provided to replace each tree cleared because of carbon capture capability. Given the habitat value and carbon capture capabilities of trees that will be removed during plant construction, for each tree cleared, provide funds to Onondaga Earth Corps, Onondaga Audubon, CNY Land Trust, and/or other qualified not-for-profit initiatives to plant an equivalent number of 3-foot tall or so trees within Onondaga County and/or Oswego County in proportion to the types of trees to be removed.

Response: While not listed as a mitigation measure with regard to climate change, tree plantings are a component of the Proposed Project design at the Micron Campus and several connected

action locations. See Response to Biological Resources Comment 58; Response to Climate Change/GHG Comments 30 and 31.

Climate Change/GHG Comment 40:

The following should be required in the air permit: low carbon concrete; use of recycled steel processed in electric arc furnace.

Response: See Responses to Climate Change/GHG Comment 8, 11, and 12.

Climate Change/GHG Comment 41:

The project is required to meet LEED requirements and use renewable or alternative energy to reduce GHG emissions.

Response: Micron commitments to reduce and mitigate GHG emissions, including LEED standards, on-site solar electricity generation, and non-carbon electricity purchase, are detailed in FEIS Section 3.7.6 BMPs and Mitigation Measures.

Climate Change/GHG Comment 42:

The commenter supports Micron's commitment to achieving LEED Gold certification for all fabrication facilities and urges the company to go further by committing to LEED Platinum certification for all office and administrative buildings associated with the campus. Achieving LEED Platinum would not only align with New York State's climate mandates but would also set a strong precedent for responsible corporate development in the region.

Response: Comment noted.

Climate Change/GHG Comment 43:

Micron should document how LEED-inspired strategies (e.g., low-emitting materials, advanced ventilation, daylighting where feasible, renewable energy integration) will be adapted to the unique requirements of semiconductor manufacturing, and how LEED principals can be integrated into cleanroom and fab design, including measures to reduce toxic material use, improve indoor air quality, and recover/reuse process water.

Response: Micron has developed a comprehensive LEED program addressing aspects such as carbon, energy, water, waste, transportation, materials, health, and indoor environmental quality. Projects that register for and achieve LEED certification are considered public, and their details are listed on the U.S. Green Building Council's (USGBC) project directory. See FEIS Table 3.7-14; see also FEIS Appendix J-2.

Climate Change/GHG Comment 44:

Micron should provide a public report on LEED-equivalent performance metrics for the production facilities, even if formal LEED certification is not sought for those areas.

Response: As outlined in FEIS Table 3.7-14 (BMPs for GHGs and Climate Change), Micron will pursue Gold LEED certification for fabrication facilities and make commercially reasonable efforts to achieve Platinum LEED certification for office buildings.

Climate Change/GHG Comment 45:

No efforts appear to be made on electrification of industrial processes. Why can't the boilers and vaporizers be electrified?

Response: Micron has reduced natural gas heating requirements with heat-recovery in the Proposed Project design, and use of electric heaters where feasible. Micron has also evaluated the use of non-carbon-based heating solutions such as green hydrogen, but at this time, green hydrogen is not a feasible solution. In addition, as detailed in FEIS Section 3.7.6, Micron has committed to procuring 100% carbon-free electricity for the Project.

Micron has also assessed electrically heated water bath vaporizers, but they are not considered a feasible alternative to natural gas-fired units as electrically operated units would be unable to reach a required temperature quickly enough to satisfy the fab demand for vaporized nitrogen. Micron will use electric boilers to the extent feasible to meet the remainder of its heating demand, but would still need natural gas-fired boilers to be available on the coldest days of the year and in the event of a power loss. See also FEIS Appendix J-2.

Climate Change/GHG Comment 46:

Review the possibility of carport solar for all parking spaces as a renewable energy source on campus to reduce energy consumption, as well as the use of solar arrays on the roof or ground. The FEIS should include a detailed site-specific solar deployment plan. Micron should use gray water systems as much as possible.

Response: As provided in FEIS Table 2.1-3, Micron plans to install approximately 4 MW of solar panels on the rooftops of the parking garages and administrative buildings as part of its efforts to offset GHG emissions. The fab buildings cannot accommodate solar panels due to specifications related to vibration and other operational requirements that preclude installing solar panels on those rooftops. There is no space on the Micron Campus to install wind generation facilities.

The FEIS explains how Micron would work to minimize the carbon footprint of the Project, including on-site solar panel installation, on-site heat recovery, use of electric heaters, and a commitment to use 100% carbon-free energy for the Proposed Project.

Micron has evaluated the use of gray water systems as part of its commitment to achieve LEED certification on the campus buildings. Micron has committed to achieve 75% RRR in the short

term, and aspires to achieve 100% RRR, but it has indicated that after evaluation, gray water will not be used.

See also Responses to Climate Change/GHG Comments 14 and 16.

Climate Change/GHG Comment 47:

Establish an on-site anaerobic digester, or composting facility during Phase I. Having a facility on site will allow for immediate disposal of food waste and lessen hauling and generation of GHG emissions from hauling and landfills. If there is a composting facility, compost could be used on the landscape as part of mitigation. Anaerobic digestion could produce energy for the Proposed Action.

Response: The lead agencies acknowledge Micron's commitment to sustainability and expect Micron to continue to evaluate, and where practical and feasible, ways to reduce GHG emissions.

Climate Change/GHG Comment 48:

There should be a climate resiliency plan that considers details of all mitigation efforts related to loss of wetlands, including cascading effects to waterways/flooding, effects on GHG emissions.

Response: See Responses to Climate Change/GHG Comments 30 and 31. See also FEIS Appendix F. Mitigation of wetland disturbances is anticipated to be done at an average 2.2:1 rate, as required by USACE and NYSDEC. This would mean an average of twice as many wetlands will be built as were impacted. The lead agencies also note that Micron's CLCPA analysis describes and analyzes loss of carbon sequestration from wetlands destruction and details proposed mitigation measures that will be undertaken, as required by NYSDEC, to reduce GHG emissions. See FEIS Appendix J-2.

Climate Change/GHG Comment 49:

Micron should reassess GHG mitigation annually and after each phase and generate recommendations.

Response: See Responses to Climate Change/GHG Comments 14, 16, and 21. Micron has committed to continue to evaluate the practicability of additional on-site renewable energy generation as construction of the facility progresses over the next 16 years.

Climate Change/GHG Comment 50:

Should have an independent third party assess the Proposed Project for renewable energy source options and mitigation of Greenhouse Gas Emissions.

Response: Micron is required to submit a sustainability plan as part of its Green CHIPS application which will include renewable energy source options and GHG mitigations. Micron's Green CHIPS sustainability plan will be reviewed by an independent third party as part of ESD's Green CHIPS

program. In addition, Micron has partnered with a number of different third-party experts on renewable energy and reduction of emissions during the design phase.

Climate Change/GHG Comment 51:

GHG alternatives in the DEIS are speculative.

Response: GHG alternatives as assessed in the FEIS are included as components of Micron's air permit application GHG BACT analysis based on reasonable quantitative estimations and would become commitments and enforceable permit conditions that Micron would be required to comply with.

Climate Change/GHG Comment 52:

Micron should set short term and long term quantitative GHG reduction targets aligned with CLCPA.

Response: See Responses to Climate Change/GHG Comments 14 and 16.

Climate Change/GHG Comment 53:

To meet the goals of the CLCPA, require Micron to reduce and eventually phase out fossil fuel use as quickly as practicable and to produce or acquire its electric supply from renewable sources as soon as possible.

Response: See Responses to Climate Change/GHG Comments 14 and 16. It is preferable to combust F-GHGs with natural gas rather than to release them directly to the atmosphere because: (1) it mitigates safety concerns (e.g. reactive and pyrophoric gases) associated with exhaust streams from thin films process tools, such that any CO₂ or CH₄ emissions are a necessary result of achieving important safety goals; and (2) the formation of CO₂ in control devices and RCS is a desirable outcome, because the global warming potential of CO₂ is significantly less than typical F-GHGs that are used in etching. Incomplete oxidation of process chemicals is accounted for in the emissions estimates in the FEIS. See also FEIS Appendix J-2.

Climate Change/GHG Comment 54:

Micron should incorporate embodied carbon accounting into project decision-making with binding reduction goals using low-carbon materials and circular economy principles.

Response: See Responses to Climate Change/GHG Comments 8, 11, and 12. Micron has indicated that it will use low-carbon materials where feasible.

Climate Change/GHG Comment 55:

Mitigation should include BMPs to reduce and eliminate Scope 1, 2 and 3 GHG emissions and require periodic collaboration between Micron and agencies.

Response: See Responses to Climate Change/GHG Comments 14 and 16.

Climate Change/GHG Comment 56:

A mitigation plan with Smart growth principles should be used to minimize GHG emissions from residential and commercial development induced from the Proposed Project, powered solely by renewable, non-fossil fuel energy.

Response: Additional GHG emissions resulting from the development of residential and commercial infrastructure are discussed in FEIS Section 3.1.3.2 and 3.7.5 *Growth Inducing Effects*. Although induced growth from the Proposed Project may add to the region's climate impacts, any future development would be conducted under applicable State and local policies and programs, including CLCPA, CRRA, and the Smart Growth Public Infrastructure Policy Act, which establishes 11 smart-growth criteria for use by state and local agencies to help ensure that future planning and implementation of transportation, sewer and water treatment, water, education, housing, and publicly supported infrastructure, among other things, is resilient to a changing climate. Accordingly, it is anticipated that any induced growth associated with the Proposed Project would be undertaken with climate resiliency in mind, and that the growth would not significantly negatively affect the current climate resiliency of the region.

Climate Change/GHG Comment 57:

It is inaccurate to claim that purchasing renewable electricity will mitigate 100% of Scope 2 emissions. The facility will need electricity 24/7, matching electricity on an annual basis (instead of more gradual) is inaccurate and misleading. To deliver real Scope 2 emissions mitigation, Micron must commit to power its facilities using 24/7 hourly-matched carbon-free energy, prioritizing new renewable electricity and battery storage. This is the only approach that would meaningfully decarbonize the grid and avoid additional fossil fuel buildout.

Response: See Responses to Climate Change/GHG Comments 14, 16, 18, and 19. Micron is committed to the use of renewable energy. As provided in FEIS Section 3.7, Micron has committed to reducing its Scope 2 greenhouse gas emissions by purchasing 100 percent carbon-free electricity, aligned with current GHG Protocol Scope 2 Accounting standards. This will be achieved through power purchase agreements and renewable energy certificates, covering the full power consumption of the Micron Campus. This approach is expected to avoid up to approximately 2.4 million metric tons (MMT) of CO_{2e} emissions. Micron has also committed to installing on-site renewable energy systems to the extent practicable, further reducing Scope 2 emissions associated with the Proposed Project.

Climate Change/GHG Comment 58:

Micron should prioritize renewable energy and reject nuclear energy.

Response: Micron has committed to prioritizing the use of renewable energy. As discussed in FEIS Section 2, Table 2.1-3, and Section 3.7, Micron has designed the Proposed Project to minimize electricity demand, and plans to install approximately 4 megawatts of solar panels on the rooftops of the parking garages, wastewater treatment buildings, and biological treatment buildings. The fab buildings cannot accommodate solar panels due to specifications related to vibration and other operational requirements that preclude installing solar panels on the rooftops. Micron has also reviewed geothermal electricity generation at the Project site and has determined that this type of generation is not feasible with current existing available technology and site suitability. Micron remains committed to reviewing technological advancements for consideration as technology evolves.

The Proposed Project will be built out over the next 16 years and as construction and implementation progresses, Micron plans to partner with local stakeholders to secure 100% carbon-free energy for the Micron Campus and incorporate new clean energy technologies as they develop.

As explained in FEIS Section 3.10, neither Micron nor the lead agencies have jurisdiction over regional or statewide planning for future electricity demand or generation, nor do they control the type or location of future electricity generation facilities, including nuclear development. These responsibilities fall within the jurisdiction of separate state and regional electricity planning entities. However, pursuant to state laws and requirements, the state has a target of 100% zero carbon electricity by 2040.

See also Responses to Climate Change/GHG Comments 14, 16, and 57.

Climate Change/GHG Comment 59:

The state would need to contract for an additional 10,971 GWh of renewable energy—70% of Micron’s anticipated 15,673 GWh of demand—to comply with the state’s renewable energy mandates. Yet the DEIS fails to discuss or address the environmental impacts of this additional energy development burden.

Response: The FEIS evaluates the Proposed Project’s energy needs and the GHG emissions associated with the Proposed Project’s construction and operations. See FEIS Chapter 3.10.

To the extent that the comment requests an assessment of environmental impacts from new generation, this is beyond the scope of the FEIS. The need for additional generation is not reasonably foreseeable nor is the nature, location, timing, etc. of any such additional generation. Notwithstanding, any new generation will be required to obtain all necessary permits and approvals from the NYSDEC and, where applicable, the NYSPPSC, which will trigger an environmental review and CLCPA consistency analysis.

See also Response to Climate Change/GHG Comment 58.

Climate Change/GHG Comment 60:

There should be an analysis of the social cost of carbon.

Response: An analysis of the social cost of carbon in the FEIS is not necessary. Although NYSDEC has issued a guidance document, *Establishing a Value of Carbon*, associated with the social cost of carbon, as noted in the guidance, it is not appropriate or useful in all situations. The guidance specifically states that it does not establish a requirement on any public or private entity, and is therefore voluntary. Any social cost of carbon analysis or guidance is subject to a host of variables, and any attempt at defining the variables and calculating methods is difficult and can be miscalculated and/or lead to erroneous results. In addition, the NYSDEC social cost of carbon guidance is primarily based on federal guidance, models, and values, which are no longer used by federal agencies.

Climate Change/GHG Comment 61:

When GHG emissions occur that have a negative effect on climate change, what financial or other penalty will Micron incur?

Response: To the extent that Micron exceeds its permitted levels of GHG emissions, Micron would be subject to fines, penalties and corrective actions, and potentially other legal actions that involve fines and/or payments. See also Response to Climate Change/GHG Comment 7.

Climate Change/GHG Comment 62:

What specific, measurable metrics will be used to track progress towards the Green CHIPS reduction of GHG goals, and how will Micron ensure regular public reporting on these metrics?

Response: As discussed in FEIS Appendix D-3, Empire State Development (ESD) is responsible for implementing the Green CHIPS program and ensuring applicable goals and requirements of the Green CHIPS program are met. As part of the Green CHIPS program, Micron will provide annual reports to ESD detailing the performance of the project against the milestones and commitments of the Green CHIPS plans. It is expected that reports regarding status of the projects will be issued by ESD. Additional information on the Green CHIPS program can be found in the Excelsior Jobs Program Regulations (updated for Green CHIPS 3/28/2023).

Climate Change/GHG Comment 63:

If Micron plans to allow supply of electricity from nuclear power, it must revise the Term Sheet with Empire State Development, Onondaga County, and OCIDA. Additionally, if Micron is contemplating nuclear energy to power its chip fabrication facility, it must consider the time frame for nuclear development and interim power needs. The EIS must consider the additional environmental impacts that would entail.

Response: See Responses to Nation Comment 29 and Utilities Comment 12.

Climate Change/GHG Comment 64:

The DEIS must acknowledge the responsibility to avoid actions which may cause climate damage in the interest of protecting U.S. and NYS residents not only from the effects of climate change, but from legally justified damage assessments awarded by the international court of justice.

Response: Comment noted.

Climate Change/GHG Comment 65:

General Concerns were raised indicating that the long-term GHG impacts from increased traffic are not adequately addressed.

Response: FEIS Section 3.7 and Table 3.7-12 contain an analysis of GHG emissions associated with increased traffic and other mobile source emissions associated with the Proposed Project. The mobile source GHG analysis was performed in accordance with methodologies presented in NYSDOT guidance. The emission values in Table 3.7-12 represent fuel combustion for vehicle traffic on the regional road network during construction and operation in 2027 and 2031, and operational traffic at full build out in 2041. The traffic evaluation in 2041 includes three traffic mitigation scenarios discussed in detail in FEIS Chapter 3.11, Transportation and Traffic.

Climate Change/GHG Comment 66:

New York's Green Chips Act requires companies receiving NYS funding to power their semiconductor manufacturing with 100% renewable energy, achieve LEED Gold status for buildings, reduce greenhouse gas emissions, and return zero hazardous waste in landfills by 2030. There is no mention of these goals in Micron's DEIS.

Response: The Green CHIPS requirements, including related to GHG emissions and LEED, are included throughout the FEIS. FEIS Chapter 3.7, including Tables 3.7-13 and 3.7-14, detail Micron's commitment to purchasing 100% carbon-free electricity using power purchase agreements and renewable energy credits for the power consumption of the Micron Campus, avoiding 2.4 MMT of CO₂e. Table 3.7-14 further discusses that the Proposed Project will achieve Gold LEED status for all fabs and make commercially reasonable efforts to achieve Platinum LEED status for all office buildings. As detailed in Section 3.8.4, it is Micron's goal to achieve

95% reuse, recycling, and recovery of solid waste and near-zero hazardous waste-to-landfill of hazardous waste by 2030.

Climate Change/GHG Comment 67:

Given the unprecedented scale of energy consumption projected for this facility it is imperative that Micron implement the most aggressive energy efficiency strategies available. All operational systems, whether for manufacturing, cooling, lighting, or computing, must be adjusted for minimal energy intensity.

Response: As discussed in FEIS Chapter 2, Table 2.1-3, and Section 3.7, the Proposed Project has been designed to minimize electricity demand and maximize energy efficiency. As also discussed in FEIS Section 3.7 and Table 3.7-14, Micron will be required to achieve Gold LEED status for all fabs, and make commercially reasonable efforts to achieve Platinum LEED status for all office buildings. See also Responses to Climate Change/GHG Comments 14 and 16.

Climate Change/GHG Comment 68:

A commenter strongly urges the incorporation of a transparent, facility-wide Energy Management Plan that includes annual reporting and continuous performance improvement benchmarks aligned with the CLCPA.

Response: To the extent that the CLCPA may require such a plan, NYSDEC will make that determination. See Response to Climate Change/GHG Comment 14.

Climate Change/GHG Comment 69:

A commenter urged consideration that a qualified, independent third-party professional should be used to assess potential current and future renewable sources of energy available to Upstate New York compared to Micron's energy needs in Clay.

Response: See also Response to Climate Change/GHG Comment 50.

Climate Change/GHG Comment 70:

Micron committed to negotiating a Clean Energy and Sustainability Action Plan that will “at minimum” “require Micron to [u]tilize 100% renewable energy for electricity by 2025 in its New York Fab Complex operations, which may include but not necessarily be limited to the use of renewable energy credits, and maintain that renewable energy for electricity supply for the duration of the Term.” The DEIS, by contrast, explains that “Micron would commit to purchasing 100% carbon-free electricity utilizing power purchase agreements and renewable energy credits (RECs).” Explain this discrepancy.

Response: See Response to Nation Comment 34. Micron’s commitment to purchasing 100% carbon-free electricity is not limited to power purchase agreements and renewable energy credits (RECs) and additionally includes renewable and carbon-free electricity sourced from utility providers. See FEIS Section 3.10, Utilities and Supporting Infrastructure.

Climate Change/GHG Comment 71:

Are there plans to use a central abatement system at the plant, and to what degree will this be expected to lower GHG emissions? Provide details related to the life of the project.

Response: As discussed in FEIS Section 3.7.2.1, thermal oxidation is used in point-of-use control (POU) devices to control F-GHG emissions by thermally treating exhaust streams from process tools that utilize GHGs in semiconductor manufacturing facilities. Other semiconductor process tools often include process equipment exhaust conditioners (PEECs) as required safety equipment to manage process gases and may incidentally manage GHG emissions that are co-mingled materials. These control methods will significantly reduce GHG emissions from operations. The Project would also incorporate project design GHG reduction measures to control and reduce GHG emissions from the manufacturing process, and implement additional BMPs to further avoid and minimize GHG emissions during construction and operation. Process chemical substitution in semiconductor manufacturing affecting direct use of F-GHGs is the subject of ongoing research within the industry to utilize alternative methods or process chemicals with a lower GWP. Direct reduction and control of GHG emissions along with mitigation measures and alternatives are quantified and discussed in Micron's air permit application. See FEIS Section 3.7.6; FEIS Appendix J-2 (Micron's CLCPA Analysis).

Climate Change/GHG Comment 72:

Provide details on GHG emissions expected in the Town of Dewitt. Set up monitoring for repeat GHG emissions assessment at regular intervals as part of the Sustainability Plan to assess compliance and success of proposed actions.

Response: FEIS Section 3.7.3.2 includes a complete analysis of the potential GHG impacts from construction, operation, mobile and indirect sources. Micron will be required to monitor and report GHG emissions as required by its NYSDEC-issued air permit and any additional identified federal and state requirements as applicable. See also Response to Climate Change/GHG Comment 16 regarding reporting in Micron's Sustainability Plan.

3.8 Solid Waste and Hazardous Materials**Solid Waste and Hazardous Materials Comment 1:**

The DEIS relies on only legal compliance to support its finding of no significant impacts from solid waste and hazardous materials.

Response: The lead agencies' analysis in the FEIS is not based solely on compliance with applicable hazardous waste and hazardous materials regulations. Notwithstanding, the lead agencies did consider compliance with these laws, which are designed to ensure that the environment and public health and safety are protected. The lead agencies also consulted with the federal and state agencies with regulatory authority and expertise in solid waste, hazardous waste and hazardous materials during development of the FEIS to ensure that all potential and reasonably foreseeable impacts were considered and addressed in the FEIS. They then considered Micron's

avoidance and minimization efforts through the implementation of BMPs, including but not limited to Micron's RRR program, that are identified in FEIS Section 3.8. See Response to Nation Comment 7.

Solid Waste and Hazardous Materials Comment 2:

The DEIS does not address the long-standing threat caused by solvents used in production. A commenter noted that some companies are using alternatives to solvents.

Response: The FEIS considers the long-term use of chemicals and solvents. To the extent that the comment suggests that Micron should consider other alternative solvents, Micron is continuously evaluating the feasibility of alternatives for raw materials, such as solvents. As viable options are identified, Micron will implement those options to the extent that they are deemed feasible.

Solid Waste and Hazardous Materials Comment 3:

Commenters requested a clear statement of mitigation measures to be taken for minimization of water and industrial waste from the facility.

Response: Minimization and mitigation are not synonymous. Micron will implement avoidance and minimization measures to minimize water and industrial waste from the facility. As described in FEIS Appendix K-6, Micron would work closely with equipment and material suppliers to reduce its energy and water consumption and waste generation. Section 3.10.5 of the FEIS, Table 3.10-5 provides BMPs for the minimization of water use at the Proposed Project. The BMPs include: (1) achieve LEED Gold certification for all fabs and use commercially reasonable efforts to achieve LEED Platinum certification for all office buildings; and (2) increase and maximize water recycling, reuse, and restoration, where feasible.

FEIS Section 3.8 explains that non-hazardous sludge from on-site wastewater treatment would be sent to a beneficial use vendor or recycled. For any hazardous waste, permitted private hazardous waste haulers would collect hazardous waste and bring it to facilities authorized by NYSDEC or analogous out-of-state regulatory agencies for disposal in accordance with applicable RCRA regulations. Because transport of all hazardous waste would be performed by permitted hazardous waste haulers and disposal of all hazardous wastes would occur at a RCRA-permitted treatment, storage, or disposal facility, no adverse effects to the environment or surrounding communities is anticipated.

The waste minimization program effectiveness at the Proposed Project would be continuously evaluated and updated to meet requirements of Federal regulations and Micron's Global Sustainability Standards. See FEIS Appendix K-12 for an example Micron waste minimization procedure that would be adapted for the Proposed Project and for an example of Micron's Recycling and Solid Waste Program that would be adapted for the Proposed Project.

Solid Waste and Hazardous Materials Comment 4:

General concerns were raised that the Project will result in pollution from solid waste and hazardous materials to the local environment.

Response: Micron's implementation of the Proposed Project would be subject to multiple federal and state regulations (RCRA, HMTA, EPCRA, CAA, TSCA, NYCRR Part 360, etc.) and extensive plans and procedures (e.g., RMP, CWMP, Waste Management Plan, SMMP, SPCC Plan/SPR, SWPPP, etc.) developed pursuant to those programs to prevent environmental exposure to chemicals used for the Project. See FEIS Section 3.8, Table 3.8-1. Micron would also implement several best management practices, as shown in FEIS Table 3.8-13, to address solid and hazardous waste generation and the use of hazardous materials over time and minimize the amount of waste that is generated and requires disposal. All disposal facilities used by Micron will be licensed in accordance with all applicable laws and regulations.

Solid Waste and Hazardous Materials Comment 5:

General comments indicated that Micron must adopt detailed plans that include best management practices to ensure the proper treatment, handling and disposal of solid and hazardous wastes, implementing state-of-the-art protocols. These plans should be publicly available.

Response: See Response to Solid Waste and Hazardous Materials Comment 4. As discussed in FEIS Section 3.8, Micron would be required to maintain a robust framework for managing both hazardous and non-hazardous waste at the Micron Campus, which is governed by applicable federal, State, and local hazardous waste generation, storage, and handling/transportation requirements, e.g., federal RCRA requirements and NYSDEC's Part 360 regulations. No waste or hazardous waste would be disposed of at the Proposed Project site. As explained in FEIS Section 3.8, waste would be disposed of or recycled off-site in appropriately licensed waste disposal facilities. For reference, a draft construction phase SMMP and a draft CWMP are included as FEIS Appendices K-7 and K-8, respectively.

Solid Waste and Hazardous Materials Comment 6:

A commenter stated that annual training for the handling of hazardous materials should be required. Other commenters requested information on the training that will be provided to all emergency personnel, including hospitals, to respond to chemical hazards at the site.

Response: Per the requirements set forth in 29 CFR Part 1910.120, any workers that are involved with hazardous waste/materials operations or emergency response are required to take a 40-hour training course and an annual 8-hour refresher course. Micron would develop and implement a Hazardous Waste Training Procedure outlining the federal and state (NYSDEC and NYSDOT) training requirements for employees who handle hazardous waste. See FEIS Section 3.8.3.2, Hazardous Waste. As indicated in the Hazardous Waste Contingency Plan outline included in FEIS Appendix K-9, Micron would provide personnel with the following: (1) hazardous waste training;

(2) fire extinguisher training; (3) first aid/CPR/AED training; and (4) emergency operations training.

Micron would be required to implement its EMS and deploy its ERT beginning with construction. As part of construction planning, Micron would engage closely and collaboratively with local fire departments, including Clay Fire and Cicero Fire, to familiarize local fire service personnel with any potential Proposed Project construction hazards such as construction site fuel and chemical storage, jointly prepare to implement best management practices for construction fire safety, and ensure compliance with applicable fire protection code requirements. See FEIS Section 3.14.3.2. The ERMS and ERT also would be in place and govern emergency response throughout continuous Proposed Project operations. As part of the ERMS, Micron management and the ERT would conduct regular emergency drills and would implement site-specific emergency response protocols in coordination with local first responders, including specialized emergency response measures developed in collaboration with the Clay Fire Department, and would establish an emergency response support agreement with the Syracuse Fire Department.

Micron also would be responsible for implementing its RMP, Process Safety Plan, and other measures consistent with USEPA regulations. Micron would ensure its emergency response protocols align with facility hazard monitoring systems, including leak detection and automatic shutdown systems and emergency evacuation alarms.

Solid Waste and Hazardous Materials Comment 7:

With respect to hazardous waste management, the commenter would like to see more details regarding the design of chemical/waste loading/unloading facilities, storage facilities (e.g., tanks, drums, ISO tanks, gas canisters, etc.), and conveyance systems.

Response: The requested information will be included in the joint SPCC, SPR, and Process Safety Plan, as discussed in FEIS Section 3.8.3.2.

Solid Waste and Hazardous Materials Comment 8:

A commenter requested that Micron develop a plan for food waste donation and have an on-site anaerobic digestion or composting system.

Response: As discussed in FEIS Section 3.8.3.2, Operational Effects, Solid Waste, Micron “would ensure that Proposed Project facility kitchens and eating areas segregate food waste via composting to the greatest extent practicable for on-site reuse, or transport to the Jamesville or Amboy Compost Sites, private compost facilities, or, in coordination with Onondaga County, other potential sites that may be able to beneficially reuse composted material.”

Solid Waste and Hazardous Materials Comment 9:

General comments were made indicating that Micron is not being transparent about what chemicals will be transported, used on-site in manufacturing and stored and the amounts, as well as justification for the quantities used. Micron should provide the public with all of this information, including extremely hazardous substance quantities

regardless of threshold reporting requirements. Micron should be subject to third party review of its compliance with chemical storage and management requirements.

Response: FEIS Section 3.8.3.2 summarizes the types and estimated quantities of chemicals to be used at the Micron Campus sufficient to analyze potential significant adverse impacts. Additional information on PFAS substances used in semiconductor manufacturing is set forth in Appendix L-1 as well as on the Semiconductor PFAS Consortium website at www.semiconductors.org/pfas, including “Background on Semiconductor Manufacturing and PFAS” (May 17, 2023). See also NIST, “Final Programmatic Environmental Assessment for Modernization and Expansion of Existing Semiconductor Fabrication Facilities under the CHIPS Incentives Program” (2024) at Appendix C.

As discussed in FEIS Section 3.8.3.2, Micron would be required to store and handle all chemicals in compliance with applicable Federal and State laws and regulations, including the HMTA, EPCRA, USEPA RMP regulations, and the NYSDEC’s CBS, PBS, and MOSF Programs. The Micron Campus will be subject to third party review of its chemical storage and management by the PBS and CBS programs. Under EPCRA, Micron would be required to submit Tier II reports listing hazardous chemicals stored on-site above applicable threshold quantities to USEPA, the New York State Division of Homeland Security and Emergency Services, and local fire departments. Micron would also be required to submit TRI data using Form R reports to USEPA by July 1 of each year identifying the chemicals subject to the TRI used on-site and describing the toxic chemical management and release prevention activities that occurred on-site during the previous calendar year. The public would have access to the facility's Tier II reports and Form R reports as well as the Risk Management Plan (RMP) per Section 112(r) of the Clean Air Act and USEPA regulations, as described in Section 3.8.3.2. See FEIS Section 3.8.3.2 for a full discussion of the federal and state regulations related to storage of all chemicals and the handling requirements to which Micron must comply, as well as Micron's facility leak detection and monitoring methods, chemical storage practices, and plans for emergency spill response.

There are certain chemicals that are proprietary trade secrets and highly confidential business information. Micron does not share proprietary information with the public. Further, as discussed in FEIS Section 3.8.3.2, Micron will be required to have a policy requiring its chemical suppliers to provide full disclosure of chemical constituents to Micron, which often requires use of non-disclosure agreements. These disclosures are used to manage potential risks to human health and the environment while maintaining confidential business information. Regulatory agencies with permitting authority will have confidential access to specific compounds used at the Micron Campus and thus would have the ability to assess whether the use, delivery, storage, and disposal of these chemicals comply with applicable laws and regulations. Neither Micron nor the lead agencies can share proprietary information with the public. Notwithstanding, sufficient information has been provided to identify hazardous materials use and management, and to address the potential risks and procedural controls in place to manage the risk associated with using these materials.

Solid Waste and Hazardous Materials Comment 10:

While Micron’s 2024 Sustainability Report (Appendix K, Vol. 2, p. 395) mentions a “rigorous review and approval process” for hazardous and restricted substances, the DEIS does not disclose what this process entails.

Response: State and federal laws establish rigorous review and approval processes for the generation, treatment, storage, and disposal of hazardous waste at the facility, including the Resource Conservation and Recovery Act (RCRA) - a federal law for managing hazardous waste from “cradle-to-grave,” and which covers generation, storage, treatment, and disposal of such wastes. As discussed in FEIS Section 3.8.3.2 and Appendix L-1, in addition to these legal mandates, Micron will be required to have a policy to secure full chemical disclosure from all chemical suppliers, which often requires use of non-disclosure agreements. These disclosures are used to evaluate and manage potential risks to human health and the environment while maintaining confidential business information. The chemical constituents are reviewed against applicable legal requirements and internal policies to ensure that restricted chemicals are not used onsite or have appropriate constraints on use. Chemicals may not be brought onsite without completing this review. See also Response to Solid Waste and Hazardous Materials Comment 2.

Chemical selection also is built into the broader Micron business process which includes site and global tool and output planning teams. This global and local planning team develops equipment listing based on strategic process selection. From there, the team works through a multifunction review to ensure the appropriate tools, design, facilities, and internal laboratory needs are met. These teams typically develop the planning needs and requirements for key process chemicals. The key process chemicals undergo review by design, engineering, and process safety management teams to ensure appropriate quantity, storage and distribution system engineering and design, and safety procedures, training, and operational hazard review. Examples may include bulk nitrogen, nitrogen trifluoride, and ammonia. Once operational, additional chemical needs (e.g., process gases, chemicals) may be requested by facilities operations team members on an as-needed basis. Once chemicals are requested, they undergo an internal Micron review process. This internal process includes review for safety, environmental requirements, and a review of restricted chemicals. This process includes review of chemical identification, hazards, composition, first aid measures, firefighting measures, accidental release measures, handling and storage, exposure control and personal protection, physical and chemical properties, stability and reactivity, toxicological information, ecological information, disposal and transport considerations, and regulatory information, among others.

Solid Waste and Hazardous Materials Comment 11:

Micron must provide a full list of the hazardous substances to be used during construction and operation of the Proposed Project and Connected Actions. This list should include volumes and quantities and possible exposure pathways. Micron has not justified the quantities of chemicals used in manufacturing.

Response: See Response to Solid Waste and Hazardous Materials Comment 9. The types and quantities of chemicals to be used will be based on similar facilities, taking the proposed design and operations into account.

Construction of the Connected Actions would not be anticipated to involve the use of hazardous materials other than minimal amounts associated with typical construction materials, as described in FEIS Section 3.8.2.3, Construction Effects, Hazardous Waste. Operation of the National Grid improvements would not require chemical bulk storage or non-bulk containers of hazardous materials, or any increase in petroleum bulk storage capacity. OCWA anticipates operation of the off-site utility improvements would require increases in chemical bulk storage at the LOWTP Site and Terminal Campus Site and an increase in petroleum bulk storage at the LOWTP Site and Terminal Campus Site. The increases would be subject to NYSDEC CBS and PBS design requirements and updated registration requirements but do not represent an operational change to the existing facilities other than operating at an increased capacity. Chemicals required for operation of the IWWTP are listed in FEIS Table 3.8-11.

Solid Waste and Hazardous Materials Comment 12:

Micron must commit to the goal of reducing its use of hazardous substances over time. Micron should conduct a future review of its use of hazardous substances at the Proposed Project and provide it to the public for review.

Response: The lead agencies are satisfied with Micron's sustainability goals and internal chemical review process. Any additional requirements will be determined by the appropriate regulatory agencies.

Solid Waste and Hazardous Materials Comment 13:

Micron should disclose its internal chemical review process, including its criteria for eliminating substances of concern, and provide examples of chemicals that were phased out.

Response: See Response to Solid Waste and Hazardous Materials Comment 10.

Solid Waste and Hazardous Materials Comment 14:

Concerns were raised about the transparency of the volume and types of hazardous waste to be disposed of from the Proposed Project, as well as the percentage of hazardous waste to be recycled.

Response: The FEIS provides information regarding the volume and types of hazardous waste to be disposed of by the Proposed Project. FEIS Section 3.8.3.2 provides the volumes and types of hazardous waste associated with the Proposed Project as well as Micron's RRR program that deals with the handling of hazardous waste, among other types of waste. As shown in FEIS Table 3.8-6, beginning with the start of Fab 1 operations in 2029, the Micron Campus would generate an estimated 18,300 tpy of hazardous waste and 170 tpy of universal waste. By full build-out in 2041, these figures would increase to an estimated 50,300 tpy of hazardous waste and 470 tpy of universal waste. Table 3.8-7 shows the hazardous waste accumulation quantities by Fab, providing the waste type, quantity per day and year, storage type and disposal/management. Table 3.8-8 shows the various types of hazardous and universal waste or RRR material the Micron Campus would generate as well as anticipated management or disposal methods and locations. Micron

would manage hazardous and universal materials through its RRR Program to the greatest extent practicable to reduce the volume of material that would need to be managed as hazardous waste for disposal. For further details on the RRR Program, see FEIS Appendix K-6.

Solid Waste and Hazardous Materials Comment 15:

The DEIS references several key programs—such as hazardous waste reduction plans, contingency plans, and chemical approval protocols—but offers no documentation or evidence of implementation.

Response: The FEIS is a forward-looking document discussing activities that will occur if the Proposed Project is approved, constructed and implemented. Draft documentation of plans and procedures to be implemented, such as Micron’s SMMP (Appendix K-7), Construction Waste Management Plan (CWMP) (Appendix K-8), and Hazardous Waste Contingency Plan (HWCP) (outlined in Appendix K-9) are included in the FEIS and associated documentation.

Solid Waste and Hazardous Materials Comment 16:

While the DEIS announces a goal of “near-zero hazardous waste-to-landfill” by 2030, it includes no implementation plan, timeline, or metrics to track progress. There is no public explanation of how “near-zero” is defined, whether PFAS-containing waste is included, or what accountability mechanisms exist.

Response: FEIS Table 3.8-13 identifies the best practices for implementation of Micron’s hazardous waste goals. The term “near-zero” reflects Micron Technology’s goal of “zero (<1%) hazardous waste to landfill in CY30,” subject to vendor availability, as identified in Micron Technology’s 2025 annual sustainability report, which also discusses related metrics. PFAS-containing materials and wastes will be managed in accordance with legal requirements and the framework discussed in FEIS Appendix L-1. The best practices identified in the sustainability report exceed those required by applicable federal, state, and local law and analyzed in the FEIS.

Solid Waste and Hazardous Materials Comment 17:

Micron should fund daily or weekly testing of water, air and soil for levels of toxic chemicals.

Response: Regular testing of the Micron Campus’s air emissions and wastewater is required pursuant to applicable law, regulations, and permits that would govern its operations. Testing of soil would not be appropriate or required unless there is a material release.

Solid Waste and Hazardous Materials Comment 18:

The DEIS incorrectly assumed that the chemical usage during operation of the Connected Actions will be like that of the Proposed Project.

Response: See Response to Solid Waste and Hazardous Materials Comment 11.

Solid Waste and Hazardous Materials Comment 19:

Dispersion modeling is needed to assess risks to nearby childcare centers, homes, or schools, including risk from nearby chemical storage areas.

Response: Dispersion modeling has been conducted for the Micron Campus as part of the air permitting, to assess potential impact and risk to nearby receptors. See FEIS Section 3.6.3.2, Air Dispersion Modeling. See also Response to Air Quality Comment 2.

Solid Waste and Hazardous Materials Comment 20:

The Micron facility may be required to prepare and submit a Facility Response Plan for the handling of bulk petroleum storage. SPCC Plans are required to address petroleum bulk storage at the Proposed Project and wastewater treatment plants.

Response: See Responses to Solid Waste and Hazardous Materials Comments 4 and 5. A Facility Response Plan would be required if the total oil storage capacity at the site equals or exceeds 1 million gallons, in accordance with federal regulations under 40 CFR Part 112. For the wastewater treatment plant, a separate Spill Prevention, Control, and Countermeasure (SPCC) Plan would be required for the associated Connected Action if the combined petroleum storage capacity exceeds 1,320 gallons. Additionally, NYSDEC Petroleum Bulk Storage (PBS) registration would be required if the aggregate storage capacity exceeds 1,100 gallons, as specified under 6 NYCRR Parts 612–614.

Solid Waste and Hazardous Materials Comment 21:

Table 3.9-2: In the risk management measures for toxic and sensitizing hazards describe whether the exhaust from gas operations will be treated prior to discharge. The same comment applies to Table 3.9-3.

Response: Emissions associated with operations are discussed in FEIS Section 3.6, which includes a variety of air emissions control devices/technologies (e.g., thermal oxidation, acid scrubbers, etc.) that will be used. A comprehensive and detailed analysis was completed for applicable criteria pollutants (NAAQS), hazardous air pollutants (HAPs) and non-criteria pollutants from all project phases for stationary and mobile emissions sources, demonstrating compliance with all applicable regulatory thresholds and guidance concentrations (which are protective of human health), and therefore no significant adverse impacts to air quality are anticipated.

Solid Waste and Hazardous Materials Comment 22:

An inventory of chemicals used at the site should be provided to an oversight agency, along with projected annual use, formulations and treatability.

Response: See Response to Solid Waste and Hazardous Materials Comment 9. The Micron Campus will be subject to third party review of its chemical storage and management by the NYSDEC's Petroleum Bulk Storage (PBS) and Chemical Bulk Storage (CBS) programs. Under

the NYSDEC CBS Program, chemical storage tanks on the Micron Campus would be subject to registration and inspection. Under Federal law and the NYSDEC PBS and MOSF Programs, fuel storage tanks on the Micron Campus also would be subject to similar requirements.

Solid Waste and Hazardous Materials Comment 23:

It would help to note the available permitted capacity remaining at Seneca Meadows and High Acres landfills and any planned expansions that need to be permitted. (DEIS Page 3-224, Section 3.8.2.3)

Response: FEIS Appendix K-2 contains a thorough discussion of the remaining capacities of the various landfills in the area. As stated in Appendix K-2, although it is outside the study area, Onondaga County Resource Recovery Agency (OCRRA) has contracted with Seneca Meadows, Inc. through December 2025 for transfer of some MSW and CDD to Seneca Meadows Landfill in Waterloo, Seneca County, which accepts asbestos, industrial ash, CDD, contaminated soil, sludge, other industrial wastes, and MSW. However, the Seneca Meadows Landfill is expected to be at capacity in the near term, with no remaining permitted capacity to be constructed. A permit application has been submitted to expand the facility, but has not yet been approved (Seneca Meadows Inc., 2023).

Although it is outside the study area, High Acres Landfill & Recycling Center is a privately-owned landfill in Fairport that straddles the eastern edge of Monroe County and the western edge of Wayne County and receives waste from Onondaga County. The center receives asbestos waste, CDD, industrial waste, MSW, petroleum contaminated soil, and sewage treatment plant sludge. The center's 2022 annual report estimated its remaining life to be 3 years and 6 months based on constructed capacity and 31 years and 4 months based on permitted capacity still to be constructed.

Solid Waste and Hazardous Materials Comment 24:

The DEIS projects 50,300 tons of hazardous waste annually at full buildout. What chemical waste accounts for the missing 9,500 ton/year of hazardous wastes estimated for each fab? What are the solvents? What are the acids? What is the rest of the waste?

Response: Although the commenter's reference to "the missing 9,500 tons/year of hazardous waste estimated for each fab" is unclear, as the footnote to FEIS Table 3.8-6 indicates, the incremental increases in the estimated quantities of waste from the addition of each fab would be less than the estimated quantity of waste from the first fab due to economies of scale. See FEIS Section 3.8.3.2. Solvents likely to be used include isopropyl alcohol and propylene glycol monomethyl ether acetate. Acids likely to be used include hydrofluoric acid, sulfuric acid, copper sulfate, and nitric acid. See FEIS Table 3.8-8. See also Response to Solid Waste and Hazardous Materials Comment 2.

Solid Waste and Hazardous Materials Comment 25:

Table 3.8-8 lists categories such as “glues,” “lab waste,” and “resins,” but omits quantities and chemical identities. The lack of clarity makes it impossible to evaluate risk or ensure proper treatment.

Response: Table 3.8-8 shows the various types of hazardous and universal waste or RRR material the Micron Campus would generate and anticipated management or disposal methods and locations. More granular data is unnecessary.

As stated in the text following Table 3.8-8, collectively these chemicals will constitute over 25 tons/yr. Because the Micron Campus would generate 25 tpy or more of hazardous waste, under NYSDEC regulations, Micron would be required to, among other requirements, develop a Hazardous Waste Reduction Plan subject to NYSDEC review and approval. Micron would also manage hazardous and universal materials through its RRR Program to the greatest extent practicable to reduce the volume of material that would need to be managed as hazardous waste for disposal. See FEIS Appendix K-6. Permitted private hazardous waste haulers would collect hazardous waste generated by the Proposed Project and bring it to facilities authorized by NYSDEC or analogous out-of-state regulatory agencies for the disposal of hazardous waste in accordance with RCRA regulations.

Solid Waste and Hazardous Materials Comment 26:

DEIS Page 3-217, Section 3.8.1: The last paragraph indicates there are no local regulations or laws regarding hazardous waste or hazardous substances, which may be true but Table 3.8-1 does include local laws and regulations for solid waste. The text should be revised to note the local requirements listed in the table or delete the sentence regarding local regulations in the paragraph.

Response: The referenced text in the FEIS is correct. Hazardous waste, hazardous materials, and solid waste are different substances. The inclusion of the local solid waste regulations in the table does not contradict the statement prior to the table indicating that there are no local regulations that specifically regulate hazardous wastes/materials.

Solid Waste and Hazardous Materials Comment 27:

Page 2-18, Section 2.1.2.3: It would help to explain why the possibility of using the Rail Spur Site for transport of hazardous substances to be used at the facility is not being considered, as it is a safer transportation mode and likely preferable to the large number of tanker trucks running along our roadways which are susceptible to accidents and chemical spills.

Response: The Rail Spur Site is primarily intended and designed to facilitate materials movement for the construction of the Micron Campus and would be operated by a third party. The Rail Spur Site would not be used for hazardous materials/waste..

Solid Waste and Hazardous Materials Comment 28:

Page 3-89, Table 3.3-12: In the bullet list there is an auto shutoff valve mentioned, but this will require real-time monitoring, which is not possible for all discharge parameters, so the bullet should be qualified as such. The bullet list mentions an Accidental Spill Prevention Plan but it was not mentioned when spills were discussed previously, please describe this plan as it relates to the SPCC Plan. Spill response should also be included in the table.

Response: Table 3.3-12 has been revised in the FEIS to include the information requested in the comment.

Solid Waste and Hazardous Materials Comment 29:

Page 3-218, Table 3.8-1: The description for TRI under EPCRA should more clearly note the reporting requirements so the public understands that there will be periodic reporting about toxic releases that they will have access to. The latter part of the description implies the reporting but some additional clarity is warranted.

Response: TRI reporting requirements are further discussed in FEIS Section 3.8.3.2 which explains that Micron would be required to submit TRI data using Form R reports to USEPA by July 1 of each year identifying the chemicals subject to the TRI used on-site and describing the toxic chemical management and release prevention activities that occurred on-site during the previous calendar year (information which USEPA would make publicly available).

Solid Waste and Hazardous Materials Comment 30:

Page 3-220, Table 3.8-2: The table only references obtaining an ID number but there should be much more required for the facility under RCRA so please revise the table accordingly.

Response: The information requested is provided in FEIS Table 3.8-1, where references to obtaining an ID number, as well as additional information, are provided. The description for RCRA regulations in that table states that, "RCRA solid waste regulations establish general guidelines for the management of non-hazardous solid waste. The guidelines are generally implemented at the state level and are primarily focused on facilities that thermally process or dispose of municipal solid wastes, persons or facilities that generate or manage residential, commercial, or institutional wastes, and states developing solid waste management plans. RCRA regulations also define when non-hazardous secondary materials destined for use as fuels or ingredients in combustion units qualify as solid wastes regulated under the Clean Air Act, which are regulated in New York State by NYSDEC. RCRA regulations also establish standards for the characterization, transportation, storage, and disposal of hazardous waste, and prescribe requirements to obtain USEPA hazardous waste generator ID numbers, hazardous waste accumulation time and quantity limits, and recordkeeping and reporting requirements. NYSDEC is authorized to implement RCRA in lieu of USEPA in New York State."

Solid Waste and Hazardous Materials Comment 31:

Page 3-221, Section 3.8.2: It would help to list the 5 counties referenced in the first paragraph. In Section 3.8.2.1 regarding Phase 1 Assessments, it would help to indicate that the scope included a site walk of the properties examined. Also, it appears there were no Phase 2 activities completed on the properties but I would recommend Micron complete some baseline sampling of soils, groundwater, surface water, noise and air at the site (and surrounding areas for air and noise) so they know what conditions existed when taking ownership of the property. It could help in the future if extraordinary conditions arise, to establish whether conditions changed and to what extent.

Response: The five-county region is defined in an earlier section as Onondaga, Oswego, Madison, Cortland, and Cayuga Counties. See FEIS Section 3.1.3.2. Micron will address any necessary media sampling pertaining to Phase I ESA findings through the SMMP, as indicated in FEIS Section 3.8.2.1 and included as Appendix K-7. Phase I ESA methodology, including site inspection, is part of the ASTM standard practice, as described in Phase I ESAs provided in Appendix K. Noise and air resources are addressed separately in FEIS Sections 3.12 and 3.6, respectively.

Solid Waste and Hazardous Materials Comment 32:

Page 3-222, Section 3.8.2.2: Note if any hazardous substances (e.g., asbestos, lead paint, PCBs) were removed when homes were demolished. In the paragraph regarding National Grid's substation it should be noted whether any herbicides were used that could have contaminated groundwater (note arsenic based herbicides were commonly used at substations), are/were there any PCB containing transformers or capacitors, and whether an SPCC Plan exists to cover the bulk petroleum tank. The same comment applies relative to an SPCC Plan at the LOWTP and OOWWTP.

Response: Pursuant to 12 NYCRR Part 56, an asbestos survey must be completed by a licensed asbestos contractor prior to demolition. The referenced demolitions have already occurred, were done in accordance with all applicable federal, state and local requirements, and are outside the scope of the FEIS. Any required future demolitions will also be completed in accordance with all applicable federal, state and local requirements. Soil characterization will occur for all ground disturbing activities associated with Proposed Project construction, and any contaminated soil encountered will be dealt with in accordance with applicable local, state, and federal law.

With respect to the presence of PCB containing transformers or capacitors at National Grid's substation, dielectric oil in some substation equipment historically contained PCBs; however, none of the equipment currently in operation at Clay substation is known to contain PCBs, and no PCB-containing equipment will be installed at the station as part of this project. National Grid maintains and implements an SPCC Plan for Clay substation, which includes procedures to operate bulk petroleum tanks and measures for spill prevention and mitigation. None of the vegetation management products the Company currently uses or has records of using in the past are arsenic-based and National Grid is not aware of groundwater impacts resulting from application of the vegetation management products it uses.

See also Response to Solid Waste and Hazardous Materials Comment 20, for discussion of SPCC Plans (applicable to LOWTP and OOWWTP).

Solid Waste and Hazardous Materials Comment 33:

Page 3-226, Table 3.8-3: In the first entry, assess whether uncontaminated excavated soil ineligible for beneficial use could be used as landfill cover at solid waste facilities, as this would be another form of beneficial use. Relative to footnote 72, recommend the backup for the estimated quantities be provided in an appendix and referenced as such in the footnote.

Response: See Response to Geology/Soils Comment 10. ECL Article 27 and 6 NYCRR Part 360 govern the beneficial use of soil, fill, and other materials. Not all excavated soils will be suitable for reuse under the BUD program. Soils that are uncontaminated but ineligible for beneficial use may be directed to solid waste facilities for use as landfill cover, consistent with NYSDEC guidance and waste management protocols, as has been indicated in the revised table. To support this approach, Appendix E provides extensive geotechnical data characterizing the physical properties of native and excavated soils.

Solid Waste and Hazardous Materials Comment 34:

Page 3-228: In the final paragraph, provide a preliminary estimate of the amount of soil to be reused on-site. In addition, please assess whether some of the excavated wetland soils could be used in wetland restoration at the proposed mitigation sites. It may be optimistic to assume all remaining soils would be recyclable, which is inconsistent with Table 3.8-3 that indicates some soils may need to be disposed in commercial landfills.

Response: It is not possible to accurately quantify the volume of soil suitable for reuse on-site at this time. Notwithstanding, Micron will investigate the possible re-use of excavated wetland soils for re-use at the proposed mitigation sites. This would be based upon a number of factors, including soil condition and compatibility at the proposed wetland mitigation site, regulations regarding the re-use/transportation of soils, and feasibility of soil re-use, among other considerations.

Solid Waste and Hazardous Materials Comment 35:

Page 3-229: Please assess whether some of the soils described in the first paragraph could be used as daily cover at the landfills.

Response: See Response to Geology/Soils Comment 10.

Solid Waste and Hazardous Materials Comment 36:

Page 3-233: A Commenter recommended that the backup for all the estimates provided in this EIS be clearly documented in appendices. In the second to last paragraph describing industrial wastes, I would expect to see water and wastewater treatment sludges, spent filters, used PPE and other solid wastes, not just spent chemicals.

Response: Non-hazardous sludge from on-site wastewater treatment and non-hazardous contaminated debris, including wipes and filters, are categorized as an industrial material for the RRR program. See FEIS Table 3.8-5.

Solid Waste and Hazardous Materials Comment 37:

Page 3-235, Table 3.8-5: Describe the basis for determining that the non-hazardous sludge from wastewater treatment can be beneficially used. This could be accomplished using a footnote explaining the basis for concluding it can be beneficially used.

Response: Non-hazardous sludge, such as biosolids, can be reused in a number of ways, including as fertilizer, for biogas production, as a substitute for virgin materials in construction bricks, and many other uses. Materials would be tested for compliance with 6 NYCRR Part 360 Beneficial Reuse Determination (BUD) standards before off-site reuse.

Solid Waste and Hazardous Materials Comment 38:

Given the disclosed amount of hazardous liquids and gases stored per fabrication facility, Micron should consider on-site local monitoring, and continuous monitoring approaches that should be adopted in the environmental management plan.

Response: Storage systems for hazardous materials typically include continuous monitoring, as well as regular onsite inspections and best management practices. Those will be outlined in the Facility's Spill Prevention Report (SPR).

Solid Waste and Hazardous Materials Comment 39:

Page 3-241: Hazardous Materials subsection: In the list of example hazardous materials at the bottom of the page please add arsine if it will be used at the facility given its highly toxic characteristics.

Response: Micron utilizes a small volume of arsine in the n-type doping process of the silicon wafer to introduce arsenic into the semiconductor structure. The use of arsine is highly controlled due to its toxic nature and potential health risks. The FEIS has been revised where referenced to include arsine. See FEIS Section 3.8.3.2.

Solid Waste and Hazardous Materials Comment 40:

Page 3-242, Table 3.8-10: This table highlights the significant quantities of hazardous materials that will be stored on site, which includes a total of 55,780,000 gallons of bulk chemicals, and about 15,000 55-gallon drums. These quantities are broken down in general chemical types, but as noted in the general comments the DEIS, it does not list the specific chemicals delivered, stored and used at the facility. The Final EIS needs to include a complete list of chemicals used at the facility along with the quantities (by chemical) delivered, stored, used and disposed. The details can be provided in an appendix with Table 3.8-10 summarizing the total quantities by category. The Table should also clarify whether the quantities represent raw chemicals for use, or whether it

includes both raw chemicals as well as wastes. Finally, somewhere in this section the EIS needs to indicate which waste type PFAS compounds will fall under.

Response: See Response to Solid Waste and Hazardous Materials Comments 9, 22, and 29. There are certain chemicals that are proprietary trade secrets and highly confidential business information. Micron does not share proprietary information with the public. As discussed in FEIS Section 3.8.3.2, Micron will be required to have a policy that all of its chemical suppliers provide full disclosure of chemical constituents to Micron, which often requires use of non-disclosure agreements. These disclosures are used to manage potential risks to human health and the environment while maintaining confidential business information. Regulatory agencies with permitting authority will have confidential access to specific compounds used at the Micron Campus and thus would have the ability to assess whether the use, delivery, storage, and disposal of these chemicals comply with applicable laws and regulations.

Additionally, FEIS Appendix L-1 discusses the framework that Micron will use for management of PFAS-containing materials for RRR purposes and for treatment and disposal. Descriptions of the types of chemicals used onsite, including the types of PFAS used in semiconductor fabrication, have been provided. See FEIS Section 3.8.3.2; Appendix L-1. FEIS Appendix L-1 provides further detail on where PFAS are used in semiconductor fabrication, the types of PFAS used in such processes, the functionality of PFAS in these processes, the categories of PFAS that may be found in wastewater, the review of wastewater treatment technologies, and the management and disposal framework that will be applied at the Proposed Project.

Solid Waste and Hazardous Materials Comment 41:

The third bullet on DEIS page 3-297 should add increased risk of chemical spills from trucks delivering and transporting wastes, particularly during years when Fabs 1 and 2 are operational but Fabs 3 and 4 are under construction.

Response: The page referenced in this comment is in FEIS Section 3.11.2, with the referenced bullets summarizing 2018-2022 crash data. See Response to Transportation Comment 34. The analysis of potential environmental impacts in that section of the FEIS is exclusive to traffic and transportation, and not potential chemical spills. Instead, chemical spills are addressed in FEIS Section 3.8.

As discussed in FEIS Section 3.8, as a large quantity generator, Micron must comply with various regulations addressing transport and potential spills of hazardous waste, including USEPA and NYSDEC uniform hazardous waste manifest requirements (40 C.F.R. Pt. 262, Subpart B; 6 NYCRR Part 372), re-transport requirements (40 C.F.R. §§ 262.30 to 260.33; 6 NYCRR Part 372), and preparedness, prevention, and emergency procedure requirements (40 C.F.R. Pt. 262, Subpart M; 6 NYCRR §§ 373-3.3 to 373-3.4) (see page 3-236 of Section 3.8.3.2 of the FEIS).

As fabs become operational, the Micron Campus would require delivery of various hazardous materials by truck. See FEIS Section 3.8.3.2, All hazardous materials would be subject to applicable USDOT and NYSDEC permitting, registration, and reporting requirements. Micron would be required to manage the delivery of hazardous materials to the Micron Campus and their shipment for off-site disposal under the HMTA and USDOT and NYSDOT regulations. Micron

would apply for USDOT registration with the Pipeline and Hazardous Materials and Safety Administration and develop a Safety and Security Plan to adopt relevant personnel and facility security measures and provide USDOT training for relevant personnel (49 C.F.R. § 172.802).

Solid Waste and Hazardous Materials Comment 42:

Concerns were expressed regarding whether Micron will take responsibility for spills, and not the County. Costs of spill cleanup should not fall to the taxpayers. There is no plan for responsibility, and these types of plants are prone to accidents.

Response: See Response to Solid Waste and Hazardous Materials Comment 51. As part of its SPDES permit, Micron also would be required to implement SWPPP and SPCC/SPR Plan measures to reduce the risk of accidental releases, leaks, or spills during facility operations and provide for immediate containment and cleanup of any release. Typically, in such an instance, the Spill Response section of the NYSDEC would oversee remediation and monitoring of the spill, as per NYS laws and regulations. Liability for remediation due to potential future contamination is beyond the scope of the FEIS.

Solid Waste and Hazardous Materials Comment 43:

A commenter stated that the DEIS needs to assess the actual risks of spills and the method and timing for a spill response, especially given the fact that large quantities of chemicals are being transported to the facility, and large quantities of waste chemicals are being transported away from the facility. The risk analysis should include data on spills, violations, and exceedances within the domestic semiconductor industry or at other Micron facilities.

Response: See Response to Solid Waste and Hazardous Materials Comment 48, for discussion of the spill response plans and procedures for the Proposed Project. The Project would comply with all applicable state and federal laws and regulations with respect to hazardous material handling, use, disposal and prevention and remediation of spills. FEIS Table 3.8-13 provides a list of BMPs to be employed at the Proposed Project for construction and operation to prevent, contain and manage any potential spills at the site. Spill kits would be stationed throughout the site for quick response. Spill kits would be audited to make sure they are in good working order. Micron would also prepare a release response procedure and contingency plan to reflect hazardous material storage on the site. The Project's Spill Prevention Report would identify the measures being taken by the facility to prevent spills. Micron would maintain an on-site ERT for deployment, if necessary, to assess, manage, and respond to spills and emergency situations. Micron would contract with carriers and shippers of hazardous materials that maintain 24/7 emergency response support in the event of hazardous materials spills prior to and during transit, and appropriate incident reporting protocols. See FEIS Section 3.8.3.2. There have been no reportable spills or related violations at Micron Technology's domestic manufacturing operations within the last five years. Micron does not have access to records held by other domestic semiconductor manufacturers regarding related incidents or compliance metrics.

Solid Waste and Hazardous Materials Comment 44:

The DEIS does not consider the use of rail as a method of mitigating spill risk. It would help to explain why the possibility of using the Rail Spur Site for transport of hazardous substances to be used at the facility is not being considered. Rail would be a safer mode and likely preferable to the large number of tanker trucks on roadways which are susceptible to accidents and chemical spills.

Response: See Response to Solid Waste and Hazardous Substances Comment 27.

Solid Waste and Hazardous Materials Comment 45:

Describe in more detail the spill protection (e.g., secondary containment) that will be provided for the locomotive shed sump that is intended to collect waste fluids. (DEIS Page 2-20, Table 2.1-4)

Response: All design plans will be required to comply with applicable local, state and federal laws and regulations. The design for an engine sump is as follows: maintenance buildings for locomotive engines include several parallel tracks that run straight through the building with corresponding doors on either end. Under the building's canopy, one or more sumps cross under the tracks, running perpendicular to them. The sumps are made of cast iron and are deep enough for maintenance personnel to walk through under the tracks for access to the bottoms of the locomotive engines. Fuel and lubricants can be drained into containers located within the sumps during maintenance work to prevent spills.

Solid Waste and Hazardous Materials Comment 46:

The DEIS does not adequately address potential spills of hazardous chemicals, including during loading and unloading.

Response: See Response to Solid Waste and Hazardous Materials Comment 48.

Solid Waste and Hazardous Materials Comment 47:

Page 3-243: In the third paragraph, there is mention about shippers having spill procedures in place but protocols for spills at the Micron facility during chemical delivery unloading and loading for disposal or recycling needs to be described. The DEIS should add increased risk of chemical spills from trucks delivering and transporting wastes, particularly during the years when Fabs 1 and 2 are operating but Fabs 3 and 4 are under construction to transportation environmental impact analysis.

Response: See Response to Solid Waste and Hazardous Materials Comment 46. Hazardous chemical transfer procedures and spill response will be described specifically in the site SPR. Before the SPR can be drafted, the design of the hazardous chemical transfer and storage facilities must be finalized. Further, the specific chemical compounds and volumes must be finalized. Notwithstanding, the site SPR would include, reporting/notification requirements, spill assessment/response set up (e.g., isolating release, preventing spill from entering inappropriate or incompatible drains), cleaning up the material, decontamination of personnel and equipment,

verification of successful clean, determination of PPE), spill clean up methods, decontamination. Micron internal procedures would also indicate additional training, scenarios review.

Solid Waste and Hazardous Materials Comment 48:

Page 3-250, Table 3.8-13: The entries describing spills are very superficial and require further explanation. Spills and other inadvertent releases deserve much more discussion in the EIS, as they have the potential to contaminate building materials, soil, groundwater and surface water as well as potentially result in unacceptable employee exposure.

Response: The FEIS provides an extensive discussion of applicable federal and state-required plans and regulations required to prevent human and environmental exposure to chemicals associated with the Project in Section 3.9. See FEIS Sections 3.8.3.2 and 3.9.3.2; see also Response to Air Quality Comment 22.

Micron would be required to manage the delivery of hazardous materials to the Micron Campus and their shipment for off-site disposal under the HMTA and USDOT and NYSDOT regulations. See FEIS Section 3.8.3.2. Micron would apply for USDOT registration with the Pipeline and Hazardous Materials and Safety Administration and develop a Safety and Security Plan to adopt relevant personnel and facility security measures and provide USDOT training for relevant personnel (49 C.F.R. § 172.802). See FEIS Section 3.8.3.2, Operational Effects, Hazardous Materials. Micron would contract with carriers and shippers of hazardous materials that maintain 24/7 emergency response support in the event of hazardous materials spills prior to and during transit, and appropriate incident reporting protocols.

See also Response to Community Facilities Comment 1; Response to Solid Waste and Hazardous Materials Comment 57.

Solid Waste and Hazardous Materials Comment 49:

Page 3-254, Footnote 88: Commenter is concerned that health and safety protocols for operation of the Connected Actions will not be similar to those for construction and should be addressed separately.

Response: FEIS Section 3.9.3.2 (footnote) states that the human health and safety effects of the Connected Actions are assumed to be similar to those of the Proposed Project and are likely to pose a lesser degree of risk, not that the safety protocols for operations are similar to those for construction.

Solid Waste and Hazardous Materials Comment 50:

General concern was raised regarding the transportation of hazardous chemicals over local roadways to the site, as there is a high likelihood for spills on roadways escaping into the local environment, especially given the increase in traffic from the Project.

Response: Spills that occur during transportation are the responsibility of the transporter, as per USDOT regulations. See FEIS Section 3.8.3.2, Operational Effects, Hazardous Materials.

Typically, both the NYSDOT and the carrier retain on-call emergency response professionals that are immediately called when a chemical spill occurs during transportation. Initial response times vary based on the contract and the location of the spill. See also Response to Solid Waste and Hazardous Materials Comment 57.

Solid Waste and Hazardous Materials Comment 51:

Concerns were raised about who bears responsibility for future site remediation if contamination occurs? General statements were made concerning if Micron will be liable for future remediation.

Response: The FEIS evaluates the potential for adverse environmental impacts. Liability for speculative contamination is beyond the scope of the FEIS.

Solid Waste and Hazardous Materials Comment 52:

Concerns were raised about whether hazardous materials would be shipped via rail, and the impacts in the event of a derailment upon the community.

Response: The Rail Spur Site is not being considered for transport of hazardous materials. See FEIS Section 2.1.2.3; Responses to Solid Waste and Hazardous Substances Comments 27 and 44.

Solid Waste and Hazardous Materials Comment 53:

How long would it take for a national chemical carrier to respond to an accident involving a spill? What kinds of spills are they equipped to handle?

Response: See Response to Solid Waste and Hazardous Materials Comment 50. Hazardous waste would be handled in accordance with applicable federal, State, and local hazardous waste requirements, and disposed of in RCRA permitted hazardous waste facilities as appropriate. No significant impact to any community is anticipated from these activities.

Solid Waste and Hazardous Materials Comment 54:

Page 3-238: In the second paragraph where emergency response is discussed with notifications to first responders, there should be some discussion (or reference to another section where it's discussed) about training that will be provided to all first responders as well as hospital/urgent care facilities regarding the unique hazards, risks, and appropriate medical response to the myriad of chemicals that will be used at the facility. With respect to hazardous waste management, more detail is needed regarding the design of chemical/waste loading/unloading facilities, storage facilities (tanks, drums, ISO tanks, gas canisters, etc.), and conveyance systems. Somewhere secondary containment is mentioned and details on what that consists of would also be helpful to understand. This comment also applies to page 3-244.

Response: See Responses to Community Facilities Comments 1 and 2; Responses to Solid Waste and Hazardous Materials Comments 6, 7, and 46.

Solid Waste and Hazardous Materials Comment 55:

Page 3-241: Hazardous Materials subsection: In the list of example hazardous materials at the bottom of the page please add arsine if it will be used at the facility given its highly toxic characteristics.

Response: Micron utilizes a small volume of arsine in the n-type doping process of the silicon wafer to introduce arsenic into the semiconductor structure. The use of arsine is highly controlled due to its toxic nature and potential health risks. As such, this information has been revised in FEIS Section 3.8.3.2. See also Response to Solid Waste and Hazardous Materials Comment 39.

Solid Waste and Hazardous Materials Comment 56:

Page 3-242, Table 3.8-10: This table highlights the significant quantities of hazardous materials that will be stored on site, which includes a total of 55,780,000 gallons of bulk chemicals, and about 15,000 55-gallon drums. These quantities are broken down in general chemical types, but as noted in the general comments the DEIS, it does not list the specific chemicals delivered, stored and used at the facility. The Final EIS needs to include a complete list of chemicals used at the facility along with the quantities (by chemical) delivered, stored, used and disposed. The details can be provided in an appendix with Table 3.8-10 summarizing the total quantities by category. The Table should also clarify whether the quantities represent raw chemicals for use, or whether it includes both raw chemicals as well as wastes. Finally, somewhere in this section the EIS needs to indicate which waste type PFAS compounds will fall under.

Response: See Responses to Solid Waste and Hazardous Materials Comments 9 and 40. FEIS Table 3.8-10 represents hazardous materials to be used on-site and does not include hazardous wastes, which are discussed in FEIS Section 3.8.3.2, Hazardous Waste. FEIS Appendix L-1 provides additional information regarding PFAS solid waste treatment and disposal.

Solid Waste and Hazardous Materials Comment 57:

A commenter requested confirmation that Micron will maintain on-call contracts with trained private spill-response contractors capable of mobilizing quickly for on-site or off-site incidents.

Response: See Response to Solid Waste and Hazardous Materials Comment 48 and 50. Micron would maintain an on-site Emergency Response Team (ERT) for deployment, when needed, to assess, manage, and respond to spills and emergency situations. Further, Micron maintains on-call contracts with trained professionals to support Micron ERT, as needed or requested. See FEIS Section 3.8.4. Further as detailed in FEIS Section 3.8.3.2 “Micron would contract with carriers and shippers of hazardous materials that maintain 24/7 emergency response support in the event of hazardous materials spills prior to and during transit, and appropriate incident reporting protocols.” See also Responses to Community Facilities Comments 12 and 24.

Solid Waste and Hazardous Materials Comment 58:

Concerns were raised regarding plans for robust, independent oversight and enforcement of environmental regulations to prevent accidents, leaks, or spills during chemical transport, storage, or usage.

Response: See Response to Solid Waste and Hazardous Materials Comment 48.

Solid Waste and Hazardous Materials Comment 59:

Commenter requested further details on the training, expertise and ability, including equipment, of local and regional (City of Syracuse) fire and spill professionals to address a spill at the Micron site and the timeliness of the response. Commenter requested that all residents, including public schools, and plant workers be taught how to survive any potential future chemical spills and environmental accidents.

Response: See Responses to Community Facilities Comments 1 and 2. Micron's EHS team would be responsible for reviewing the facility's engineering design and developing occupational safety and health procedures, protocols, and training in accordance with OSHA, USEPA, and NYS Labor Law Article 27 requirements. Micron would establish Workplace Safety Committees (WSCs) to foster collaboration among management and employees and a structured process to proactively identify and address potential hazards and raise any safety concerns. FEIS Section 3.9.3.2, Operational Effects.

Micron would implement its ERMS and deploy its ERT beginning with construction. The ERMS and ERT also would be in place and govern emergency response throughout continuous Proposed Project operations. See FEIS Section 3.9.3.2, Operational Effects. As part of the ERMS, Micron management and the ERT would conduct regular emergency drills and would implement site-specific emergency response protocols in coordination with local first responders, including specialized emergency response measures developed in collaboration with the Clay Fire Department, and would establish an emergency response support agreement with the Syracuse Fire Department. Additionally, Micron would collaborate with the Local Emergency Planning Commission (LEPC), the Onondaga County Department of Emergency Management, in accordance with EPCRA requirements to develop comprehensive community emergency response plans and share chemical information with the local citizens.

Micron also would be responsible for implementing its RMP, Process Safety Plan, and other measures consistent with USEPA regulations. Micron would ensure its emergency response protocols align with facility hazard monitoring systems, including leak detection and automatic shutdown systems and emergency evacuation alarms.

Solid Waste and Hazardous Materials Comment 60:

A commenter requests that Micron create an independent citizen review board to monitor all chemical spills and water pollution.

Response: See Response to Solid Waste and Hazardous Materials Comment 48. Oversight of chemical spills and water pollution already exists through applicable state and federal programs.

Solid Waste and Hazardous Materials Comment 61:

The DEIS indicates that Micron intends to develop a Risk Management Plan (RMP), however, additional detail on how the public will access the RMP information is missing. The commenter asks if the RMP be published online or if hard copies will be available through local agencies and if updates will be automatically shared or only available by request?

Response: See Response to Solid Waste and Hazardous Materials Comment 9. RMP information may be accessed by the public via the EPA's Federal Reading Rooms, which information may include Off-Site Consequence Analysis (scenarios) portions of RMPs. RMP information without Off-Site Consequence Analysis is available upon request to EPA. Copies of the RMP would be provided to local police, fire, and emergency medical response personnel, and the public to foster local community emergency response planning and public awareness. Micron would be required to update and resubmit the RMP to EPA every 5 years with a history of any accidents that occurred in the 5 years prior. The updates would be automatically shared with local emergency responders.

Solid Waste and Hazardous Materials Comment 62:

Concerns were raised about whether the Project will be able to discharge hazardous waste chemicals into the wastewater above respective New York State Environmental Conservation Law standards.

Response: The Project's wastewater discharges will be required to adhere to all applicable federal and state standards for discharges as well as its IWDP to be issued by OCDWEP.

Solid Waste and Hazardous Materials Comment 63:

What analyses does the DEIS make regarding the availability of adequate volumes of permitted landfill capacity, and/or alternatives for waste reduction and reuse?

Response: FEIS Section 3.8 details conservative projections of how much additional solid waste would be generated associated with construction and operation of the Micron Campus. As stated in FEIS Appendix K-2, the OCRRA Solid Waste Management Plan, which is updated every two years, provides projections for waste and recyclables and outlines the facilities that OCRRA will use for recyclables and non-hazardous, commercial, and residential waste. OCRRA's Comprehensive Solid Waste Management Plan Update for 2023-2024 outlines steps OCRRA will take to achieve plan goals, including the education of waste generators on how to reduce waste streams and set up recycling programs. Based on the most recent Onondaga County LSWMP, the

MSW collected in 2021 was within OCRRA's projections, while the MSW collected in 2022 was below the projections (OCRRA, 2023).

To develop conservative projections of how much additional solid waste would be generated, Micron's analysis multiplied the higher induced household growth estimates included in FEIS Section 3.15 (Socioeconomic Conditions) by average county household size to derive estimated induced population growth and multiplied those population figures by the average daily MSW produced per person, based on available county-specific MSW data. The per capita MSW figures represent the total MSW collected within each county's solid waste management system, including residential, commercial, and institutional MSW.

FEIS Table 3.8-12 shows the resulting incremental MSW projections from induced growth. With certain permit modifications and expansions, solid waste disposal facilities in the five-county region are anticipated to be able to accommodate the solid waste flows from the proposed project. Additionally, Micron's RRR Program and other waste minimizations procedures would help reduce waste-to-landfill volumes. FEIS Tables 3.8-3 and 3.8-4 detail proposed project construction and operation-related solid waste vs. reusable or recyclable material. OCIDA has also coordinated with OCRRA regarding waste capacity availability for the project. See FEIS Appendix K-10.

Solid Waste and Hazardous Materials Comment 64:

General concerns were raised regarding hazardous waste materials being disposed of in local landfills.

Response: It is anticipated that hazardous waste would be sent out of-state for disposal, as Micron will only be able to dispose of hazardous waste at facilities permitted to accept such waste.

Solid Waste and Hazardous Materials Comment 65:

Commenter has concerns about the use of waste-to-energy facilities to incinerate waste from the Proposed Project. General concerns about the incineration of "non-recyclable" wastes with no accountability for hazardous emissions or ash disposal. Fluorinated and PFAS compounds should never be incinerated due to risk of toxic byproducts.

Response: FEIS Table 3.8-8 provides the disposal methods for various waste to be generated at the Micron facility, including incineration for designated types of waste. The only wastes currently intended for incineration are non-hazardous drummed used solvents, hazardous acidic waste, and miscellaneous maintenance waste (labpacks, cylinders, expired materials, glues, resins, etc.), as stated in FEIS Section 3.8.3.2. See also FEIS Table 3.8-8. NYSDEC is responsible for oversight of compliance with RCRA regulations, which includes waste incineration and associated permitting, performance standards, and operating requirements. Micron's use of incineration for waste generated at the site, including PFAS containing waste, will be in accordance with all applicable state and federal laws and will occur at USEPA licensed disposal facilities.

With respect to incineration of waste containing PFAS, U.S. EPA has identified incineration of PFAS-containing material as "a viable PFAS destruction technology if done under certain conditions," and further describes that use of "temperatures above approximately 1,100°C/2,012°F

may result in high destruction efficiencies and few detectable fluorinated products of incomplete combustion.” See USEPA “Interim Guidance on the Destruction and Disposal of Perfluoroalkyl and Polyfluoroalkyl Substances and Materials Containing Perfluoroalkyl and Polyfluoroalkyl Substances,” V.2., available at <https://www.epa.gov/system/files/documents/2024-04/2024-interim-guidance-on-pfas-destruction-and-disposal.pdf>.

Based on these and other considerations discussed in FEIS Appendix L-1, use of waste-to-energy facilities and incineration of fluorinated and PFAS-containing materials may be appropriate. In any case, Micron will comply with applicable laws, regulations, and permits in its management and disposal of PFAS-containing materials.

Solid Waste and Hazardous Materials Comment 66:

Comments were raised regarding the need for incineration of hazardous waste, including lab waste. Incineration of hazardous materials should include oversight by the appropriate agency. Reports should be made to the public about treatment of wastes and releases to the environment.

Response: See Response to Solid Waste and Hazardous Materials Comment 65. NYSDEC has oversight responsibility for compliance with RCRA regulations, which includes waste incineration and associated permitting, performance standards, and operating requirements. Per RCRA regulations, Micron is responsible for “cradle to grave” tracking of its onsite generated hazardous waste. This information is reported to NYSDEC annually on March 1st for the previous reporting year in the Hazardous Waste generator’s report, which includes volumes of hazardous waste generated, the disposal facilities where the hazardous waste is sent, and the disposal method (incineration, landfill, etc.).

Solid Waste and Hazardous Materials Comment 67:

Micron should commit to the complete destruction of chemicals before they enter the waste stream.

Response: See Response to Solid Waste and Hazardous Materials Comment 68.

Solid Waste and Hazardous Materials Comment 68:

Commenter stated that the EIS needs to define more fully the composition of the non-recyclable commercial waste. Waste containing fluoropolymers and PFAS should be segregated out before incineration.

Response: FEIS Section 3.8.3.2 states that, “[t]he commercial MSW from Proposed Project operations would consist primarily of various types of materials (e.g., metals, drums and cylinders, E-waste, batteries, plastic, foam, cardboard, scrap wood, office supplies, etc.). The non-RRR portions of this commercial MSW would be collected via licensed commercial haulers for transport to municipally owned waste disposal facilities within the OCRRA service area in accordance with the Onondaga County Flow Control Law, OCRRA’s Comprehensive and Local Solid Waste Management Plans (LSWMPs) (OCRRA, 2023), and OCRRA policies.”

The only wastes currently intended for incineration are non-hazardous drummed used solvents, hazardous acidic waste and miscellaneous maintenance waste (labpacks, cylinders, expired materials, glues, resins, etc.). See FEIS Section 3.8.3.2; Table 3.8-8; Appendix L-1. See also Response to Solid Waste and Hazardous Materials Comment 65.

As discussed in Appendix L-1, there is no one-size-fits-all technology or treatment program for PFAS-containing waste material. Micron's RRR Program will implement feasible, practicable, and necessary measures to reuse, recycle, and recover materials or waste generated at the facility that are consistent with USEPA's guidance on disposal and treatment of PFAS-containing wastes and New York State's beneficial use determination program. This may include incineration of PFAS-containing wastes, consistent with EPA guidance. .

Solid Waste and Hazardous Materials Comment 69:

The chemicals leaving the site as sludge, water discharge, and air releases should be monitored regularly, daily or weekly.

Response: Any required monitoring or testing will be done in accordance with all permits and applicable regulatory requirements.

Solid Waste and Hazardous Materials Comment 70:

Commenter requested that Micron be required to report on the location of solid waste and hazardous materials disposal, as well as the routes of the disposal trucks.

Response: See Response to Solid Waste and Hazardous Materials Comment 66. The FEIS provides an extensive discussion of the potential future disposal locations of solid waste and hazardous materials from the Proposed Project. See, e.g., FEIS Sections 3.8.2.3 and 3.8.3.2; Appendix K-6; Appendix K-8. Tracking and reporting of the disposal of solid waste and hazardous materials would be done in accordance with applicable permits and regulations.

FEIS Table 3.8-8 shows the various types of hazardous and universal waste or RRR material the Micron Campus would generate and anticipated management or disposal methods and locations. Micron would manage hazardous and universal materials through its RRR Program to the greatest extent practicable to reduce the volume of material that would need to be managed as hazardous waste for disposal. Permitted private hazardous waste haulers would collect hazardous waste generated by the Proposed Project and bring it to facilities authorized by NYSDEC or analogous out-of-state regulatory agencies for the disposal of hazardous waste in accordance with RCRA regulations. Micron would use a variety of local, regional, and national waste disposal and materials reuse vendors to appropriately manage hazardous waste and other materials. Micron anticipates that hazardous waste would be sent out of-state for disposal. Micron would be responsible for selecting specific vendors and disposal facilities as the Proposed Project progresses.

Per RCRA regulations, Micron is responsible for “cradle to grave” tracking of its onsite generated hazardous waste. This information is reported to NYSDEC annually on March 1st for the previous

reporting year in the Hazardous Waste generator's report, which includes volumes of hazardous waste generated, the disposal facilities where the hazardous waste is sent, and the disposal method (incineration, landfill, etc.).

Solid Waste and Hazardous Materials Comment 71:

Micron must disclose the expected quantity and composition of all sludge, require routine testing, and prohibit any reuse or land application without demonstrating it is safe. No beneficial use should proceed without prior contaminant screening.

Response: See Responses to Solid Waste and Hazardous Materials Comments 37 and 74.

Solid Waste and Hazardous Materials Comment 72:

A commenter states that grandfathering the treatment and remediation standards for the Project that isn't expected to be operating at its planned capacity for nearly 50 years is unacceptable given the certainty of changes in every aspect of plant operations.

Response: The lead agencies have not proposed any grandfathering. Micron and the entities implementing the Connected Actions and proposed environmental mitigation measures would be subject to ongoing federal, state, and local regulatory oversight, including permit conditions that require compliance with current and future environmental standards. These regulatory frameworks incorporate mechanisms such as permit renewals, inspections, and reporting, enabling agencies to address changing environmental conditions and operational practices. Any changes in operations or environmental conditions would be addressed through applicable permitting processes, which will apply current law and regulations and are designed to reflect current science and best practices.

Solid Waste and Hazardous Materials Comment 73:

Commenter requests a detailed list of the industrial wastes that will be disposed of in local landfills.

Response: See Responses to Solid Waste and Hazardous Materials Comments 23 and 70.

Solid Waste and Hazardous Materials Comment 74:

The DEIS fails to address the management of wastewater treatment solid by-products from the pretreatment process at the Micron Campus and the Oak Orchard Plant. The FEIS should estimate the quantity of sludge that will be generated on-site, describe its characteristics, including water content, and identify how it will be disposed of or options for disposal.

Response: See Response to Solid Waste and Hazardous Materials Comments 37 and 80. As discussed in FEIS Section 3.10.3.2, Water Treatment and Discharge Capacity, Micron is designing the Proposed Project to reclaim as much industrial wastewater from the manufacturing process as possible for reuse within the manufacturing facility before it would need to be directed to OCDWEP's systems. At this stage of the Proposed Project and IWWTP planning processes,

reclamation and remaining wastewater flow rate estimates are not yet available. Figure 3.10-4 in Section 3.10 of the FEIS illustrates the on-site water reclamation and reuse process. Micron would operate its wastewater pretreatment system in accordance with the limits set forth in its OCDWEP-issued IWDP. See FEIS Section 3.8.3.2, Operational Effects, Hazardous Waste.

Upon full buildout of all four fabs, Micron's onsite wastewater pretreatment facility will generate approximately 23,000 tons of by-product sludge per year (or approximately 5,750 tons/yr per fab). Micron's onsite wastewater pre-treatment sludge will be characterized/profiled to determine waste composition and proper disposal options per any applicable waste disposal and Beneficial Reuse Determination (BUD) regulatory requirements. As part of Micron's RRR sustainability goals, Micron is continuously evaluating beneficial reuse options for its sludge, such as reclamation in cement kilns. This information has been included in FEIS Section 3.8.

OCDWEP is similarly regulated by applicable waste regulations. OCDWEP would be responsible for ensuring that operation of the IWWTP complies with NYSDEC solids waste disposal regulations.

The Oak Orchard IWWTP is estimated to produce an annual average of biosolids of 8 tons./d during Fab 1 operations. An annual average of biosolids is estimated at 15 tons/d and an annual average of crystallized salt solids of 57 tons/d will be generated by Fab 1 and Fab 2 combined, with this quantity potential doubling during Fab 4 operations. Biosolids are produced from biological treatment, a wastewater treatment process that uses microbial communities present in nature harnessed in optimum conditions to break down organic material in the wastewater.

As a result of this process, wasted microbial solids are sent to solids handling which is comprised of gravity thickening followed by centrifugation for dewatering. Brine or TDS (salts) concentrate from the RO reject (to produce reclaim water) is concentrated by membranes treated using an evaporator followed by a crystallizer to further concentrate the TDS and generate brine solid slurry. The salt slurry is then further dewatered using centrifuges. The centrifuged solids are then disposed of off-site. Condensate water from the evaporation and crystallization processes are collected and will be reclaimed and/or discharged.

Disposal of sludge and brine from the IWWTP will be managed and disposed of in accordance with all applicable laws and regulations.

See also Responses to Solid Waste and Hazardous Materials Comments 71 and 80.

Solid Waste and Hazardous Materials Comment 75:

A previous draft of the DEIS (from March 2025) stated that, upon full buildout, the facility would generate "88,800 tons of RRR materials annually. Approximately 24 percent of this RRR volume would consist of recyclables (21,100 tons per year). The majority of the remaining RRR volume is anticipated to consist of [wastewater pre-treatment] sludge and metals." Based on that, over 67,000 tons of sludge and metals would be generated per year. These important details were removed from the draft released for public comment. They should be re-inserted.

Response: Upon full buildout of all four Fabs, Micron’s onsite wastewater pretreatment facility will generate a conservative estimate of 23,000 tons of by-product sludge per year (or approximately 5,750 tons/yr per fab). Micron’s onsite wastewater pre-treatment sludge will be characterized/profiled to determine waste composition and proper disposal options per any applicable waste disposal and Beneficial Reuse Determination (BUD) regulatory requirements. As part of Micron’s RRR sustainability goals, Micron is continuously evaluating beneficial reuse options for its sludge, such as reclamation in cement kilns.

Solid Waste and Hazardous Materials Comment 76:

“Non-hazardous sludge from on-site wastewater treatment” will be disposed of by “Send[ing] to [a] beneficial use vendor or recycle.” Is this sludge being generated from the four Biological Wastewater Treatment Facility described in DEIS Table 2.1-3 (DEIS, p. 2-13)? What substances are anticipated to be in this sludge and how will it be beneficially reused?

Response: See Responses to Solid Waste and Hazardous Materials Comments 37 and 71. The Hydrofluoride Wastewater sludge generated from onsite wastewater treatment operations would be handled through the RRR program. Reuse options being explored include reuse by cement kilns.

Solid Waste and Hazardous Materials Comment 77:

No explanation given in the DEIS as to how the sludge can beneficially reused or recycled. Appendix K-12 fails to provide or describe the beneficial reuse program used at other facilities.

Response: See Responses to Solid Waste and Hazardous Materials Comments 37, 71 and 76. Description of beneficial reuse programs at other facilities is outside the scope of the FEIS.

Solid Waste and Hazardous Materials Comment 78:

Page 3-257, Table 3.9-2: In the risk management measures for toxic and sensitizing hazards, describe whether the exhaust from gas operations will be treated prior to discharge. The same comment applies to Table 3.9-3.

Response: See Response to Solid Waste and Hazardous Materials Comment 21; Response to Air Quality Comment 15.

Solid Waste and Hazardous Materials Comment 79:

Page 3-274, Figure 3.10-4: Clarify the pretreatment that will occur at the Micron facility compared to the treatment by Onondaga County at Oak Orchard. Some clarification in the text and on Figure 3.10-4 would be helpful.

Response: Onondaga County (specifically OCDWEP) will be utilizing its Industrial Pretreatment Program, balancing USEPA categorical standards with NYSDEC SPDES permit limits to establish pretreatment/local limits that Micron must achieve for the wastewater discharge prior to

conveyance for further treatment at the IWWTP. Micron will need to comply with the pretreatment limits set forth by OCDWEP to discharge to the IWWTP. The IWWTP facility is designed to treat incoming pretreated Micron wastewater, and discharges will comply with all NYSDEC permit requirements. The outfall effluent will be closely monitored to ensure compliance. See also Response to Solid Waste and Hazardous Materials Comment 86.

In order to meet the effluent limitations in its IWDP, the Proposed Project will include wastewater treatment at the Micron Campus. As discussed in FEIS Section 3.8.3.2, Micron is evaluating various wastewater treatment technologies and their effectiveness to address the wastewater matrix anticipated for a high-volume semiconductor fabrication facility. See also FEIS Appendix L-1.

Solid Waste and Hazardous Materials Comment 80:

An estimate of the quantity of sludge that will be generated from the IWWTP should be provided in the Final EIS along with disposal options. A previous version of the DEIS provided an estimate of the industrial waste stream.

Response: See Response to Solid Waste and Hazardous Materials Comment 74; see generally FEIS Table 3.8-8. There is no prior version of the DEIS.

Solid Waste and Hazardous Materials Comment 81:

Transparency was requested regarding destination facilities and vendors, including Veolia, for disposal of hazardous waste.

Response: See Response to Solid Waste and Hazardous Materials Comment 70. FEIS Table 3.8-8 shows the various types of hazardous and universal waste or RRR material the Micron Campus would generate and anticipated management or disposal methods and locations.

As explained in FEIS Section 3.8, for any hazardous waste, permitted private hazardous waste haulers would collect hazardous waste and bring it to facilities authorized by NYSDEC or analogous out-of-state regulatory agencies for disposal in accordance with RCRA regulations. See FEIS Section 3.8.3.2, Hazardous Waste. Because transport of all hazardous waste would be performed by permitted hazardous waste haulers and disposal of all hazardous wastes would occur at a RCRA-permitted treatment, storage, or disposal facility, no adverse effects the environment or surrounding communities is anticipated.

Solid Waste and Hazardous Materials Comment 82:

What is Micron doing to prevent hydrogen sulfide and other noxious chemicals from running off the factory into the surrounding community.

Response: See Response to Air Quality Comment 23.

Solid Waste and Hazardous Materials Comment 83:

Commenters requested a list of PFAS that will be used in production at the Proposed Project as well as quantities.

Response: FEIS Section 3.8.3.2 and Appendix L-1 describe the types and instances where PFAS compounds generally will be used in the semiconductor manufacturing process. Specific forms or types of PFAS to be used are not provided due to the highly proprietary nature of this information or are not yet confirmed at this point in the Project development process.

Solid Waste and Hazardous Materials Comment 84:

How are the PFAS and other chemicals used in manufacturing being managed, handled and disposed of. Concerns raised about non-disclosure agreements for trade secret chemicals used and that information is being kept from the public and regulators.

Response: See Response to Solid Waste and Hazardous Materials Comment 83. There are certain chemicals that are proprietary trade secrets and highly confidential business information. Micron does not share proprietary information with the public. As also discussed in FEIS Section 3.8.3.2, Micron will be required to have a policy requiring that its chemical suppliers provide full disclosure of chemical constituents to Micron, which often requires use of non-disclosure agreements. These disclosures are used to manage potential risks to human health and the environment while maintaining confidential business information. Regulatory agencies with permitting authority will have confidential access to specific PFAS compounds used at the Micron Campus and thus would have the ability to assess whether the treatment technology used for the Proposed Project is sufficient to achieve compliance with applicable laws and regulations.

Micron would segregate process solvent waste containing PFAS from Micron Campus wastewater streams to closed bulk storage systems for off-site management by licensed and permitted treatment and disposal facilities. Micron would manage PFAS-containing materials and wastes consistent with the framework discussed in Appendix L-1, and as described in response to Solid Waste and Hazardous Materials Comment 65. Micron would dispose of or otherwise manage waste known to contain regulated PFAS in accordance with applicable state and federal regulations and as appropriate given its content and characteristics. In compliance with EPCRA TRI reporting, Micron would report the manufacture, process, or other use of individual TRI-listed PFAS that exceed reporting thresholds. This would include TRI-listed PFAS compounds.

Solid Waste and Hazardous Materials Comment 85:

Micron should commit to, and NYSDEC should require, evaluation of all available PFAS destruction technologies for use on-site with the goal of implementing one at the point of use. NYSDEC should regulate PFAS destruction systems. The goal of any such system should be zero release.

Response: FEIS Appendix L-1 discusses the framework that Micron will apply for management of PFAS-containing materials and wastes consistent with UESPA's 2024 interim guidance, federal and state regulation (including beneficial use determinations), and Micron Technology's RRR

program to implement its environmental sustainability goals. In sum, there is no one-size-fits-all technology or treatment program for managing PFAS-containing materials. USEPA has developed a framework for “decision-makers who need to identify the most effective means for destroying or disposing of PFAS-containing materials and wastes.” This framework for choosing a technology to destroy, dispose, or otherwise manage PFAS-containing materials considers the type of PFAS (including unknown PFAS), concentration, volume, availability of analytical methods, whether a particular technology is available at the scale needed, engineering controls to prevent or minimize release of PFAS into the environment, performance of the technology being considered, whether there are non-PFAS materials in the waste that may affect the technology’s performance, and other detailed considerations.

It also is not reasonable to uniformly prioritize “destruction” over removal technologies. Treatment may be sufficient if it removes, as opposed to destroys, PFAS. Treatment also may involve some combination of these technologies. Micron continues to assess emerging PFAS wastewater technologies capable of addressing PFAS at the ppt levels found in semiconductor fabrication wastewater and that will meet limits specified in the Micron Campus’s IWDP. See FEIS Section 3.8.3.2; FEIS Appendix L-1. Micron will comply with applicable laws, regulations, and permits in its management and disposal of PFAS-containing materials.

Solid Waste and Hazardous Materials Comment 86:

The DEIS should include a comprehensive analysis of the cumulative impacts of Micron’s PFAS discharges with a focus on the release to Oak Orchard wastewater treatment facilities and, in turn, to surface waters and wastewater biosolids.

Response: FEIS Appendix L-1 discusses cumulative effects of PFAS from the Proposed Project. NYSDEC will determine the SPDES effluent limitations for Oak Orchard IWWTP in accordance with federal, state, and local guidelines to protect surface waters, groundwater, and aquifers. OCDWEP will issue an IWDP to Micron that will require limitations of PFAS and other pollutants prior to discharge to the Oak Orchard IWWTP. Micron’s discharge will be closely monitored to ensure compliance with the Pretreatment Limits set forth by OCDWEP to Micron to protect Oak Orchard IWWTP Treatment Processes and ensure compliance with NYSDEC established discharge limits. See FEIS Section 3.10.1 Legal and Regulatory Setting.

Micron will have industrial wastewater pretreatment facilities on the Micron Campus to reduce or eliminate the quantity of pollutants, including PFAS, being discharged to the IWWTP in accordance with its IWDP issued by OCDWEP. Micron pretreated wastewater will be carefully tested during start up to make sure effluent discharge to the IWWTP is within the compliance parameters set forth by the IWDP. PFAS also would be addressed cumulatively by the other regulatory controls, including appropriate storage and handling of chemicals, and spill prevention planning, as discussed in the FEIS.

Solid Waste and Hazardous Materials Comment 87:

The FEIS should include an estimate of the quantities of fluoropolymers in each fab at Micron, by category of use, as well as life cycle analysis of the environmental impacts from exposure, release, spill, end of life, etc.

Response: See Response to Solid Waste and Hazardous Materials Comment 83; FEIS Appendix L-1.

Solid Waste and Hazardous Materials Comment 88:

Micron should conduct a comprehensive review and documentation of the state of PFAS impacts from use in the semiconductor industry within the country and provide it in the FEIS. 6 NYCRR 617.9(b)(6) requires an analysis of PFAS that summarizes existing credible scientific evidence and the nature and relevance of unavailable or uncertain information given the unique PFAS used for chip manufacturing.

Response: See FEIS Appendix L-1. To the extent that the comment requests additional information unrelated to the Proposed Project, that is beyond the scope of the FEIS.

The cited SEQRA regulation directs that the EIS include reasonably foreseeable catastrophic impacts to the environment. The transportation, use, handling and disposal of PFAS at the Proposed Project would not increase the risk of reasonably foreseeable catastrophic impacts to the environment, as contemplated by 6 NYCRR 617.9(b)(6).

Solid Waste and Hazardous Materials Comment 89:

The DEIS should specify how PFAS and PFCs are recycled, and how non-recycled, insoluble compounds are managed.

Response: Micron would segregate process solvent waste containing PFAS from the Micron Campus wastewater streams to closed bulk storage systems for off-site management by licensed and permitted treatment and disposal facilities. See FEIS Section 3.8.3.2; Appendix L-1. Micron would manage PFAS-containing materials and wastes consistent with the framework discussed in Appendix L-1 and as described in response to Solid Waste and Hazardous Materials Comment 65. Micron would dispose of or otherwise manage waste known to contain regulated PFAS in accordance with applicable regulations and as appropriate given its content and characteristics. In compliance with EPCRA TRI reporting, Micron would report the manufacture, process, or other use of individual TRI-listed PFAS that exceed reporting thresholds. This would include TRI-listed PFAS compounds. See FEIS Section 3.8.3.2, Operational Effects, Hazardous Waste.

See Response to Solid Waste and Hazardous Materials Comment 86; FEIS Appendix L-1.

Solid Waste and Hazardous Materials Comment 90:

Micron should explain why PFAs and PFCs are essential for the manufacturing process. Why aren't alternatives to these chemicals evaluated?

Response: As discussed in FEIS Appendix L-1, semiconductor fabrication involves the use of carefully selected and proprietary chemistries, some of which contain PFAS. Many semiconductor applications depend on PFAS and PFCs due to certain chemical properties—such as low surface tension, high stability, and compatibility. While the specific number and order of processing steps that will be used at the Proposed Project is proprietary, semiconductor fabrication facilities generally follow the same series of doping, deposition, etching, and planarization steps. For example, high-performance PFAS-containing lubricants are essential within the semiconductor manufacturing process because of their ability to meet multiple performance requirements simultaneously, including the need to prevent particle creation and outgassing while providing effective lubrication within the extreme physical environments present in manufacturing processes, and remaining inert to aggressive chemistries used in certain manufacturing process steps. See also NIST, “Final Programmatic Environmental Assessment for Modernization and Expansion of Existing Semiconductor Fabrication Facilities under the CHIPS Incentives Program” (2024) at Appendix C.

Presently, there are no known drop-in substitutes for many critical PFAS uses in semiconductor fabrication. Substitutions will require fundamental changes in the design of processes, materials, and facilities in ways that are currently unknown. Review of alternative chemistries also may involve evaluation of chemistries that introduce other health, safety, and process safety risks. Micron is evaluating potential non-PFAS containing alternatives to the chemistries, equipment, and materials used in semiconductor fabrication. See FEIS Section 3.8.3.2; FEIS Appendix L-1. However, the timelines for replacements of non-PFAS compounds can be extensive or not currently possible, particularly where new chemistries and processes must be invented. This includes partnering with several suppliers to explore non-PFAS alternatives, as well as engagement with the broader semiconductor industry through groups like the World Semiconductor Council (WSC), the Semiconductor Industry Association’s PFAS Consortium, SEMI, and the National Science Foundation/ Semiconductor Research Corporation, as further discussed in Micron Technology’s 2025 Sustainability Report (chemical management).

Solid Waste and Hazardous Materials Comment 91:

Rather than focusing narrowly on whether identical PFAS substitutes exist, Micron should conduct a rigorous alternatives assessment that considers process redesign, material substitution, and other innovative solutions. A commitment to eliminating PFAS where safer options exist should be a minimum requirement for a project of this scale.

Response: See Response to Solid Waste and Hazardous Materials Comment 90. FEIS Appendix L-1 discusses challenges and timelines for identifying non-PFAS alternatives that meet functionality requirements, as well as Micron’s efforts to identify non-PFAS alternatives. These efforts include engagement with government and industry groups to identify non-PFAS alternatives and innovation.

Solid Waste and Hazardous Materials Comment 92:

The appropriate NY State agency and/or corresponding Federal agency need to work together with Micron and its competitor manufacturers of chips to identify alternatives to PFAS and PFCs that are less harmful to humans and the natural environment and, in the future if identified and marketed, agree to use PFAS and PFC replacement substances and chemicals if overall benefits exceed costs. Micron should support research and pilot projects to understand interactions of PFAs and PFCs with the environment, as well as methods to treat them or eliminate their use.

Response: See Responses to Solid Waste and Hazardous Materials Comment 90 and 91. See also Response to Water Resources Comment 29.

Solid Waste and Hazardous Materials Comment 93:

Major uncertainties including location and intensity of development sparked by this project, success of wetlands, PFAS discharge in wastewater, stormwater management plans, air pollutant criteria, spills and upset, and so on. Micron has committed to adaptive management for issues managing groundwater and storm water but does not commit to public sharing on-going monitoring efforts and updates with the public and outside experts.

Response: The uncertainties identified by the comment are typical of industrial project planning and implementation at this scale. The FEIS contains an analysis of the reasonably foreseeable growth impacts, and socioeconomic effects of the Proposed Project, consistent with the requirements of NEPA and SEQRA.

Mandated wetland replacement/mitigation measures would be enforceable commitments should the U.S. Army Corps issue a Section 404 wetlands permit. Such commitments are also anticipated to be conditions of any NYSDEC-issued wetlands permit. As explained in the FEIS, an approved SWPPP would be required to enable the applicant to manage stormwater runoff from the Micron Campus. In addition, adaptive management practices are a well-accepted supplementary method for ensuring that actual environmental impacts of a proposed action remain within acceptable levels and are not indicative of an analytical or other deficiency. Additional opportunities for public input are anticipated in conjunction with further permitting applications and more detailed design when more information is known.

OCDWEP utilizes the USEPA Enforcement and Compliance History Online (ECHO) database system, a public web database that publishes environmental compliance information for regulated facilities across the United States, including OOWWTP. This data is currently available and will be available during future operations.

Solid Waste and Hazardous Materials Comment 94:

The DEIS should specify the wastewater treatment technologies and plan to be used, including their projected treatment efficiencies for each chemical being managed, with the goal of pretreating PFAS in wastewater down to the lowest technically feasible and achievable. Given that conventional wastewater treatment plants cannot effectively treat PFAS, Micron must prevent off-site discharges of PFAS-contaminated wastewater.

Response: See Responses to Water Resources Comments 35 and 41; Responses to Solid Waste and Hazardous Materials Comments 80 and 89; FEIS Appendix L-1.

Solid Waste and Hazardous Materials Comment 95:

Micron must commit to phasing out all PFAS chemicals, not just those currently regulated, and prioritize non-PFAS alternatives wherever technically feasible. Substituting one PFAS chemical for another is not acceptable.

Response: See Response to Solid Waste and Hazardous Materials Comment 90; see also FEIS Appendix L-1, which discusses challenges and timelines for identifying non-PFAS alternatives that meet functionality requirements, as well as Micron's efforts to identify non-PFAS alternatives. These efforts include engagement with government and industry groups to identify non-PFAS alternatives and innovation.

Solid Waste and Hazardous Materials Comment 96:

Commenter requested information on whether any PFAS chemicals will be discharged into the Seneca River.

Response: The Proposed Project is not located within the Seneca River watershed, in which the Seneca River is part of. See also Response to Water Resources Comment 47.

Solid Waste and Hazardous Materials Comment 97:

Micron should support research and pilot projects to understand interactions of PFAs and PFCs with the environment, as well as methods to treat them or eliminate their use. The DEIS states that state of the art technology will be used by Micron to remove PFAS, however, there is no known technology that removes PFAS or other harmful chemicals on an industrial scale.

Response: See Responses to Solid Waste and Hazardous Materials Comments 89 and 92; FEIS Section 3.8.3.2; FEIS Appendix L-1. Micron is actively working with government and industry groups to advance methods for accurately identifying and quantifying PFAS in various media. Due to rapidly evolving PFAS wastewater treatment technology, Micron continues to assess emerging technologies and will select appropriate solutions for the Proposed Project as project design progresses. See also Responses to Water Resources Comments 33 and 34.

Solid Waste and Hazardous Materials Comment 98:

Micron should provide more information about the type and amount of PFAS that are used in the production processes in its other facilities and the amount and type found in those waste streams. Unless Micron can demonstrate otherwise, the DEIS should assume that all -- or a percentage based on past experience -- of this PFAS will escape detection or capture by any industrial wastewater treatment plant and assess the impacts of its discharge into the environment.

Response: See Responses to Solid Waste and Hazardous Materials Comments 9, 83, and 89. Even after the Proposed Project is operational, the specific types and amounts of chemicals will likely change as new chip technologies are adopted and, therefore, reference to other facilities would not be applicable. As discussed in FEIS Section 3.8.3.2, Micron requires its chemical suppliers to provide full disclosure of chemical constituents to Micron, which often requires use of non-disclosure agreements. These disclosures are used to manage potential risks to human health and the environment while maintaining confidential business information. Regulatory agencies with permitting authority will have confidential access to specific PFAS compounds used at the Micron Campus and thus would have the ability to assess whether the treatment technology used for the Proposed Project is sufficient to achieve compliance with applicable laws and regulations.

The FEIS assesses the potential impacts to various media (e.g., soil, wastewater, surface water) from the transport, storage, handling, use and disposal of PFAS at the Proposed Project and Connected Actions to the extent reasonable and feasible in light of the continued emergence of regulation, treatment technology and scientific information. See FEIS Sections 3.8.3.2, 3.3.4.2; FEIS Appendix L-1. Micron and the agencies implementing the Connected Actions and proposed environmental mitigation measures would be subject to ongoing federal, state, and local regulatory oversight, including permit conditions that require compliance with current and future environmental standards. These regulatory frameworks incorporate mechanisms such as permit renewals, inspections, and reporting, enabling agencies to address changing environmental conditions and operational practices. Any changes in operations or environmental conditions would be addressed through applicable permitting processes, which will apply current law and regulations and are designed to reflect current science and best practices.

Solid Waste and Hazardous Materials Comment 99:

The regulations are focused on two compounds - PFOA and PFAS - which are not used by the chip industry any longer, as noted by the CHIPS office in their environmental assessment, so the Project sponsors are looking at the wrong set of compounds in their analysis.

Response: See Response to Water Resources Comment 38. The FEIS does not use any definitional framework to exclude PFAS types from consideration. See FEIS Sections 3.8.3.2. The FEIS's analysis and Micron's ongoing assessment of available PFAS technologies capable of achieving compliance with potential permit limits are not limited to those technologies effective on only currently-regulated PFAS or to any subset of PFAS for which approved analytical methods exist. Limits and controls established for specific PFAS prioritized for regulation would reasonably be

expected to provide benefits and adequate levels of protection for other PFAS as well. Micron will continue to comply with all applicable law, including any additional future regulation of PFAS.

Solid Waste and Hazardous Materials Comment 100:

The EIS must rely on a science-based class definition of PFAS already enshrined in multiple provisions of New York State law.

Response: See Response to Water Resources Comment 23. FEIS Section 3.8.3.2 and Appendix L-1 discuss various PFAS definitions, all of which are science-based definitions that capture most substances that potentially may be considered PFAS. These definitional frameworks are also discussed in NIST's "Final Programmatic Environmental Assessment for Modernization and Expansion of Existing Semiconductor Fabrication Facilities under the CHIPS Incentives Program" (2024). While the FEIS does not adopt a specific PFAS definitional framework, it also does not use these frameworks to exclude PFAS types from consideration. The FEIS identifies instances where PFAS compounds, broadly defined, generally are used in the semiconductor manufacturing process. See FEIS Section 3.8.3.2; FEIS Appendix L-1. Sufficient information has been provided to identify PFAS use and management, and to address the potential risks and procedural controls in place to manage the risk associated with using these materials.

Solid Waste and Hazardous Materials Comment 101:

Commenter stated that EPA method 1633 is inadequate in the detection of more than 40 PFAS chemicals in soil, water, and biological tissue, and Micron should be subject to a broader spectrum testing procedure that can identify scores more PFAS compounds than EPA method 1633, especially since the semiconductor industry reportedly utilizes hundreds, if not thousands of PFAS compounds.

Response: See Responses to Water Resources Comment 38; Response to Solid Waste and Hazardous Materials Comment 99. As discussed in FEIS Section 3.8.3.2 and Appendix L-1, government and industry groups, including semiconductor trade groups in which Micron actively participates, are working to advance the development of validated methods for accurately identifying and quantifying PFAS in various matrices, including wastewater. Presently, EPA Method 1633A is the only standardized validated method for analyzing PFAS in industrial wastewater. NYSDEC requires PFAS monitoring as provisions in its permits, including quarterly sampling for approximately 40 compounds, using EPA Method 1633 and leveraging state guidance values (e.g., 10 ppt for PFOA/PFOS). See NYSDEC, Emerging Contaminants in NY, available at <https://dec.ny.gov/environmental-protection/water/emerging-contaminants>.

Solid Waste and Hazardous Materials Comment 102:

Commenter stated that regulation of PFAS by the federal and state government are underway, while both entities continue to provide financial subsidies to "known" generators of PFAS. As it relates to the Micron project, commenter requested that Micron explain this discrepancy.

Response: See Response to Purpose and Need Comment 2; Response to Solid Waste and Hazardous Materials Comment 90; FEIS Appendix L-1.

Solid Waste and Hazardous Materials Comment 103:

Page 3-241: The commenter requests further information on what suite of PFAS compounds is proposed to be used along with a material balance showing the supply and disposition of the individual PFAS components. If Micron cannot find an acceptable disposal facility, PFAS wastes will need to be stored at the facility for prolonged period of time or properly stored somewhere and this needs to be discussed in the Final EIS. Recommend that Micron verify with each disposal facility whether the disposal facility will accept wastes that contain PFAS. The text should explicitly mention that the TRI listed PFAS compounds represent a very small fraction of all PFAS compounds, and specifically what fraction of PFAS compounds used at the facility will be subject to TRI reporting.

Response: See Responses to Solid Waste and Hazardous Materials Comments 89 and 98; FEIS Section 3.8; FEIS Appendix L-1.

FEIS Section 3.8.3.2 and Appendix L-1 identify and discuss a range of wastewater treatment technologies for use prior to discharge to the IWWTP and materials management and disposal options for different types of materials that may be generated by the Proposed Project, which may include PFAS-containing materials. USEPA's current "Interim Guidance on the Destruction and Disposal of Perfluoroalkyl and Polyfluoroalkyl Substances and Materials Containing Perfluoroalkyl and Polyfluoroalkyl Substances" describes the agency's latest assessment of available methods for treatment and management of PFAS-containing materials. Micron will use this and other guidance to assess suitable methods for disposal and management of PFAS-containing material and will comply with applicable law for the safe and proper disposal of any generated solid and hazardous waste.

FEIS Section 3.8 explains that non-hazardous sludge from on-site wastewater treatment would be sent to a beneficial use vendor or recycled. See also FEIS Table 3.8-5. For any hazardous waste, permitted private hazardous waste haulers would collect hazardous waste and bring it to facilities authorized by NYSDEC or analogous out-of-state regulatory agencies for disposal in accordance with RCRA regulations. Because transport of all hazardous waste would be performed by permitted hazardous waste haulers and disposal of all hazardous wastes would occur at a RCRA-permitted treatment, storage, or disposal facility, no adverse effects to the environment or surrounding communities are anticipated.

TRI reporting requirements are further discussed in FEIS Section 3.8.3.2 and Appendix L-1. Micron would be required to submit TRI data using Form R reports to USEPA by July 1 of each year identifying the chemicals subject to the TRI used on-site and describing the toxic chemical management and release prevention activities that occurred on-site during the previous calendar year, information which USEPA would make publicly available.

Solid Waste and Hazardous Materials Comment 104:

What is the likelihood that the fabs planned for later development in Clay will be designed without the need for fluorochemicals? Is there a plan or timeline for substitution of PFAS, and development of alternatives?

Response: As discussed in FEIS Section 3.8.3.2 and Appendix L-1, Micron is evaluating potential non-PFAS containing alternatives to the chemistries, equipment, and materials used in semiconductor fabrication. This includes partnering with several suppliers to explore non-PFAS alternatives, as well as engagement with the broader semiconductor industry through various groups, as described in Micron Technology's 2025 Sustainability Report. Presently, there are no known drop-in substitutes for many critical PFAS uses in semiconductor fabrication.

Micron also currently does not plan to use surfactants in wet etch for high-volume DRAM manufacturing. If surfactants are needed for wet etch in future DRAM tech nodes, Micron plans to consider non-PFAS alternatives, where feasible. Micron is also working with various semiconductor industry groups to investigate PFAS uses in applications throughout the manufacturing process, research the innovation and feasibility of substitutes, explore opportunities to reduce or eliminate PFAS use, and pursue pollution prevention and treatment options, as discussed in Micron Technology's 2025 Sustainability Report.

Solid Waste and Hazardous Materials Comment 105:

The DEIS did not include discussion of helium usage in CHIP manufacturing, and if not, the FEIS should.

Response: Helium is used in the manufacturing process as a carrier gas, heat transfer medium, as well as a film treatment. The general semiconductor industry demand and shortening supply of helium does raise concerns regarding the sustainability of helium supply chains. The list of example liquid and gas chemicals to be used at the Micron Campus has been updated to include helium. Micron has and will continue to evaluate potential alternative gases and process changes to transition away from helium dependence in certain processes.

Solid Waste and Hazardous Materials Comment 106:

Page 3-236, Table 3.8-6: Describe which category of wastes containing PFAS will fall under (e.g., RR, non-hazardous or hazardous) and provide information to support the estimated disposal volumes.

Response: It is anticipated that the Proposed Project will generate both non-hazardous and hazardous waste. FEIS Section 3.8.3.2 and Appendix L-1 identify and discuss a range of disposal options for different types of generated waste at the proposed Micron Campus. In sum, there is no one-size-fits-all technology or treatment program for managing PFAS-containing materials. USEPA has developed a framework for "decision-makers who need to identify the most effective means for destroying or disposing of PFAS-containing materials and wastes." This framework for choosing a technology to destroy, dispose of, or otherwise manage PFAS-containing materials considers the type of PFAS (including unknown PFAS), concentration, volume, availability of

analytical methods, whether a particular technology is available at the scale needed, engineering controls to prevent or minimize release of PFAS into the environment, performance of the technology being considered, whether there are non-PFAS materials in the waste that may affect the technology's performance, and other detailed considerations. USEPA's current interim guidance on PFAS destruction and disposal describes the agency's latest assessment of the available methods for treatment and management of PFAS-containing waste. Micron will be required to have a program to manage such materials consistent with the applicable regulatory requirements and this framework discussed in FEIS Appendix L-1.

Solid Waste and Hazardous Materials Comment 107:

A commenter notes that the DEIS outlines general commitments to implement a Risk Management Plan (RMP) and to coordinate with the Syracuse Fire Department's hazardous materials unit. The DEIS states that Micron expects its RMP to cover eight federally regulated substances, including hydrogen fluoride (HF), chlorine, and anhydrous ammonia. However, it omits other substances commonly used in fabs, such as arsine and phosphine, which may be lethal in small concentrations and are subject to more stringent thresholds under California's regulations. The commenter also notes that the DEIS leaves key questions remain unanswered, such as: Will the RMP include all regulated substances and extremely hazardous substances regardless of federal thresholds? Micron should include a full chemical inventory in the RMP and emergency response planning.

Response: See Response to Solid Waste and Hazardous Materials Comments 9 and 39; Response to Air Quality Comment 22.

Solid Waste and Hazardous Materials Comment 108:

The DEIS refers to internal banned and restricted chemical lists as part of Micron's best management practices provided for hazard control measure examples (p. 3-258). Consistent with a precautionary approach, Micron should include in its RMP not only any regulated substances, but also any chemicals it deems hazardous through its own internal evaluations—whether listed as restricted or banned or simply identified as potentially hazardous—regardless of their status under current federal or state regulations.

Response: Descriptions of the types of chemicals used onsite have been provided in FEIS Section 3.8.3.2 and Appendix L-1. FEIS Section 3.8 includes a discussion and analysis of the federal requirements associated with hazardous chemicals, including RMP requirements, and how the Project will comply with these requirements. Micron's RMP will address those chemicals regulated as "extremely hazardous substances" that are used in covered processes in quantities above threshold levels. Other unidentified emerging contaminants are not subject to USEPA's Risk Management Program regulations. Micron would evaluate and add chemicals to the RMP on a case-by-case basis. See also Responses to Solid Waste and Hazardous Materials Comments 9 and 99; Response to Air Quality Comment 22.

Solid Waste and Hazardous Materials Comment 109:

The DEIS does not disclose details of Micron's internal programming for managing hazardous and restricted substances. The DEIS provides no decision criteria, oversight structure, examples of restricted substances or indicators of how workers or regulators will verify compliance.

Response: The FEIS contains sufficient detail about Micron's internal hazardous material management programming, including engineered solutions, permissive exposure limits, administrative controls, incorporation of and adherence to OSHA compliance standards, and PPE. See FEIS Section 3.8.3.2. See also Response to Solid Waste and Hazardous Materials Comment 108.

3.9 Human Health & Safety**Human Health & Safety Comment 1:**

Commenters expressed general concerns regarding harm to Micron workers and harms or health consequences to the community caused by exposure to chemicals, including PFAs, used in manufacturing. The chemicals used by Micron are harmful to humans. The DEIS does not sufficiently address impacts to the community and does not detail how Micron will protect worker health and safety given the intensive use of chemicals in semiconductor production. Micron must commit to the highest safety standards to the facility and employees. The semiconductor manufacturing process is dependent on use of thousands of chemicals posing serious risk to workers and community safety. The DEIS falls short in specificity, transparency, and accountability to meaningfully assess and mitigate occupational health and safety risks.

Response: The lead agencies acknowledge the stated concerns. The FEIS therefore evaluates the potential harm to both workers and the general public due to Micron's proposed storage, use, handling and disposal of chemicals, including PFAS.

Micron will be required to comply with all applicable laws and regulations concerning the storage, use, handling and disposal of chemicals, including PFAS. See, e.g., FEIS Section 3.9.1 (Legal and Regulatory Setting); FEIS Appendix L-1. Beyond legal and regulatory compliance, the lead agencies will require Micron to implement a wide variety of safety standards and programs, many exceeding applicable regulatory requirements. These required risk management measures, hazard control measures, and emergency management programs will avoid and minimize to the maximum extent practicable the potential for impacts to workers and the community. See FEIS Section 3.9.3. Examples of risk management controls include, but are not limited to, use of process enclosure, interlocks, continuous monitoring and shielding. See FEIS Table 3.9-2. Examples of hazard control measures include, but are not limited to, elimination or removal of hazards, substitution of use of alternatives, engineered controls, administrative or work practice controls, and use of protective equipment. See FEIS Table 3.9-3; FEIS Appendix L-2.

Because of these stricter regulations on emissions of toxic and hazardous substances, advancements in modern semiconductor equipment safety controls, and disposal of those

substances, “the U.S. semiconductor industry incident rate is substantially lower than the U.S. manufacturing and economic sector incident rates, and semiconductor industry incident rates have steadily declined over the past three decades.” See FEIS Section 3.9.3.2.

Micron’s Global EHS program, and its EHS team would be responsible for reviewing the facility’s engineering design and developing occupational safety and health procedures, protocols, and training in accordance with OSHA, USEPA, and NYS Labor Law Article 27 requirements, including for worker health and safety, the handling and storage of chemicals, and the response to potential spills. Micron would also implement chemical monitoring and exposure controls in the fabs based on more protective standards than the OSHA permissible exposure limits (PELs). See also Response to Human Health and Safety Comment 4. In addition, Micron would manage potential risks from use and operation of semiconductor manufacturing equipment in accordance with the Semiconductor Equipment and Materials International (SEMI) S2 standard, which serves as the semiconductor industry-wide EHS guideline for semiconductor manufacturing equipment and covers installation, gas effluent handling, exhaust ventilation, fire risk avoidance and minimization, and electrical design and hazards. Micron would require its semiconductor manufacturing equipment suppliers to provide SEMI S2 compliance reports prior to equipment purchase to ensure that all equipment at the Micron Campus would meet the standards and industry best practices.

In addition to chemical exposure limits and protection measures, Micron would implement a comprehensive industrial hygiene (IH) program to control environmental factors or stressors in the workplace that could lead to discomfort, illness, or impaired health. The EHS team would be responsible for verifying the implementation and effectiveness of IH controls, such as worker health monitoring systems. Micron would incorporate all applicable OSHA general industry standards, including noise protection standards to protect employees from potential hearing damage from prolonged exposure to loud machinery and equipment in the fabs, including cleanroom environments where specialized tools and ventilation systems can generate high noise levels. Micron would install equipment noise reduction features and enclosures around loud equipment, provide hearing protection to employees, and incorporate noise safety protocols as part of workplace monitoring and training programs. In addition, applicable OSHA respiratory protection standards are followed to protect and reduce employee potential exposure to airborne contaminants. The EHS team would evaluate the use and applicability of respiratory protection as part of the hierarchy of safety controls for reducing exposure and risk. FEIS Table 3.9-4 lists additional IH program measures that would be implemented at the Micron Campus.

Also discussed in FEIS Section 3.9.3.2, Operational Effects, Micron would seek ISO 45001 and 14001 certifications for the Micron Campus, consistent with certifications at its existing facilities, which are globally certified to ISO 45001:2015 and ISO 14001:2015. ISO 45001 is the international standard for occupational health and safety and incorporates leadership commitment, worker participation, hazard identification and risk assessment, legal and regulatory compliance, emergency planning, incident investigation, and continual improvement standards. ISO 14001 is the international standard for environmental management systems and incorporates environmental compliance, resource use, waste management, monitoring, training, employee engagement, and stakeholder communication standards. Conformance to these standards is audited on a routine basis by a third party.

Micron would apply additional safety standards that exceed applicable regulatory requirements to address potential hazards associated with semiconductor process chemical exposure. For example, Micron would implement chemical monitoring and exposure controls in the fabs based on more protective standards than the OSHA permissible exposure limits (PELs).

Micron would establish a Workplace Safety Committee (WSC) to foster collaboration among management and employees and a structured process to proactively identify and address potential hazards and raise any safety concerns with oversight by the NYSDOL Safety, Health, & Essential Rights Program. The WSCs established in accordance with ISO 45001 and 14001 certification standards would be audited by a third party.

See also Responses to Solid Waste & Hazardous Materials Comment 4, and 48, and Water Resources Comment 29; FEIS Appendix L-1.

The comprehensive suite of risk management, hazard control, exposure controls and EHS programs mentioned above, and further discussed in the FEIS would protect workers and the community from potential chemical, including PFAS, exposures.

Human Health & Safety Comment 2:

The long-term effects of PFAs are not understood. Most chemicals introduced for industrial or other use are not tested in advance for health and safety impacts. There is no testing of chemical combinations.

Response: See Response to Human Health & Safety Comment 1. The generally applicable exposure controls identified in the FEIS would also protect workers and the community from potential PFAS exposures, individual chemicals, and combinations of chemicals. See FEIS Tables 3.9-2 and 3.9-3. These include use of enclosed automated chemical delivery systems (which physically separate workers from the production process) to minimize potential worker safety risks and exposures.

The FEIS appropriately identifies and discusses the laws and regulations to which the Proposed Project will be subject, including air emission monitoring, wastewater permitting and accompanying monitoring, required spill prevention protocols, and the reporting regimes that accompany federal, state and local regulatory programs. These programs include regulation of PFAS, as discussed in FEIS Section 3.8.3.2 and FEIS Appendix L-1. The FEIS also discusses the review of PFAS treatment options that go beyond what is currently legally mandated. The options under review are not limited to treatment of only those PFAS subject to drinking water limits. Also, NYSDEC requires PFAS monitoring as provisions in its permits, including quarterly sampling for approximately 40 compounds using EPA Method 1633 and leveraging state guidance values (e.g., 10 ppt for PFOA/PFOS). See <https://dec.ny.gov/environmental-protection/water/emerging-contaminants>. This will then be reflected in Micron's IWDP issued by OCDWEP which will include effluent limits as well as monitoring and reporting. Any additional future regulation of PFAS is speculative, though Micron will be required to comply with all applicable laws. Micron will also explore technological innovation to reduce or eliminate PFAS from semiconductor manufacturing.

For chemicals more broadly, Micron's Risk Management Program would include pre-task planning (PTP), job hazard analyses (JHA), permit-to-work (PTW), critical risk checklists, and PPE. Micron EHS professionals would be responsible for conducting risk assessment reviews consistent with the PTP, JHA, and PTW procedures. These measures would be applied across the fabs consistent with the NIOSH hierarchy of controls. See FEIS Section 3.9.3.2.

As referenced in FEIS Section 3.9.1, the Toxic Substances Control Act (TSCA) requires the USEPA to evaluate new and existing chemicals to identify unreasonable risks of injury to health or the environment. Manufacturers must submit premanufacture notices for new chemical substances, and EPA may impose restrictions, require additional testing, or prohibit manufacture if data are insufficient to permit a reasoned evaluation of the health and environmental effects of a chemical substance.

Human Health & Safety Comment 3:

The DEIS should also address how toxic chemicals will be stored and handled pre-production to ensure the safety of Micron employees and the environment.

Response: Hazardous materials would be stored in the HPM buildings associated with each fab. See FEIS Section 3.8.3.2, Operational Effects, Hazardous Materials. Table 3.8-10 lists the quantities and storage methods for specific types of liquid and gaseous chemicals that would be stored on-site. Table 3.8-9 lists the types of hazardous materials that would be used in the manufacturing process at the Micron Campus, the potential hazards associated with each part of the process, and the controls that would be used to protect worker and public health and safety.

Micron would be required to manage the delivery of hazardous materials to the Micron Campus and their shipment for off-site disposal under the HMTA, USDOT, and NYSDOT regulations. Micron would apply for USDOT registration with the Pipeline and Hazardous Materials and Safety Administration and develop a Safety and Security Plan to adopt relevant personnel and facility security measures and provide USDOT training for relevant personnel (49 C.F.R. § 172.802). Chemicals would be delivered to the Micron Campus by truck (see Appendix K-6 for information on anticipated truck routes to and from the campus) using a variety of packaging and containment methods, including tanks, drums, and pallets. Micron would maximize the use of closed systems and automation for chemical delivery in accordance with industry standards and would install and maintain leak detectors and employ toxic gas monitoring for hazardous chemical and gas delivery systems in accordance with State and international fire codes.

Once on the Micron Campus, Micron would store hazardous chemicals in the specially designed HPM buildings as noted above, which would include secondary containment measures, and would track the chemicals as they are transferred to and used in the fabs through an automated chemical management system equipped with unintentional release detection and control mechanisms. Micron would contract with carriers and shippers of hazardous materials that maintain 24/7 emergency response support in the event of hazardous materials spills prior to and during transit, and appropriate incident reporting protocols.

Additional storage and handling of chemicals preproduction will be dictated by the joint Spill Pollution Countermeasures & Control (SPCC) Plan, Spill Prevention Report (SPR), and Process

Safety Plan. As identified in Table 3.9-2, toxic hazards would also be addressed through the following risk managing measures, which include but are not limited to process enclosures, interlocks, local exhaust / ventilation, automation, and continuous monitoring.

Human Health & Safety Comment 4:

The DEIS does not disclose a full list of chemicals that will be used at the facility and does not include job-specific exposure assessments or risk matrices. Without this information, it is impossible to evaluate or comment on exposure risks or to establish adequate monitoring protocols. Micron should include hazard classifications, associated job functions or departments, storage methods and waste treatment or disposal pathways. Micron must take into consideration workplace safety. Micron must adopt detailed plans to minimize negative impacts to workers, including providing robust worker training and safety protocols. Key safety documents and hazard procedures remain inaccessible or incomplete.

Response: See also Response to Solid Waste and Hazardous Materials Comment 9 and 40, regarding chemical transparency; Response to Solid Waste and Hazardous Materials Comment 5, providing federal and state required plans.

FEIS Section 3.9.3.2, Operational Effects, indicates that to “address potential hazards associated with semiconductor process chemical exposure, Micron would implement chemical monitoring and exposure controls in the fabs based on more protective standards than the OSHA permissible exposure limits (PELs). An OSHA PEL is a legal limit for exposure of an employee to a chemical substance or physical agent that represents the maximum allowable concentration or level of a substance that a worker can be exposed to over a specific time period without experiencing adverse health effects, and is usually expressed as an eight-hour, time-weighted average exposure limit. In developing its safety procedures for the Proposed Project, Micron shall incorporate the most protective occupational exposure limit (OEL), pursuant to the American Conference of Governmental Industrial Hygienists (ACGIH) threshold limit values (TLVs), biological exposure indices (BEIs), or Micron's own limit if lower than the ACGIH TLVs, for the chemicals used in the facility manufacturing processes for the relevant scenarios (e.g., overarching, equipment-specific, or task specific) in which they are applied. To ensure maximum worker exposure protection, Micron would install toxic gas monitoring systems, exposure detection and evacuation alarms, and automatic equipment shutdown mechanisms based on these exposure limits and Immediately Dangerous to Life and Health (IDLH) atmospheric concentration values.”

Micron will employ Industrial Hygienists who evaluate and control those environmental factors or stresses arising in or from the workplace which may cause sickness, impaired health and well-being, or significant discomfort among workers or among citizens of the community. Industrial Hygienists collect information on potential hazard sources, exposure pathways, magnitude, frequency and duration of worker exposures. Industrial Hygienists analyze this information to identify the risk of negative health effects of exposures; determine options for controlling the sources, pathways, and exposures; and provide the risk and options required to control these risks. In addition, workplace medical surveillance programs would be utilized as needed in conjunction with the established medical clinic professionals.

Human Health & Safety Comment 5:

The DEIS and Appendix L provides a baseline for construction-phase safety but lacks critical operational-phase health, safety and environmental details.

Response: See Response to Human Health & Safety Comment 25.

Human Health & Safety Comment 6:

A commenter requests that Micron include an operational-phase Occupational Health & Safety Management Plan with: 1) formal, paid worker participation in health and safety committees, 2) employee and on-site contractor training on applicable Safety Data Sheets (SDS) in multiple languages and formats, 3) a detailed medical surveillance program managed by an occupational medicine physician, 4) air and water monitoring protocols for priority contaminants including PFAS, 5) a safety training facility and comprehensive training plan managed by Micron that includes ongoing operation of the facility beyond construction activities, 6) inclusion of at least one Certified Industrial Hygienist (CIH) as mandatory expertise on the Micron EHS team, and 7) annual public reporting of worker injury/illness rates (public access to OSHA 300 Logs).

Response: Micron will establish worker safety and health committees in accordance with ISO 45001 and 14001. See FEIS Section 3.9.3.2. Micron's internal Safety and Health policies also require establishment of team member lead health and safety committees that meet on a regular cadence, discuss events and concerns, and educate workers. The Micron Code of Business Conduct and Ethics oversees multiple channels for reporting ethics and compliance concerns – to include anonymous reporting of safety concerns. This is done through an anonymous hotline. Micron will also be required to follow applicable standards related to hazard communication. See FEIS Table 3.9-1 and Appendix L-2. OSHA Hazard Communication Standard 29 CFR 1910.1200(g) requires employers to ensure that SDS are readily accessible to employees in work areas and to provide training to help them find and understand information. SDS are required by chemical manufacturers to be provided to downstream customers. Further, Micron will establish an occupational medical clinic. See FEIS Section 3.9.3.2.

See Responses to Human Health & Safety Comments 1 and 2 and FEIS Sections 3.9.2 and 3.9.3.2 and FEIS Appendix L-1. Micron employs the Semiconductor Equipment and Materials International (SEMI) S2 standard, which establishes standards for design and installation of manufacturing processes to avoid or reduce workplace hazards, including for gas effluent handling, exhaust ventilation, fire risk avoidance and minimization, and electrical design and hazards. These efforts include use of enclosed automated chemical delivery systems (which physically separate workers from the production process) to minimize potential worker safety risks and exposures. Micron would also use advanced leak detection and employ toxic gas monitoring for hazardous chemical usage.

For PFAS, see comment Responses for Section 3.8. Solid Waste, Hazardous Waste, and Hazardous Materials, including Comment 40; FEIS Appendix L-1. Generally, PFAS-containing compounds are a component of other chemistries used in the facility, whereby generally applicable exposure controls would also protect workers from potential PFAS exposures. More generally, Micron

controls and mitigates chemical and process hazards in the workplace by employing the principles of the NIOSH Hierarchy of Controls (i.e., elimination, substitution, engineering, administrative, and personal protective equipment (PPE)), as well as USEPA's waste management hierarchy for source reduction, reuse, recycling, treatment and disposal. Micron incorporates these approaches in its evaluation and approval of chemical usage. PFAS also would be addressed cumulatively by the other regulatory controls, including appropriate storage and handling of chemicals, and spill prevention planning, as discussed in the FEIS.

Micron employs safety professionals, industrial hygienists, and emergency responders. Micron currently employs certified safety professionals (CSP), certified industrial hygienists (CIH), as well as emergency responders – basic (EMT-B) who are nationally and state certified. Micron will also provide safety training to workers in accordance with all local, state and federal regulations, as discussed throughout the FEIS.

As referenced in FEIS Section 3.9.1 and Appendix L-2, OSHA requires employers with more than 10 employees to maintain an injury log using Form 300 (log), Form 300A (Annual Summary), and Form 301 (Incident Report) to track worker-related injuries and illnesses. Form 300A summary must be posted in a conspicuous place in the workplace.

Human Health & Safety Comment 7:

A commenter indicates that although the DEIS notes significant hazardous waste generation and outlines a Hazardous Waste Training Procedure, it focuses on regulatory compliance rather than exposure prevention. There is no detail provided on what specific waste streams workers will handle, and there is little detail provided on how the Hierarchy of Controls will be applied to individual hazards. Micron's Reuse, Recycle, and Recovery (RRR) program is mentioned, but it lacks a discussion of hazards in reuse/recycling operations and the training needed to perform them safely. The commenter requests [that Micron]: 1) Specify hazardous waste streams, their associated hazards, and controls, 2) make Micron's hazardous waste procedures publicly available, and 3) require initial and annual refresher hazardous waste training for all affected employees and contractors.

Response: Micron's EHS team would be responsible for reviewing the facility's engineering design and developing occupational safety and health procedures, protocols, and training in accordance with OSHA, USEPA, and NYS Labor Law Article 27 requirements. See FEIS Section 3.9.3.2, Operational Effects. This would include hazardous waste training. See Section 3.8, Solid Waste, Hazardous Waste, and Hazardous Materials, for more detail on hazardous waste and material.

Because the Micron Campus would be a large quantity hazardous waste generator, Micron also would be required to implement a Hazardous Waste Contingency Plan (HWCP) to minimize hazards to the environment or human health from exposure to hazardous waste in the event of a fire, explosion, or release of any hazardous materials (see 40 C.F.R. Pt. 262, Subpart M; 6 NYCRR §§ 372.2(a), 373-3.3, and 373-3.4). Micron would prepare the required plans approximately six months before operations would be anticipated to begin, as sufficient design detail needed to

prepare adequate plans will be available at that time. Micron has prepared an initial outline of its HWCP. See FEIS Appendix K-9.

For hazardous waste management, the USEPA RCRA regulatory standards would be reviewed and implemented. As such, RCRA training requires personnel to be instructed on their specific hazardous waste management duties, including emergency procedures within 6 months of hire. Annual refresher training is also required for affected employees. Under the RCRA regulations regulation, the facility is required to keep comprehensive records to verify that training has been completed. For example, under RCRA, the facility is required to have training, procedures, inspections, contingency plans, job hazard analyses, and emergency response plans. Emergency Response Teams would be trained in HAZWOPER (Hazardous Waste Operations and Emergency Response) an Occupational Safety and Health Administration (OSHA) standard that establishes safety requirements for workers who handle hazardous substances and respond to emergencies involving them. It requires training and other protective measures to reduce the risk of illness and injury from exposure to hazardous materials during cleanup operations, treatment, storage, and disposal of hazardous waste, and emergency response to hazardous substance releases. See FEIS Sections 3.8, 3.9, 3.14, and FEIS Appendix L.

Human Health & Safety Comment 8:

A commenter notes that ergonomic risk is minimally referenced in the EIS and Appendix L, despite evidence that integrating ergonomics into initial facility design reduces injury rates and retrofit costs, while also improving employee performance and well-being. The commenter requests that Micron: 1) engage a Certified Professional Ergonomist during facility design - recommended ergonomics expertise includes physical, cognitive, and macro ergonomics, 2) integrate adjustable workstations, manual material handling aids, and human factors into equipment selection, and 3) include ergonomic training in both construction and operations phases.

Response: The comment raises an issue that is outside the scope of environmental review of the project under SEQRA/NEPA. Ergonomics is considered a process hazard and an industrial hygiene program health and safety element for the facility. See FEIS Section 3.9.3.2 and in Tables 3.9-2. Micron will maintain an internal comprehensive ergonomics program and staffing that addresses all the above-referenced concerns.

Human Health & Safety Comment 9:

A commenter notes that the DEIS includes only high-level language about its Global Environmental Health and Safety (EHS) programs and commitment to worker health, but it fails to provide the operational detail needed to evaluate occupational safety. Although there are 9,000 permanent on-site operational jobs projected for the Micron campus at full buildout, but the DEIS only provides broad categorizations of these roles (e.g., manufacturing, IT, security, procurement, etc.) (pp 3-488- 3-489). There is no breakdown of tasks by job category and no risk assessments tied to specific roles or workstations. There is an absence of job-level detail.

Response: See Response to Human Health & Safety Comment 4. Breakdown of tasks by job category or other job-level detail is beyond the scope of the FEIS.

Human Health & Safety Comment 10:

Chemical-specific hazards are not identified in either the DEIS or Appendix L, by process stage, job title, or department. The DEIS relies on general references to OSHA standards and mentions that risk matrices will be developed internally (Appendix L, p. 8)—without providing examples, criteria, or reporting mechanisms. The lack of these details is especially concerning for maintenance and support personnel, and contractors, who may not work full time in hazardous areas but are often the most exposed during equipment servicing, material handling, or emergency response. A commenter also notes that people who do not routinely work in hazardous areas, unless they are adequately trained and provided with protective equipment, the more protective chemical-specific environmental standards should be applied. Without job-specific risk assessments and targeted protective measures for these roles, key exposure risks may go unrecognized and unaddressed. The DEIS fails to address how job-specific exposures will be tracked, evaluated or addressed.

Response: Micron is subject to all applicable OSHA regulations for managing workplace safety and emergency response. See FEIS Section 3.9.3.2 and Appendix L detail the robust processes that Micron will employ to ensure worker safety. See also Response to Human Health & Safety Comments 1 and 4, and Response to Solid Waste and Hazardous Materials Comment 9, regarding chemical transparency.

Human Health & Safety Comment 11:

Micron should disclose which Occupational Exposure Limits (OEL) apply for each substance. Micron pledges to apply the most protective OELs, and to revise standards within 90 days of new thresholds, but the revision time should be faster. Micron should publicly report, and regularly share with NYSDOH, summary data on its exposure sampling results and the OELs against which the exposures are being measured, worker health monitoring trends (with patient identities removed), or any corrective actions taken. The DEIS does not identify a single applicable OEL for total PFAS or for the specific PFAS that Micron plans to use. There are no Occupational Safety & Health Administration permissible exposure limits or National Institute for Occupational Safety and Health recommended exposure limits for PFAS, and the American Conference for Governmental Industrial Hygienists has established Threshold Limit Values for only three PFAS. It is unclear what limit Micron intends to apply to protect its workers from PFAS exposures.

Response: See Responses to Human Health & Safety Comments 1, 2, 6, and 19 (including discussion of OELs); Response to Solid Waste and Hazardous Materials Comment 83; and FEIS Sections 3.8.3.2 and 3.9; and Appendix L-1. Micron employs the Semiconductor Equipment and Materials International (SEMI) S2 standard, which establishes standards for design and installation of manufacturing processes to avoid or reduce workplace hazards, including for gas effluent handling, exhaust ventilation, fire risk avoidance and minimization, and electrical design and

hazards. These efforts include use of enclosed automated chemical delivery systems (which physically separate workers from the production process) to minimize potential worker safety risks and exposures. Micron would also use advanced leak detection and employ toxic gas monitoring for hazardous chemical usage. Generally, PFAS-containing compounds are a component of other chemistries used in the facility, whereby generally applicable exposure controls would also protect workers from potential PFAS exposures. More generally, Micron controls and mitigates chemical and process hazards in the workplace by employing the principles of the NIOSH Hierarchy of Controls (i.e., elimination, substitution, engineering, administrative, and personal protective equipment (PPE)), as well as USEPA's waste management hierarchy for source reduction, reuse, recycling, treatment and disposal. Micron incorporates these approaches in its evaluation and approval of chemical usage. PFAS also would be addressed cumulatively by the other regulatory controls, including appropriate storage and handling of chemicals, and spill prevention planning, as discussed in the FEIS. See also FEIS Appendix L-1.

Human Health & Safety Comment 12:

The DEIS does not include illness rate data- chronic, chemical related or otherwise. Although it discusses injury rates, it does not include information about illness rates (Appendix K, Vol. 2, p. 447). Many occupational exposures—especially to chemicals—manifest as illnesses, not acute injuries, and these should be captured and reported alongside injury statistics. The commenter requests that Micron's occupational health clinic not only provide care, but also collect and share de-identified illness data in a format compatible with public health tracking. There is a well known potential for semiconductor workers to develop occupational diseases due to long term exposure to toxic substances.

Response: The comment raises issues that are outside the scope of the FEIS. However, Micron will be required to comply with all regulatory requirements regarding the storage, use and disposal of hazardous materials. It will also be required to comply with all applicable OSHA requirements, which require third-party medical monitoring for any worker that interacts with hazardous substances.

In addition to chemical exposure limits and protection measures, Micron would implement a comprehensive industrial hygiene (IH) program to control environmental factors or stressors in the workplace that could lead to discomfort, illness, or impaired health. Micron's EHS team would be responsible for verifying the implementation and effectiveness of IH controls, such as worker health monitoring systems. As referenced in FEIS Section 3.9.1 and Appendix L-2, OSHA requires employers with more than 10 employees to maintain an injury log using Form 300 (log), Form 300A (Annual Summary), and Form 301 (Incident Report) to track worker related injuries and illnesses. Form 300A summary must be posted in a conspicuous place in the workplace. See Responses to Human Health & Safety Comments 1, 2, 4, 6, 11, 19, 23, and 27 (including discussion of OELs).

Human Health & Safety Comment 13:

The DEIS mentions that Micron will establish Worker Safety Committees (WSCs) to promote hazard identification and resolution (3-256), however, it provides no detail on how these committees will be structured to protect workers. The commenter asks if employees have the right to raise concerns anonymously, if participation will be voluntary and protected from retaliation, and if committee proceedings be recorded or summarized for public or third-party review. Internal EHS programs, however well-intentioned, can fail to catch or correct dangerous trends when there is inadequate transparency or worker empowerment. Micron should clarify how it will ensure these WSCs are effective, inclusive, and insulated from fear-based suppression.

Response: Micron will establish worker safety and health committees in accordance with ISO 45001 and 14001, which are audited by an external third party. See FEIS Section 3.9.3.2. Micron's internal Safety and Health policies also require establishment of team member lead health and safety committees that meet on a regular cadence, discuss events and concerns, and educate workers. The Micron Code of Business Conduct and Ethics identifies multiple channels for reporting ethics and compliance concerns – to include anonymous reporting of safety concerns. This is done through an anonymous hotline. WSCs are overseen by the NYSDOL Safety, Health, & Essential Rights Program, as stated in FEIS Table 3.9-1 and Section 3.9.3.2.

Human Health & Safety Comment 14:

Appendix L provides over 100 pages of detailed EHS requirements for construction contractors—including risk controls, compliance inspections, and method statements with job hazard analyses (Appendix L, pp. 10-115), but does not provide an equivalent document or plan presented for operational workers who will face daily exposure to hazardous chemicals. Many of the same standards should apply across both phases: critical risk checklists, PPE documentation, emergency response kits, pre-task planning. The DEIS mentions these elements for operations on pages 3-255 to 3-261, but does not provide access to the operational equivalent of the construction EHS performance standard. Will Micron publish these procedures? Will EHS metrics for operational staff be tracked and reported, as they are for contractors? Will there be a reward and recognition program for EHS participation by operational employees? These are basic elements of a mature safety culture—and their absence from the DEIS is concerning.

Response: Micron will establish worker safety and health programs in accordance with ISO 45001 and 14001, which include communication and/or publication of EHS procedures as well as tracking and reporting of EHS metrics. See FEIS Section 3.9.3.2. Micron's internal Safety and Health policies also require establishment of team member lead health and safety committees, risk reduction programs, PPE, emergency response and training. The Micron Code of Business Conduct and Ethics identifies multiple channels for reporting ethics and compliance concerns – to include anonymous reporting of safety concerns. Micron also has an established globally aligned internal EHS worker safety culture program called Live Safe. This program is comprised of team member engagement teams, auditing, fatality prevention programs, risk reduction programs, observational and behavioral based safety programs, among others.

Human Health & Safety Comment 15:

While Micron's ISO 45001 certification is cited repeatedly as proof of strong health and safety practices (ex: 3-256), and it is a widely respected framework, the certification standard is not publicly available, it must be purchased for \$222 USD, preventing workers, community members, and many researchers from understanding what the certification truly entails or what commitments are being made.

Response: ISO is an independent, non-governmental, international standard development organization composed of representatives from approximately 163 national standards bodies of member countries. ISO 45001, and all its publications, are protected by copyright, which are owned by ISO, and therefore cannot be reproduced or otherwise shared publicly by the lead agencies or Micron. Disseminating the certification may constitute copyright infringement.

As discussed in the FEIS, Micron would seek ISO 45001 and 14001 certification, international standards that specify requirements for an occupational health and safety management system, and an environmental management system, respectively. ISO 45001 provides a framework for organizations to manage risks and improve OH&S performance. The certification process involves implementing the management system, undergoing necessary audit and review, then receiving certification, demonstrating Micron's commitment to the underlying health and safety practices in ISO 45001.

Human Health & Safety Comment 16:

The DEIS does not respond or provides incomplete responses to NYSDEC and members of the public during as documented during the SEQRA comment period for requested chemical inventories, mitigation strategies and commitments to avoid harm.

Response: The FEIS sufficiently identifies, to the extent reasonably known, the type of materials that may be used as well as numerous avoidance, minimization, and mitigation measures that will be required of Micron and enforced by the lead agencies. The lead agencies worked closely with the NYSDEC during development of the FEIS. See NYSDEC Comment 13. They also recognize that NYSDEC is concurrently reviewing permit applications submitted by Micron for the Proposed Project.

Human Health & Safety Comment 17:

As per the 10th Amendment to the Constitution, states are responsible for the public health safety and welfare. NY will need to establish strong PFAS sharing relationships with like-minded states and countries.

Response: Comment noted.

Human Health & Safety Comment 18:

Syracuse already has the highest rate of thyroid cancer due to Allied Chemical Dumping in Onondaga Lake. People living near the Micron Plant in Manassas, VA complain of health problems. Another commenter is concerned that the economic boon of the Micron plant could again bring the bust of high health care costs for employees and community residents.

Response: Review of the Manassas, VA plant is outside the scope of this FEIS.

The FEIS acknowledges the potential for indirect and induced impacts associated with the Proposed Project. The FEIS includes an analysis of the impacts of the Proposed Project on community services and infrastructure, including health care systems. See FEIS Section 3.14.

Human Health & Safety Comment 19:

The DEIS must make clear how Micron will implement exposure limits to mitigate reproductive harm to workers. Has the government or regulators on any level given exemption from liability to Micron for damage related to the emissions? PFAS and related compounds can cause fertility and other health issues. If so, what are the details of this exemption?

Response: See Response to Human Health & Safety Comment 1, 4, 10, and 11, as well as Air Quality Comments 7, 13, and 26. Exposure limits are not necessarily the same as mitigation. Regarding a liability exemption, the lead agencies are not aware of one which would necessarily be dependent on many factors outside the scope of the FEIS.

Micron explains risk management measures and worker protection plans that will be implemented to protect exposure of workers to chemicals, including PFAS in the FEIS. See FEIS Section 3.9.3.2; Appendix L-2. Micron will comply with all applicable OSHA regulations.

Potential health effects of PFAS generally were addressed in NIST's "Final Programmatic Environmental Assessment for Modernization and Expansion of Existing Semiconductor Fabrication Facilities under the CHIPS Incentives Program" (2024), available at <https://www.nist.gov/system/files/documents/2024/06/28/Final%20PEA%20for%20Modernization%20and%20Expansion%20of%20Semiconductor%20Fabs%206-28-2024%20-%20OGC-508C.pdf>. The analyses and measures discussed in the FEIS, including new Appendix L-1 and referenced responses to comments, support the absence of significant adverse effects from PFAS due to the Proposed Project, including with respect to health and safety, and do not warrant additional measures.

Human Health & Safety Comment 20:

SEQRA mitigation measures require that Micron's Hazard Communication Program, prepared pursuant to OSHA regulations, shall include an inventory of all PFAS used at the facility and a Safety Data Sheet for each PFAS.

Response: Micron will be required to comply with all applicable OSHA requirements. See Response to Human Health & Safety Comment 1. It will also be required to have a policy to secure full chemical disclosure from all chemical suppliers, including through the use of non-disclosure agreements with these suppliers, to ensure that it has sufficient information to evaluate regulatory compliance and worker safety. See FEIS Appendix L-1.

Human Health & Safety Comment 21:

SEQRA mitigation measures require that Micron shall conduct personal breathing zone air sampling for all detectable PFAS used at the facility. The results of such sampling shall be made available to all facility workers.

Response: SEQRA mitigation measures do not require personal breathing zone sampling. Micron will be required to comply with all applicable OSHA requirements. See also Responses to Human Health & Safety Comments 1, 19, and 20 regarding Micron's worker safety plans and practices.

Human Health & Safety Comment 22:

SEQRA mitigation requires that Micron adopt an Exposure Control Plan to prevent or minimize workplace exposures to PFAS in a manner consistent with the occupational hierarchy of controls.

Response: See Responses to Human Health & Safety Comments 1, 2, 6, 11, 19, and 20.

Human Health & Safety Comment 23:

Commenters questioned whether there are cancer-causing chemicals. Micron should fund local cancer treatment centers for those who will suffer from impacts from the sludge and chemicals. Will Micron be responsible for medical bills for those impacted by hazardous materials. Micron should provide a list of potential health issues that workers or the community would be exposed to. Concerns were raised that the Project will result in increased cancer rate among the community. Human exposure to PFAs is linked to serious health outcomes. Health information from other Micron workers of Micron communities, or communities with similar facilities should be shared.

Response: The FEIS evaluates and discloses the potential environmental effects of the Proposed Project and Connected Actions, not unrelated facilities or locations. Based on the required BMPs and Micron's obligation to comply with all regulatory requirements regarding the storage, use and disposal of hazardous materials and with all applicable OSHA requirements, mitigation is not warranted. See also FEIS Appendix L-1.

Human Health & Safety Comment 24:

Commenter asked in which categories does OSHA place the chemicals used in production of chips in the required safety data sheets.

Response: In the context of OSHA, as referenced in FEIS Section 3.9, an SDS (Safety Data Sheet) is a standardized document containing detailed information about a hazardous chemical, mandated by OSHA's Hazard Communication Standard to ensure workers understand the chemical's properties, hazards, safe handling, storage, and emergency procedures. These documents must be readily accessible to employees during their work shifts and are crucial for workplace safety, compliance, and proper chemical management. Chemical manufacturers are required to complete and provide SDS to downstream customers. Chemicals provided to Micron vary and range in physical and health hazard properties.

Human Health & Safety Comment 25:

Micron should provide robust worker training and safety protocols.

Response: Micron will provide robust worker training and safety protocols. See FEIS Section 3.8.3.2, Operational Effects, Hazardous Materials. For example, the Proposed Project's RMP would incorporate: (1) a hazard assessment detailing the potential effects of any accidental chemical release that could occur at the Micron Campus, with an evaluation of worst-case and alternative accidental release scenarios; (2) a chemical accident prevention program including safety precautions, maintenance and monitoring measures, and employee training; and (3) a chemical accident emergency response program detailing the emergency response procedures Micron would provide for emergency employee care and notify relevant agencies, local first responders, and the public should an accident occur.

Copies of the RMP would be provided to local police, fire, and emergency medical response personnel, and the public to foster local community emergency response planning and public awareness. Micron would be required to update and resubmit the RMP to USEPA every five years with a history of any accidents that occurred in the five years prior and share all updates with local emergency responders. In the event of a reportable chemical accident, Micron would be required to hold a public meeting within 90 days following the accident (40 CFR § 68.210(b)). See also Response to Human Health & Safety Comment 34.

Human Health & Safety Comment 26:

The DEIS does not detail how Micron will protect worker health & safety given the intensive use of toxic chemicals. Micron must adopt detailed plans to minimize negative impacts to workers.

Response: See Responses to Human Health and Safety Comment 1, 4, 19, and 28.

Human Health & Safety Comment 27:

Micron should hire independent health and safety professionals trained in the fabrication processes to monitor the worker health and safety. The independent professional should be allowed to interact with the workers about health and safety protections.

Response: Micron intends to comply with the federal OSHA regulations that require third-party medical monitoring for any worker that interacts with hazardous substances. In addition to chemical exposure limits and protection measures, Micron would implement a comprehensive industrial hygiene (IH) program to control environmental factors or stressors in the workplace that could lead to discomfort, illness, or impaired health. Micron's EHS team would be responsible for verifying the implementation and effectiveness of IH controls, such as worker health monitoring systems. Micron would incorporate all applicable OSHA general industry standards (see FEIS Appendix L-2, Table L-1), including noise protection standards to protect employees from potential hearing damage from prolonged exposure to loud machinery and equipment in the fabs, including cleanroom environments where specialized tools and ventilation systems can generate high noise levels. Micron would install equipment noise reduction features and enclosures around loud equipment, provide hearing protection to employees, and incorporate noise safety protocols as part of workplace monitoring and training programs. FEIS Table 3.9-4 lists additional IH program measures that would be implemented at the Micron Campus.

Human Health & Safety Comment 28:

A business owner directly adjacent to the proposed facility is concerned for the health of those business employees, particularly due to potential exposures to the chemicals used at, disposed or released into the air and water by Micron. These chemicals should be carefully and thoroughly researched. There should be specific information as to how the chemicals will be treated for disposal and in a manner that is proven safe to human health. The commenter provided articles about PFAs and forever chemicals which support the concerns expressed regarding human health.

Response: See Response to Human Health & Safety Comment 27 and Response to Solid Waste and Hazardous Materials Comment 70, for discussion of disposal of waste.

See also responses to Human Health & Safety Comments 1, 2, and 6; FEIS Section 3.8.3.2; FEIS Appendix L-1. Potential health effects of PFAS generally were addressed in NIST's "Final Programmatic Environmental Assessment for Modernization and Expansion of Existing Semiconductor Fabrication Facilities under the CHIPS Incentives Program" (2024), available at <https://www.nist.gov/system/files/documents/2024/06/28/Final%20PEA%20for%20Modernization%20and%20Expansion%20of%20Semiconductor%20Fabs%206-28-2024%20-%20OGC-508C.pdf>.

Human Health & Safety Comment 29:

There must be an alert system in place in case of industrial accidents.

Response: There will be alert systems in place at the facility in case of accident per the referenced OSHA requirements in FEIS Section 3.9 and Micron's policies. See also Response to Community Facilities Comment 18.

Human Health & Safety Comment 30:

Plant workers and residents must be taught how to survive potential spills or accidents.

Response: See Responses to Human Health & Safety Comments 1, 3, and 4. See also Response to Solid Waste and Hazardous Materials Comment 48, for discussion of spill response.

Human Health & Safety Comment 31:

Public schools must be given proper equipment to protect students from potential chemical contamination from the plant.

Response: See Response to Human Health & Safety Comment 34, discussing training for local responders. See also Response to Solid Waste and Hazardous Materials Comment 48, for discussion of spill response.

Human Health & Safety Comment 32:

Healthy food should be sold at the canteen. No unhealthy foods should be sold onsite at the chip plant.

Response: Comment noted.

Human Health & Safety Comment 33:

Micron must prepare, review and update, and adhere to various plans and policies that include a Risk Management Plan or Program that includes a chemical accident prevention program with appropriate safety precautions, employee training, chemical accident emergency response program detailing emergency response procedures that Micron would provide for emergency employee care and notify relevant agencies, local first responders and the public should an accident occur.

Response: See Responses to Solid Waste and Hazardous Materials Comments 4 and 48. See also Response to Air Quality Comment 22; Response to Human Health & Safety Comment 25.

Micron would be required to update and resubmit the RMP to USEPA every five years with a history of any accidents that occurred in the five years prior and share all updates with local emergency responders. In the event of a reportable chemical accident, Micron would be required to hold a public meeting within 90 days following the accident (40 CFR § 68.210(b)).

Human Health & Safety Comment 34:

The Human Health and Safety chapter, when discussing the possibility of accidents, must clarify if this includes traffic accidents during construction of the facility.

Response: The Traffic Impact Study Section 4 (FEIS Appendix M) evaluated traffic related crashes throughout the study area. This includes by year, location, severity, contributing factors and types of collisions. Crash rates in the study area are calculated and compared to statewide averages to identify locations with above-average rates. NYSDOT and FHWA are programmed to implement several planned improvements on the roadway network within the Transportation Evaluation Area by 2027 that will assist in improving safety for motorists and construction vehicles accessing the Micron Campus, and other daily travelers through the area. These are identified in Chapter 6, Table 6-2 Planned Roadway Improvements of the Traffic Impact Study (Appendix M). Additional longer-term improvements were identified within FEIS Section 3.11 that are anticipated to be constructed by 2031, which can include locations identified with crash rates higher than the statewide average. These improvements are anticipated to provide safety benefits to these high crash locations and include re-configured interchanges (such as I-81 and NYS Route 31), providing new interchanges and roadway connections to reduce the intensity of traffic volumes at existing locations, and adding capacity to NYS Route 31, which can lower the risk of head-on and congestion-related collisions. These improvements will assist in reducing the possibility of traffic crashes during construction and operation of the Proposed Project. See also Response to Transportation Comment 16. Use of the Rail Spur Site would also substantially reduce the need for construction-related truck traffic and associated risk of accidents.

Human Health & Safety Comment 35:

Micron does not assess impacts of water pollution from their main campus potentially reaching the childcare center to be built on-site if there is a spill event. The safety of the children of their workers are at risk. Micron has refused to release the chemicals they are using, and a spill event could reach the childcare center.

Response: The Childcare Site is over one-half mile away from the Micron Campus. See FEIS Fig. 2.1-1. It is extremely unlikely that any spill event at the Micron Campus, which would be subject to Micron's joint Spill Pollution Countermeasures & Control (SPCC) Plan, BMPs, and SWPP, would affect the Childcare Site.

Human Health & Safety Comment 36:

Lighting pollution not only impacts wildlife but has also been linked to human health risks.

Response: See FEIS Section 3.13.4.2, discussing the plan for lighting at the Proposed Project.

3.10 Utilities -Energy, Water, Wastewater, Natural Gas

Utilities Comment 1:

General concerns were raised about the amount of energy the Proposed Project will consume and that there is not adequate energy supply. Page 0-11, Section 0.4: Utilities and Infrastructure, must better describe why the significant effects of the Micron facility on the electricity demand are not adverse.

Response: The lead agencies acknowledge the significant energy needs of the Proposed Project. These effects are not adverse because there is already a robust planning process that ensures adequate utility capacity to meet energy demand in New York State. That process, governed by the New York Independent System Operator (NYISO), ensures that there is adequate capacity to meet existing and projected demand so there is not a tradeoff between the Proposed Project and the demand for other users in the community. See also FEIS Section 3.10.4. Further, the Proposed Project's full energy needs will ramp up over time. This allows for the planning process to conduct the necessary system planning to ensure that the grid can meet current and future demands, including substantial new interconnections. See FEIS Section 3.10.1.

As illustrated in Figure 3.10-2 of the FEIS, the NYISO has incorporated Micron's first phase (Fabs 1-2) into its 2030 base case large load projection, identifying it as the largest anticipated new load to interconnect with the state electric grid by that date. The project will primarily draw electricity from local generation facilities in Load Zone C, including Micron's on-site renewable energy systems. See FEIS Section 3.10.3.2. As a result, the Preferred Action Alternative is expected to have a significant impact on electricity and transmission demand in Load Zone C. Specifically, it will lead to a greater and earlier exceedance of the zone's local generation capacity compared to the No Action Alternative.

Given the robustness of statewide and utility-level planning processes, it is anticipated that future electricity needs—both for the Proposed Project and broader statewide growth—will be adequately addressed. Therefore, while the Preferred Action Alternative will have significant effects on electricity demand and transmission, these effects are not expected to be adverse. See FEIS Section 3.10.3.2.

Utilities Comment 2:

Commenters expressed concern that the Project will cause utility rates to rise for consumers. Micron should fund the Town of Clay or Onondaga County energy and water to keep the community from being impacted by lack of supply or increased costs due to the Project.

Response: Although increased utility costs are a financial impact that is outside the scope of NEPA and SEQRA review, the FEIS acknowledges concerns regarding the potential impacts of Micron's energy and water use on affordability and public resources. As detailed in FEIS Section 3.15.3.2, the Connected Actions associated with the Proposed Project are not expected to result in significant adverse effects on ratepayers. Micron will be required to enter into user agreements with OCWA. Onondaga County will establish policy and guidelines for appropriate user rates for the IWWTP

to support Micron's operations in Clay. The IWWTP is not part of the OOWWTP system that provides wastewater service to residential and commercial users. These agreements will ensure that the costs associated with the project are not passed onto Onondaga County ratepayers. In addition, there are Federal and State funding sources for these infrastructure expansions that the utilities may seek to receive. Micron will also be required to pay for gas and electrical upgrades from National Grid. Any increase in rates for National Grid customers would be subject to NYSPSC approval through rate case proceedings.

Micron will directly fund gas and electrical system upgrades through National Grid. New York State law and PSC regulations establish clear safeguards to ensure that the costs associated with serving large new developments are not unfairly shifted to existing utility customers. Under these rules, utilities are required to apply provisions that obligate developers to fund infrastructure beyond standard service allowances. These measures collectively protect current customers from unanticipated rate increases resulting from new development projects. Any potential increase in customer rates resulting from these upgrades would be subject to review and approval by the New York State Public Service Commission (PSC) through formal rate case proceedings and is outside the scope of the FEIS.

Utilities Comment 3:

Commenters expressed concerns about the amount of water usage, including the availability and affordability of clean water for the community. Some commenters compared volumes of current usage, including comparison to the City of Syracuse's daily use and raised concerns that public water will be diverted in favor of the Project.

Response: The Proposed Project's anticipated water usage will not have a significant effect on water usage and capacity. See FEIS Section 3.10.

Much of the water used by Micron will be recycled. Micron will collaborate with OCWA and OCDWEP to establish sources of recycled water to support the industrial water needs of the Proposed Project and reduce overall demand on the water and wastewater systems. Micron will reuse treated industrial effluent as makeup water for the facility's cooling towers and other mechanical systems. See FEIS Section 3.10.3.2 Preferred Action Alternative.

Where recycled water is insufficient, available water supply will be sufficient to accommodate both public and project needs. As detailed in the FEIS, the necessary system modifications and upgrades (see FEIS Section 2.1.7), the required withdrawal permit modifications, and the construction of required supply infrastructure, together with OCWA's and local water management authorities' planning processes, are anticipated to collectively ensure adequate water system capacity to serve the Proposed Project and the increased customer base in 2041.

Utilities Comment 4:

What is the plan for powering the plant, and will renewable energy use be incorporated, such as solar, geothermal and wind. Commenter strongly recommended that the final EIS includes a detailed, site-specific solar energy deployment plan and urges the inclusion of binding commitments to install on-site renewable energy systems that scale with the facility's development phases.

Response: See Response to Utilities Comment 1. NYISO is responsible for managing New York's electricity supply, ensuring the grid remains reliable and stable. The state's electric grid is made up of a unique electricity supply profile that combines power from various sources. NYISO coordinates this mix to meet demand, so all electricity users—including large projects like Micron—receive power through this system. Renewable energy will be provided through grid-supplied sources and will be called upon by the NYISO using established policies and guidelines.

In the short term, the New York Power Authority (NYPA) has awarded Micron a power allocation through the ReCharge NY program to meet the Proposed Project's short-term electricity requirements. The ReCharge NY program provides qualified companies with seven-year contracts for NYPA power in exchange for certain job and economic commitments in New York State. Micron's initial ReCharge NY allocation consists of 140,000 kW (or 1,226 GWh), 50 percent of which is NYPA hydropower.

To the extent feasible, solar arrays will also be installed on rooftops on the Micron Campus. As discussed in FEIS Section 3.7.6 (Best Management Practices and Mitigation Measures, Table 3.7-14), one key strategy is to "install on-site renewable energy systems and on-site battery storage systems to supplement the Proposed Project's energy supply to the extent practicable." To support this commitment, Micron will supplement electricity demand with on-site renewable energy systems, including planned installation of approximately 4 megawatts (MW) of solar panels on the rooftops of parking garages, wastewater treatment (WWT) buildings, and BIO buildings (See Rooftop Solar Energy line item in Table 2.1-3 Micron Campus Components).

Importantly, the fab buildings, which comprise large areas on the Micron Campus, cannot accommodate solar panels due to specifications related to vibration and other operational requirements that preclude installing solar panels on the rooftops.

Micron's stated commitment of installing solar panels on the Micron Campus considers the construction spacing and sequencing, operational needs of the Micron Campus, reduction and avoidance of other environmental impacts related to placing solar panels on site, including impacts to wetlands, and the Town of Clay Zoning Code, which imposes limitations of accessory structures in front of principal buildings. Micron has also reviewed geothermal electricity generation at the WPCP and has determined that this type of generation is not feasible with current existing available technology and site suitability. Micron remains committed to reviewing technological advancements for consideration in this space as technology evolves.

Utilities Comment 5:

Concerns were raised about the unintentional water contamination. Does the massive projected outflow of Lake Ontario water to Micron violate the Great Lakes Compact? A commenter requested a review of the OCWA existing water withdrawal permit by the DEC to ensure that the spirit of the Great Lakes Compact is upheld, considering statements in the DEIS that OCWA's water capacity will be exceeded after construction of fab 2. Commenter believes every effort should be made now to predict and request permissions related to water withdrawals before the project is fully underway.

Response: Micron's water use will be governed by the Great Lakes-St. Lawrence River Basin Water Resources Compact, which New York State enforces through ECL Article 21 Title 10. This compact regulates water withdrawals from Lake Ontario and prohibits diversions outside the Great Lakes Basin, except under strict conditions. Micron's proposed water use remains within the Basin and will be subject to state-level permitting and oversight, ensuring full compliance with the Compact.

OCWA has commenced the process of amending its water withdrawal permit to ensure it complies with NYSDEC regulations, and the Great Lakes Compact. Notice of Complete Application was issued by NYSDEC on July 25, 2025, and Notice was given to the Great Lakes Compact for comment on July 29, 2025.

Concerning consumptive water use, Micron would commit to achieve up to a 75 percent water conservation rate through on-site and off-site water reclamation, recycling, and reuse. See FEIS Section 3.10.3.2 Water Usage and Capacity. In sum, Micron's operations will be subject to comprehensive federal, state, and local regulations designed to protect water resources. These regulations are intended to prevent unintentional spills, ensure that discharges remain within permitted limits, and safeguard both surface and groundwater quality.

Utilities Comment 6:

Commenters expressed concern regarding the energy usage. Other communities that have data or AI centers have raised alarms concerning the negative impacts from the facilities.

Response: See Response to Utilities Comment 1. The Proposed Project is neither a data center nor an AI center. However, as with Micron's energy needs, the NYISO interconnection and planning process will ensure that the grid can meet current and future demands across New York. See FEIS Section 3.10.3.2 Preferred Action Alternative under Electricity Consumption and Capacity.

Utilities Comment 7:

The area currently exports its electricity. The project will cause the area to be a net importer of power.

Response: The FEIS acknowledges this likelihood that Zone C is likely to become a net importer of electricity. The NYISO, the entity responsible for managing New York's electricity supply, will

ensure that the grid remains reliable and stable, notwithstanding the implementation of the Proposed Project. See Response to Utilities Comment 1

Utilities Comment 8:

Commenters expressed concern that there is not adequate energy supply, and it will impact the community. An independent, third-party professional should provide an assessment of current and potential future renewable sources of energy that are available. A report should be made to NYSERDA.

Response: See Responses to Utilities Comments 1 and 7. NYISO is an independent, third-party entity. It is not affiliated with any state or federal agency or energy company. NYISO is led by an independent Board of Directors, and its federally approved tariffs contain strict requirements preventing its Board of Directors and employees from having any financial relationship with any of the companies that participate in the wholesale energy markets.

Utilities Comment 9:

The Proposed Project will use an excessive amount of energy and as much natural gas as 107,000 typical NY households.

Response: See Responses to Utilities Comments 1, 6 and 7. The Proposed Project's electric and natural gas needs are not excessive but rather required for operations. While the project will use a significant amount of energy, this can be accommodated through the existing infrastructure and the planning process.

Concerning natural gas capacity, the Proposed Project, at full build-out in 2041, when conservatively compared to the 2024-2025 base case, would account for approximately two percent of National Grid's existing Upstate New York service area capacity and leave approximately 22 percent spare capacity on top of the demand from the Proposed Project and the existing customer base. Although the actual figure in 2041 could change based on growth in the region throughout the Proposed Project's incremental 16-year construction period, National Grid's Long-Term Plan Upstate Upgrade initiative already accounts for additional anticipated capacity needs from the Proposed Project based on National Grid's conservative future reference case for gas demand in Upstate New York. Under the Preferred Action Alternative, National Grid and Micron would engage in cooperative long-term planning to accommodate the Proposed Project's increasing gas demand and anticipated growth in Upstate New York, including in the five-county region, and including induced growth as a result of the Proposed Project. This cooperative planning would include additional natural gas delivery contracting and system infrastructure installation and upgrades to ensure that the region's natural gas needs would continue to be more than adequately met. Micron also would commit to minimizing natural gas usage at Proposed Project facilities. See FEIS Section 3.10.3.2 (Preferred Action Alternative, section on Natural Gas Consumption and Capacity).

Utilities Comment 10:

The Project should result in connection to a new sewer system for riverfront/waterfront properties along Henery Clay Boulevard.

Response: This is not a connected action as part of the Proposed Project. This will require long term community planning under a separate SEQRA process, including coordination with SOCPA, Town of Clay, OCHD, OCDWEP and NYSDEC.

Utilities Comment 11:

The DEIS does not address how the Project is in compliance with the requirements of the Great Lakes Water Quality Agreement.

Response: See Response to Utilities Comment 5. Compliance with the Great Lakes Water Quality Act (GLWQA) will be addressed in the permitting process. See FEIS Section 3.10, Utilities and Supporting Infrastructure, under the section Water Usage and Capacity.

Utilities Comment 12:

Concern was raised that the Project's electricity usage relies on the three nuclear sites that are about to be decommissioned.

Response: There are no nuclear sites about to be decommissioned in NYISO Zone C. According to the Nuclear Regulatory Commission (NRC) website (<https://www.nrc.gov/info-finder/region-state/new-york>), the three nuclear facilities located within Load Zone C, Nine Mile Point Nuclear Station Unit 1 and Unit 2 and the James A. FitzPatrick Nuclear Power Plant, are currently in operation and not are identified on the list of facilities undergoing decommissioning.

See also Response to Utilities Comment 1. NYISO is responsible for managing New York's electricity supply, ensuring the grid remains reliable and stable and dispatching electricity in accordance with its established practices. The state's electric grid is made up of a unique electricity supply profile that combines power from various sources. NYISO coordinates this mix to meet demand, so all electricity users—including large projects like Micron—receive power through this system. Micron has been awarded a power allocation through the ReCharge NY program and has sufficient power to meet the Proposed Project's short-term electricity requirements during construction and interconnection of Fabs 1 and 2. See FEIS Section 3.10.3.2. Micron is actively working with power providers to ensure adequate long-term supply.

Utilities Comment 13:

Who is covering the cost of the water pipeline from Lake Ontario for the Project?

Response: Micron will enter agreements with OCWA to ensure that the Proposed Project's utility usage is paid by Micron, not by current customers. In addition, there are Federal, State, and local

funding sources for these infrastructure expansions that the utilities may seek to receive. See DEIS Section 3.15.3.2, Connected Actions.

Utilities Comment 14:

A commenter requested a breakdown of the day-to-day electric usage of the Project, including the water treatment plant.

Response: The request is beyond the level of detail required in a FEIS. As stated in FEIS Section 3.10.3.2 (Preferred Action Alternative, Section Electricity Consumption and Capacity), the Proposed Project has been designed to minimize electricity demand to the greatest extent practicable. Utility usage will vary over the life of the Proposed Project and as additional fabs are constructed and become operational.

Utilities Comment 15:

General concerns were raised that ratepayers and tax dollars should not be used for infrastructure upgrades because Micron has the resources to address the issue.

Response: See Response to Utilities Comment 2.

Utilities Comment 16:

A commenter expressed concern over National Grid's plan to install smart metering and the potential for accidental or intentional actors turning off power and what impacts that could have on the local grid.

Response: National Grid is implementing its smart meter (Advanced Metering Infrastructure, or AMI) program throughout its Upstate New York service area to replace the Company's aged metering assets and provide greater capability and functionality for the Company and its customers. The PSC authorized National Grid to implement the AMI program in 2020, and the program is unrelated to the Micron project. Micron would not be exposed to accidental or intentional actors turning off power to the grid via the AMI solution as multiple safeguards prevent unauthorized or excessive disconnections.

In addition, only the Company's single-phase meters up to 240V (typically used for residential and smaller commercial services) support remote disconnect functionality. More information on National Grid's smart meter program, including reliability and data security, is available at this link: [Smart Meters | National Grid](#).

Utilities Comment 17:

A commenter expressed concern that National Grid is not increasing distribution capacity or generation capacity despite the amount of energy the Proposed Project will use.

Response: The Proposed Project is on the transmission system and not the distribution system. National Grid does have plans to increase the capacity of the distribution system in the area through

projects other than the expansion of Clay substation. Regarding generation, the NYISO maintains the electricity market and is responsible for resource adequacy on the transmission system. See Response to Utilities Comment 1. The Micron project will increase electric system demand and require some generation units to run more in the future than they do now. The NYISO also has acknowledged the need for additional electric generation to meet greater demand due to increasing electrification of building heat and transportation.

National Grid and NYISO are addressing regional energy needs, with the Micron project included in their planning. As shown in EIS Figure 3.10-2, NYISO's base case large load projection for 2030 includes the first phase of the Proposed Project (Fabs 1–2) as the largest of several anticipated large loads expected to interconnect with the state electric grid. The Proposed Project would primarily draw power from local generation facilities in Load Zone C.

With upgrades to grid infrastructure the responsibility of the utility provider, not the end user, National Grid has proposed several improvements to support the Project and community. As detailed in FEIS Section 3.10, these include expanding the existing Clay Substation, constructing new 345kV electric transmission lines and eight new underground duct banks to connect to the Micron Campus, expanding an existing gas regulator station (GRS), and constructing a new natural gas distribution line from the GRS to the Micron Campus. For Fab 2, National Grid is also in the preliminary phases of siting a new substation in Lysander.

Further, as noted in FEIS Section 3.7.5 Growth Inducing Effects associated with electricity, “Several grid resiliency projects are underway across New York State (see Section 3.10, Utilities and Infrastructure), including National Grid’s Upstate Upgrade (expected to be complete in 2030), which focuses on improving the integration of locally generated renewable energy like solar and wind. This project will enhance the reliability of energy delivery to the region. Similarly, Avangrid’s LineVision introduces real-time monitoring technology for transmission lines, allowing the grid to reliably carry more renewable energy. These efforts are essential for supporting State and regional energy needs, ensuring that future growth, including the induced growth from the Proposed Project, benefits from a more resilient and sustainable grid powered by increasing renewable energy generation with zero GHG emissions. As a result, the induced growth associated with the Proposed Project is not anticipated to have a significant impact on the resiliency of the electrical grid to climate change.”

Utilities Comment 18:

The cost of infrastructure upgrades and increased energy demand should not be borne by the ratepayers. The FEIS must clearly state who will pay for upgrades to infrastructure and utilities and whether the cost of utility tax abatements to Micron will be borne by ratepayers.

Response: See Response to Utilities Comment 2; FEIS Section 3.15.3.2.

New York State law and PSC regulations establish clear safeguards to ensure that the costs associated with serving large new developments are not unfairly shifted to existing utility customers. Under these rules, utilities are required to apply provisions that obligate developers to fund infrastructure beyond standard service allowances. These measures are intended to protect

current customers from unanticipated rate increases resulting from new development projects. As such, Micron is responsible for the vast majority of the capital costs for the electrical service upgrades needed for the Proposed Project. In addition to funding the capital costs associated with the service upgrades, Micron will be a ratepayer subject to National Grid's rates and will pay for the electrical services it consumes. Moreover, the PSC does not allow utilities to provide service at rates that fail to recover the utility's incremental cost of providing such service plus a reasonable contribution to utility overhead.

Utilities Comment 19:

The DEIS fails to address the importance or potential of demand flexibility in avoiding significant spikes in fossil fuel demand.

Response: See Response to Utilities Comment 1. Demand flexibility is outside the scope of the FEIS. While certain consumers can adjust their energy consumption in response to changes in the grid's supply and demand, the Micron Campus operations would need to operate 24/7.

Utilities Comment 20:

Micron is only proposing to expand transmission to the Micron facility and is not proposing to support transmission expansion in the state, which is contrary to the CLCPA.

Response: See Response to Utilities Comment 17; Response to Climate Change/GHG Comment 14. The comment suggests activities that are beyond the scope of the Proposed Project and not required by the CLCPA.

Utilities Comment 21:

The Proposed Project will cause more frequent power outages.

Response: The Proposed Project is not anticipated to cause more frequent power outages. The Proposed Project is designed such that an issue on one of the 345kV cables serving the project or on customer electrical equipment will not propagate to the rest of the transmission system. The station and cable design provides for an adequate number of circuit breakers and relays to limit any sustained impacts to the directly affected equipment. Any additional outage exposure would be *de minimis*.

NYISO coordinates the state's unique electricity supply profile that combines power from various sources to meet demand for all electricity users—including large projects like the Proposed Project.

As noted in FEIS Section 3.7.5, Growth Inducing Effects associated with electricity, “[s]everal grid resiliency projects are underway across New York State (see Section 3.10, Utilities and Infrastructure), including National Grid's Upstate Upgrade (expected to be complete in 2030), which focuses on improving the integration of locally generated renewable energy like solar and wind. These grid projects will enhance the reliability of energy delivery to the region. Similarly,

Avangrid's LineVision introduces real-time monitoring technology for transmission lines, allowing the grid to reliably carry more renewable energy. These efforts are essential for supporting state and regional energy needs, ensuring that future growth, including the induced growth from the Proposed Project, benefits from a more resilient and sustainable grid powered by increasing renewable energy generation with zero GHG emissions. As a result, the induced growth associated with the Proposed Project is not anticipated to have a significant impact on the resiliency of the electrical grid to climate change."

Utilities Comment 22:

Include information on whether Micron plans to have their own water tank/tower for fire demand and equalization of usage to minimize impacts to other water users.

Response: Micron would be required to work with the Town of Clay Town Board and the Planning Board to ensure that the Proposed Project design complies with the Town of Clay Zoning Code and all applicable building and fire codes. Code requirements include but are not limited to, proper fire engine access and maneuverability, and may incorporate any measures to address any fire access or fire-related concerns. FEIS Section 3.14.3.2, Operational Effects; see also FEIS Table 3.9-2; 19 NYCRR Part 1219 *et seq.*

Water for fire demand is provided by OCWA, which manages and plans the water supply system. Storage for fire flow and other customer demands are provided for in the water supply system. See FEIS Section 3.10.2.3 (Water Supply) ("OCWA also maintains 63 water storage facilities with a total volume of more than 170 million gallons to provide additional capacity during times of peak demand or system maintenance (OCWA, 2024b)."). As further stated in FEIS Section 4.3.10.3 (Water), "the impact analysis for water in Section 3.10 (Utilities and Supporting Infrastructure) is based on regional planning efforts that already account for past, present, and anticipated future development and growth demand, including the residential, commercial, and mixed-use developments identified in Table 4.2-1." See also Response to Utilities Comment 23.

Utilities Comment 23:

A commenter expressed concern that the region is already ill-equipped to deal with repairs needed to public utilities. During any repairs, residents may go without water and sewer as it will be diverted to keep Micron running.

Response: Utilities maintain adequate staff and have adequate resources to address maintenance and repair to their respective systems. In addition, utilities, including water supply and energy providers, are mandated by NYS to develop preparedness and response plans in the event of emergencies, which include procedures for dealing with operational outages. FEIS Section 3.10 analyzes the existing utilities infrastructure and capacities. There will be no need to divert or prioritize service to Micron and away from residents. Further, the available water supply and sanitary wastewater system capacity will be sufficient to accommodate both public and project needs, including during planned maintenance and emergency repair.

Regarding the water supply capacity, see the discussion in FEIS Section 3.10, Utilities and Supporting Infrastructure, and FEIS Section 3.10.3.2, Water Usage and Capacity. For discussion related to sanitary wastewater capacity and planning, see FEIS Section 3.10.3.2.

Utilities Comment 24:

A commenter expressed concern that the Proposed Project will result in power outages that may result in interruption to the natural gas service because some compressor stations are electric and the grid-tied solar systems without backup power will not work.

Response: See Response to Utilities Comment 1 and 21. Both NYISO and National Grid conduct reliability analyses of the transmission system in accordance with standards, rules, and requirements of the Federal Energy Regulatory Commission, North American Electric Reliability Corporation (NERC), Northeast Power Coordinating Council, Inc. (NPCC), and New York State Reliability Council, LLC (NYSRC). All NERC standards, NPCC Directories, and NYSRC Reliability Rules are available through their respective websites. National Grid also analyzes the system in accordance with its own Planning Guidelines (TGP-28), which are publicly available from National Grid's OASIS (<https://www.nationalgridus.com/Oasis/Filings-and-Studies>).

As discussed in FEIS Section 3.10.3.2, the Proposed Project was studied under NYISO's System Impact Study process, and the transmission system performed within requirements when limited transmission system upgrades were added to the models. The Proposed Project's scope provides for the customer to interconnect to National Grid's transmission substation, and given the design of the connection, reliability for customers in the area, including natural gas compressor stations, is not expected to be adversely affected by the Proposed Project.

Utilities Comment 25:

General comments were raised about the relocation of the Oak Orchard solar array.

Response: Future sites for the relocated solar panels will be determined. Although construction of the IWWTP would necessitate the removal of existing solar panel arrays located on an existing WWTP lagoon on the Oak Orchard site, OCDWEP would work with the solar company that is currently leasing the space at Oak Orchard to identify locations for potential relocation of the solar facility at other County properties. See FEIS Section 2.1.8.3.

Utilities Comment 26:

The DEIS does not make clear what operations require natural gas for the Proposed Project.

Response: The use of natural gas in operations is described in FEIS Section 3.7.3.2, Manufacturing Operations.

Utilities Comment 27:

Micron initially projected discharging 4 million gallons of wastewater per day, which was later revised to 8-20 million gallons/day. What factors contributed to this significant increase, and what further details can be provided on the anticipated volume and composition of the discharge?

Response: While the 2021 Supplemental Generic Environmental Impact Statement (SGEIS) and Findings Statement for the WPCP site provided an estimate of the sanitary wastewater discharge from potential development at the WPCP, that was a generic review of potential impacts from businesses OCIDA sought to attract to the site. Based on the specifics of the Proposed Project, OCIDA determined that a full EIS was warranted under SEQRA. As such, this is not an “increase” in wastewater discharge; rather, it is an analysis of the potential impacts to resource areas from the Proposed Project and Connected Actions. See also Response to Purpose and Need Comment 1 (discussing the need for a 4-fab facility).

With respect to the volume of wastewater discharges, as discussed in FEIS Section 3.10.3.2, Wastewater Treatment and Discharge Capacity, the Proposed Project would involve the discharge of two different types of wastewater streams: sanitary wastewater and industrial wastewater. The Proposed Project would result in the discharge of approximately 2.6 MGD of sanitary wastewater at full build-out in 2041 for treatment at the OOWWTP. Treatment of this sanitary wastewater would be within the OOWWTP’s current maximum month-rated treatment capacity of 10 MGD and within the planned Major Upgrade Project capacity of up to 25 MGD by 2041. The planned Municipal Sewer Expansion would further support the system’s sanitary sewage capacity.

FEIS Table 3.10-4 provides the estimated Proposed Project annual industrial wastewater discharge, demonstrating varying amounts of wastewater treated per day based on the Proposed Project’s buildout phasing. For discussion of the composition of wastewater and the on-site reclaim and reuse process, see Responses to Solid Waste and Hazardous Materials Comments 9 and 74, respectively.

Utilities Comment 28:

The Proposed Project would increase New York’s electricity demand by 10%. This level of demand is environmentally unsustainable, particularly in light of New York’s Climate targets under the Climate Leadership and Community Protection Act (CLCPA).

Response: While the Proposed Project is being assessed for compliance with Section 7(2) of the CLCPA by NYSDEC (see Appendix J-2), the comment raises a broader issue regarding New York’s ability to meet its GHG emission reductions as detailed in the CLCPA which is outside the scope of this project specific FEIS. See also Response to Utilities Comment 1.

Utilities Comment 29:

The DEIS does not specifically state if discharging to the Oneida River will directly impact intake for surrounding municipal water treatment facilities and who's drinking water is at risk should their treatment plan fail.

Response: See Responses to Water Resources Comments 24, 40, 47, 48 and 52.

Utilities Comment 30:

The scale of the Proposed Project would add electricity loads amounting to more than 10% of current statewide consumption. Typically, electricity demand in Zone C is the third- or fourth greatest in NYISO, but the addition of the Micron facility could elevate it to the second largest. The DEIS fundamentally misrepresents impacts on Load Zone C, and suggests that the Proposed Project can exhaust all of the net generation capacity from Load Zone C that is currently supporting electricity reliability statewide for the operations of the Micron Plant and it assumes that doing so would only impose an impact on the grid once the Micron Plant's electricity consumption exceeds net generations in the zone.

Response: See Response to Utilities Comment 1.

Utilities Comment 31:

A commenter stated that the substantial enlargement of the substation that National Grid and Micron are now planning is evidence that the existing transmission infrastructure is insufficient to accommodate the plant's loads.

Response: The planned expansion of the National Grid substation is part of the Proposed Project. It demonstrates that the established planning processes for electrical supply and transmission works and the Proposed Project's energy needs will be met on a going forward basis without significant adverse impacts.

Utilities Comment 32:

A commenter stated that the Proposed Project may result in the Syracuse area being designated as a load pocket by NYISO, and even if not, NYISO may decide to institute new capacity zones or other market mechanisms in an effort to drive investment in transmission and generation capacity into the area.

Response: See Responses to Utilities Comment 1 and 30. As discussed, NYISO is responsible for managing New York's electricity supply, ensuring the grid remains reliable and stable. The state's electric grid is made up of a unique electricity supply profile that combines power from various sources. NYISO coordinates this mix to meet demand, so all electricity users—including large projects like the Proposed Project, which already is included in National Grid's future planning efforts—receive power through this system. NYISO's future planning efforts, including new capacity zones, are governed by the NYISO and outside the scope of the FEIS.

Utilities Comment 33:

The DEIS does not include reasonably foreseeable factors that could exacerbate impacts on the grid, including unplanned retirements of existing generation sources in Zone C, such as the Nine Mile Point unit 1 (621 MW), Nine Mile Point unit 2 (1,311 MW), and James A. FitzPatrick (838 MW).

Response: See Response to Utilities Comment 12. The comment proposes circumstances that are currently speculative. FEIS Section 3.10.1 states how NYISO administers a Comprehensive System Planning Process to conduct long-term planning for additional energy generation and reliability in the State, which operates on an interconnected electricity grid, and to ensure the grid can meet current and future demands, including substantial new interconnections. NYISO is responsible for managing New York's electricity supply, ensuring the grid remains reliable and stable. The state's electric grid is made up of a unique electricity supply profile that combines power from various sources. NYISO coordinates this mix to meet demand, so all electricity users—including large projects like Micron—receive power through this system. NYISO base case large load projection for 2030 includes the first phase of the Proposed Project (Fabs 1–2). See FEIS Figure 3.10-2. The Proposed Project would primarily draw power from local generation facilities in Load Zone C because the Proposed Project is located in Load Zone C.

Further, National Grid has proposed several improvements to support the Proposed Project, including expanding the existing Clay Substation, constructing new 345kV electric transmission lines and eight new underground duct banks to connect to the Micron Campus, expanding an existing gas regulator station (GRS), and constructing a new natural gas distribution line from the GRS to the Micron Campus.

Utilities Comment 34:

If Onondaga County cannot competently build and operate a facility to process ordinary wastewater into sludge, how can we trust it to build a pretreatment facility that will eliminate PFAS and other harmful chemicals.

Response: The comment raises issues that are outside the scope of environmental review. The IWWTP will be subject to a SPDES permit issued by NYSDEC, which will monitor compliance.

Utilities Comment 35:

Lead agencies should ensure that benefits from the Proposed Project go to expansion of broadband access to underserved communities.

Response: Broadband access is the jurisdiction of the NYSPSC.

Utilities Comment 36:

The DEIS does not include enough detail on the proposed design, operation, or oversight of the temporary wastewater treatment plant.

Response: Micron will not construct a “temporary water treatment facility.” Instead, wastewater treatment will be implemented in stages, one of which is to construct pre-treatment facilities for industrial wastewater on the Micron Campus.

Utilities Comment 37:

Section 3.2.3.2 does not include two 15-million-gallon storage tanks planned at the OCWA facility.

Response: Construction of two 15-million-gallon storage tanks at the OCWA Terminal Site in Clay as part of its proposed Phase 2 improvements is addressed in FEIS Section 2.1.7.3, Table 2.1-7.

Utilities Comment 38:

The DEIS does not mention the pretreatment permit for the Micron facility (issued) by Onondaga County. It should be included in table 3.2-6.

Response: The correct table reference is Table 3.3-2 Permits and Approvals. OCDWEP will issue Micron an industrial wastewater discharge permit (IWDP) which will require Micron to meet certain discharge limits. This permitting action is covered by Table 1.4-1, Permits, Approvals, and Consultations, which states that the Proposed Project will require Micron to obtain a “[w]aste discharge permit to connect to or discharge into the County sewer system (Onondaga County Administrative Code Article XXII, Section 22, et seq.; Appendix 11-A, Sections 1153 g, j, 11.67, 11.68, 11.79).” Compliance with the IWDP effluent limits will require pretreatment by Micron at the Micron Campus prior to the permitted IWDP effluent discharge monitoring location(s).

Utilities Comment 39:

Figure 3.10-4 and the related text is unclear as to what pretreatment will occur at the facility versus what treatment will occur at the Oak Orchard facility.

Response: Figure 3.10-4 is a simplified block flow diagram, rather than a specific process flow diagram. Specific pretreatment will be defined in the permitting process. See Response to Water Resources Comment 37; see also Responses to Solid Waste and Hazardous Materials Comments 79 and 86.

Utilities Comment 40:

Micron should partner with NYPA to have it build enough publicly owned renewable energy to power their operations, and if used heat pumps and thermal energy networks to heat the building instead of gas.

Response: Micron cannot direct the development of publicly owned renewable energy (see Responses to Utilities Comments 1 and 8). FEIS Table 3.10-2 shows the Proposed Project's gradually increasing natural gas consumption per phase. Section 3.10.3.2, Natural Gas Consumption and Capacity, notes that actual consumption would likely be lower when substitutable energy sources become available to replace natural gas in operations, as Micron would commit to minimizing natural gas usage at Proposed Project facilities. See FEIS Section 3.7 (Greenhouse Gas Emissions, Climate Change, and Climate Resiliency); Table 3.10-5.

Utilities Comment 41:

A commenter expressed concern about the amount of water that the project will withdraw. Other commenters asked about the amount of water withdrawals needed and the purpose of same.

Response: See Response to Utilities Comment 3. FEIS Table 3.10-3 shows the Proposed Project's increasing freshwater usage and remaining spare capacity in the OCWA system per phase. As stated in FEIS Section 3.3.4.2, Preferred Action Alternative "Operation of the Proposed Project would rely on water supplies from OCWA, which obtains water from surface water sources." The 48 MGD that would be required for the full build-out of the Proposed Project would be sourced from Lake Ontario through the LOWTP, which currently has a practical sustained output of approximately 54 MGD, a maximum capacity of 60 MGD, and a permitted water withdrawal limit of up to 62.5 MGD. OCWA's existing infrastructure could accommodate the freshwater demand exclusively from Fabs 1 and 2 with minor upgrades. However, to accommodate the freshwater demand beyond Fabs 1 and 2 and induced growth, OCWA would need to obtain a modification to its withdrawal permit. Water withdrawals are considered as part of NYSDEC Water Withdrawal permitting and that process was initiated July 25, 2025.

The semiconductor manufacturing process requires a large quantity of fresh water, particularly ultra-pure water (UPW) for production. UPW is essential for cleaning, rinsing, and chemical dilution throughout the manufacturing process. Water is also essential for cooling sensitive manufacturing tools and supporting fab operations, including humidification, air scrubbing, and cooling towers. In addition, water is needed for general facility uses such as fire suppression, employee safety, and wastewater treatment systems.

Under the Preferred Action Alternative, Micron would commit to achieve up to a 75 percent water conservation rate through on-site and off-site water reclamation, recycling, and reuse. Micron also is working with OCDWEP to develop additional methods for off-site water reuse, including evaluating two sources of recycled water to further reduce the Proposed Project's anticipated demand for freshwater supply from OCWA (see additional details in FEIS Section 3.10.3.2, Wastewater Treatment and Discharge Capacity).

See also Response to Utilities Comment 42.

Utilities Comment 42:

A commenter stated that the DEIS does not evaluate the potential impact of higher water withdrawals from Lake Ontario or the near-shore ecosystem where water will be drawn.

Response: Potential impacts from water withdrawals will be considered as part of OCWA's NYSDEC Water Withdrawal permitting, which process was initiated on July 25, 2025. The magnitude of the proposed withdrawal increase is de minimis relative to a waterbody as large as Lake Ontario and is not anticipated to have any effect. See also Response to Utilities Comment 43.

Utilities Comment 43:

A commenter stated that the DEIS should assess general trends in water demand in the area and overall water demands on Lake Ontario in addition to project-induced growth effects.

Response: As discussed in FEIS Section 3.10.3.2, the effects of the Proposed Project on water usage and capacity must be considered in the context of OCWA's longer-term planning. Local water management authorities in the five-county region, including for example OCWA, maintain plans for future growth that incorporate and subsume projections for induced growth associated with the Proposed Project. See FEIS Section 3.10.3.2, Water Usage and Capacity. As explained in FEIS Section 3.10.3.2, Wastewater Treatment and Discharge Capacity, Lake Ontario is a massive waterbody that ensures continued availability of freshwater for withdrawal and use, almost all of which will be returned to Lake Ontario. The impact of increased withdrawal for the project and the OCWA service area as a whole (based on the REMI Study population projections) are presented and considered as part of the NYSDEC Water Withdrawal permitting process which was initiated on July 25, 2025.

Utilities Comment 44:

Commenter requested a review of the OCWA existing water withdrawal permit by the DEC to ensure that the spirit of the Great Lakes Compact is upheld, considering statements in the DEIS that OCWA's water capacity will be exceeded after construction of fab 2. Commenter believes every effort should be made now to predict and request permissions related to water withdrawals, before the project is fully underway. No mention is made in the DEIS of the loss of water to consumptive use – potentially millions of gallons.

Response: See Response to Utilities Comment 5.

Utilities Comment 45:

Concern was raised that the infrastructure expansion required to support induced growth is not discussed in the DEIS.

Response: FEIS Section 3.10.3.2 provides discussion of the effects of induced growth from the Proposed Project and expansion of utility infrastructures for the region. See also Responses to Utilities Comments 1 and 17. Anything further or more detailed would be speculative at this point.

The OOWWTP service area will require upgrades and expansion outside of the Proposed Project and therefore is not a connected action. Environmental impacts are covered under a separate SEQRA process. An analysis of potential residential and commercial growth in the Oak Orchard sewershed was performed to identify future treatment requirements to include increased capacity in addition to current planned upgrades. The OOWWTP upgrades will provide additional capacity to also accommodate the additional projected growth in the sewershed.

3.11 Transportation**Transportation Comment 1:**

A Commenter indicated that the traffic modeling lacks granularity, and failed to incorporate cumulative impacts from induced growth, school bus patterns and associated traffic, etc. Commenter also suggested that supplemental review should include multi-modal transportation impacts, identify specific upgrades required, and analyze long-term regional congestion patterns during phased build-out.

Response: FEIS Section 3.11 summarizes the findings of the Traffic Impact Study (TIS), which evaluates how transportation systems will be affected by Micron's Proposed Project. The study considers both current traffic patterns and how future growth, including the expansion of the Micron facility, will influence travel in the area. It assesses impacts on roads, transit, and related infrastructure, ensuring that recommended mitigation strategies address both immediate and long-term changes. The analysis in the TIS included a two-hour AM and two-hour PM Visum model, which utilized inputs from the Syracuse Metropolitan Transportation Councils (SMTCC) regional model. Forecasted traffic volumes take into account background growth and trips generated by the planned developments, roadway projects in the area, and anticipated traffic from the Micron site (Chapter 6 of the Traffic Impact Study in supplemental documentation, Appendix M). The outputs from the Visum model were used to perform micro level analysis using Vissim and Synchro software. The roadway network included approximately 70 intersections plus freeway segments in Cicero, Clay, Brewerton and North Syracuse. The years selected for analyses were 2027, 2031, and 2041, as these represent the periods when the combined number of construction and operations employee trips to the Micron Campus will be at their highest. During each of the analysis years, the impacted intersections and freeway segments were analyzed to determine regional congestion and the impact to the study locations.

From a multi-modal standpoint, Centro will provide transit services to the site by adjusting and creating new routes. See FEIS Section 3.11.3.6. This includes Centro's plans to evaluate the need

and provide additional transit services from downtown Syracuse to the Micron Campus, including an express bus route connecting Centro's Transit Hub to the Micron Campus, as well as extending an existing bus route to the Micron Campus along U.S. Route 11. See FEIS Section 3.1.3.6. As stated by Mr. Steven Koegel at the public hearing (VP of Business Communications with CENTRO), once operations at the site begin their intent is to provide transportation services bringing individuals to Micron and surrounding supporting businesses. In addition, FEIS Section 3.11.4.4 identifies pedestrian and bicycle improvements including the provision of shared-use paths and sidewalks along NYS Route 31 and US Route 11, connecting paths and sidewalks along existing corridors, and the provision of crosswalks and other safety improvements at intersections and interchanges.

Transportation Comment 2:

A question was raised about whether Project sponsors have coordinated regarding all the projects on Interstate Highway 81.

Response: The Proposed Project's impacts on I-81 in relation to the program of projects along the I-81 corridor have been taken into consideration in the TIS. As stated in FEIS Appendix M, traffic volumes reflect background growth and trips generated by the planned developments discussed in Section 5.2. The traffic analysis established a baseline to compare I-81 freeway operations through speed data and volumes against the Proposed Project's impact to this facility. See Appendix M Table 5.2 and Table 5-4. As summarized in Appendix M Section 6.1.2, the changes to the roadway network from the I-81 Project are included in the model to reflect changes in geometry and operations within the Transportation Evaluation Area. NYSDOT has been actively engaged in the development of this FEIS to ensure thorough coordination with the ongoing I-81 project.

Transportation Comment 3:

General comments were made that the Project will increase congestion on roadways and obstruct current traffic patterns. Concerns were raised regarding a transportation plan for workers.

Response: FEIS Section 3.11 presents a detailed analysis of traffic conditions in the No Build Alternative, where the WPCP would remain in its current condition, and the Preferred Action Alternative, with the proposed Micron Campus, but no improvements implemented to identify the significant impacts (the definition of what constitutes a significant impact can be found in Table 3.11-4 Significant Impacts Criteria). As detailed in FEIS Section 3.11, several freeway segments and intersections would be significantly impacted by the Preferred Action Alternative without mitigation. Accordingly, the FEIS recommends traffic improvements designed to mitigate the potential impacts of the Proposed Project, including those impacts cited in the comment. The report then analyzed and identified recommended mitigation scenarios that would alleviate these significant impacts. These mitigation scenarios included the widening of NYS Route 31 and a section of US Route 11, upgrades at the NYS Route 31 interchanges with NYS Route 481 and I-81, a new interchange along NYS Route 481 and a road parallel to Caughdenoy Road, a new interchange at I-81 and Sneller Road, and intersection improvements throughout the Project area such as additional turn lanes.

In addition to vehicular traffic, the FEIS identifies transit (Section 3.11.3.6) and multi-modal (Section 3.11.4.4) improvements within the study area. Centro is planning to evaluate the need and to provide additional transit services from downtown Syracuse to the Micron Campus. This includes an express bus route connecting Centro's Transit Hub to the Micron Campus as well as extending an existing bus route to Micron Campus along US Route 11. As stated by Mr. Steven Koegel at the public hearing (VP of Business Communications with CENTRO), once operations at the Micron site begin, their intent is to provide transportation services bringing individuals to Micron and surrounding businesses. Micron is also planning on operating a shuttle service for construction workers running approximately 30 shuttle trips during peak hours to reduce the amount of vehicle trips to the Micron Campus. Regarding multi-modal improvements, the FEIS identifies the provision of shared-use paths and sidewalks along NYS Route 31 and US Route 11 as well as connecting paths and sidewalks along existing corridors.

Transportation Comment 4:

The planned traffic patterns are concerning. Caughdenoy Road between Maple Road and Route 31 is not adequate to handle heavy traffic and commercial trucks- there is no shoulder, drainage ditches are only 5 ft. off the road, as there are many housing developments, it is used by people for jogging, biking, scooters. Most traffic will exit at Caughdenoy Road from Route 481. Traffic should be encouraged to use Route 31 or Henry Clay Boulevard.

Response: In addition to Caughdenoy Road, multiple routes exist for vehicles and trucks to access the site including US Route 11, the NYS Route 31 and I-81 interchange, and the NYS Route 31 and NYS Route 481 interchange to help disperse the traffic away from Caughdenoy Road. In addition, NYSDOT and FHWA plan to implement several initial traffic improvements by 2027, as detailed in Chapter 6 of the TIS (Appendix M). These measures are designed to enhance traffic flow in the area and will lay the foundation for further upgrades and mitigation strategies.

By 2031, NYSDOT is anticipating the completion of more significant improvements including a parallel road (New Access Road) to Caughdenoy Road and a new interchange at NYS Route 481 for this parallel road. This will provide a direct access between NYS Route 481 and the Micron facility, which will reduce traffic using Caughdenoy Rd. Caughdenoy Road north of NYS Route 31 is also planned to be converted to a cul-de-sac, which will make the New Access Road a more direct route from NYS Route 481 compared to using Caughdenoy Road.

Transportation Comment 5:

Several commenters concluded the DEIS adequately addressed transportation, noting funding from the Green CHIPS Community Investment Fund will improve public transit and infrastructure.

Response: Comment noted.

Transportation Comment 6:

A comment indicated that the DEIS does not address traffic congestion at East Genesee and Linden [sic (Lyndon)] Corridor.

Response: The transportation evaluation area was established in partnership with NYSDOT. The extents are defined by where the Preferred Action Alternative is expected to cause a significant impact. This approximately five-mile radius boundary was supported by detailed corridor capacity analysis and assessments, and anticipated changes in projected traffic patterns, connectivity, and land use.

Transportation Comment 7:

The FEIS should include an assessment of impacts from traffic within a 10-mile wide corridor around each new highway proposed interchange.

Response: See Response to Transportation Comment 6.

Transportation Comment 8:

The traffic analysis did not consider the traffic delays during construction of the project or construction of roadway improvements.

Response: As part of the TIS, traffic impacts for the years 2027, 2031, and 2041 were studied. This evaluation specifically focused on the busiest periods (both time of day and specific years) when both construction workforce and operational employees would be traveling to and from the Micron Campus. It covered periods when the construction and operation workforces overlap, ensuring traffic impacts for all phases were adequately considered.

For the potential roadway improvements, NYSDOT (or the responsible agency for the roadway facility) will be performing the detailed planning and design for any roadway improvements within the area. As part of these planning processes, NYSDOT (or the responsible agency) will perform needed work zone traffic analyses to determine impacts associated with construction of transportation improvements.

Transportation Comment 9:

Concerns were raised regarding increased rail traffic during construction and operations and whether it would increase wait time for drivers.

Response: According to FEIS Section 3.11.3.7, rail freight deliveries to the site are planned to occur during off-peak hours, with trains scheduled to cross NYS Route 31 twice a day (each crossing requiring approximately five to ten minutes) in order to minimize disruption and avoid significant traffic impacts at the at-grade crossings. To further reduce the potential for congestion and lengthy delays for motorists, the Project includes provisions for rail car storage areas at the Rail Spur Site.

Transportation Comment 10:

A commenter indicated that the DEIS proposes no mitigation for the increased Vehicle Miles Travelled (VMT), estimated 67 million miles annually by 2041. The proposed mitigation traffic mitigations would actually increase VMT, which would worsen other environmental harms, including traffic fatalities and surface runoff.

Response: Although the FEIS does not directly define a significant impact threshold associated with VMT on the transportation network, there are mitigation measures that are proposed that will positively impact VMT.

Centro plans to evaluate the need and provide additional transit services from downtown Syracuse to the Micron Campus, including an express bus route connecting Centro's Transit Hub to the Micron Campus, as well as extending an existing bus route to the Micron Campus along U.S. Route 11. See FEIS Section 3.1.3.6. As stated by Mr. Steven Koegel at the public hearing (VP of Business Communications with CENTRO), once operations at the site begin their intent is to provide transportation services bringing individuals to Micron and surrounding supporting businesses.

In addition, FEIS Section 3.11.4.4 identifies multi-modal improvements to offset VMT. These include the provision of shared-use paths and sidewalks along NYS Route 31 and US Route 11, connecting paths and sidewalks along existing corridors, and the provision of crosswalks and other safety improvements at intersections and interchanges. Micron is also planning on operating a shuttle service for construction workers running approximately 30 shuttle trips during peak hours to reduce the amount of vehicle trips to the site.

Transportation Comment 11:

The timing of proposed traffic improvements was questioned, noting concern that mitigation is not proposed to be implemented until 2027. Suggestions were made that widening and other measures be implemented in anticipation of construction impacts or that the project be phased in segments and at different locations to disperse traffic patterns.

Response: NYSDOT and FHWA are programmed to implement several planned improvements on the roadway network within the Transportation Evaluation Area by 2027. These are identified in Chapter 6, Table 6-2 Planned Roadway Improvements of the Traffic Impact Study (Appendix M). Additional longer-term improvements were identified within Section 3.11 that are recommended to be constructed by 2031 to mitigate significant impacts. Because the recommended mitigation measures in the FEIS fall under the jurisdiction of federal, state, and local transportation agencies, the detailed design and implementation would be subject to further review and approval by NYSDOT, FHWA, and other relevant agencies.

Transportation Comment 12:

The Draft EIS appears to have substantially underestimated the traffic caused by delivery vehicles. The commenter proposes the alternative of relying on railways for deliveries.

Response: The traffic analysis presented in the FEIS focused on the AM and PM peak periods, when the combination of construction and operational workforce-related travel to and from the Micron Campus is expected to be most significant. This evaluation included anticipated truck traffic associated with site operations during these times. It is anticipated, however, that the majority of delivery vehicle movements will occur outside of these peak hours. As such, the impacts from delivery-related truck traffic are not expected to exceed those evaluated for the primary operational workforce commuting periods. Additionally, as detailed in Section 2.1.2.1 “Micron...proposes to build the Rail Spur Site as part of the Proposed Project to facilitate a more efficient construction timeline, minimize the need to rely on transportation of construction material by truck over the Proposed Project’s 16-year construction period, and avoid or minimize the environmental effects such truck transportation would cause, particularly effects relating to increased transportation emissions, noise, and traffic congestion.”

Transportation Comment 13:

There are no proposed mitigation measures for increases in vehicle miles traveled (VMT). The proposed mitigation traffic mitigations would actually increase VMT, which would worsen other environmental harms, including traffic fatalities and surface runoff. The DEIS touches on traffic safety but avoids mentioning flooding risks from increase surface area. A better measure would be to implement a Transportation Demand Management Plan- encouraging employees and visitors to arrive by means other than driving.

Response: See Response to Transportation Comment 10.

Transportation Comment 14:

Implementation of a Transportation Demand Management Plan would fulfill the requirements identified in the NYS Green Chips and should include stakeholders such as Centro, SMTC and other planning Departments.

Response: Public transportation connectivity to the Micron Campus will be an important element of the comprehensive transportation strategy. Centro plans to evaluate the need and provide additional transit services from downtown Syracuse to the Micron Campus, including an express bus route connecting Centro's Transit Hub to the Micron Campus, as well as extending an existing bus route to the Micron Campus along U.S. Route 11. See FEIS, Section 3.1.3.6. As stated by Mr. Steven Koegel at the public hearing (VP of Business Communications with CENTRO), once operations at the site begin their intent is to provide transportation services bringing individuals to Micron and surrounding supporting businesses.

Transportation Comment 15:

The traffic improvement schedule is optimistic. The assessment should include whether there are adequate number of qualified contractors to complete the improvements

Response: As part of FEIS development, ongoing coordination has occurred with NYSDOT regarding the potential transportation improvements. NYSDOT and FHWA are programmed to implement several planned improvements on the roadway network within the Transportation Evaluation Area by 2027. These are identified in Chapter 6, Table 6-2 Planned Roadway Improvements of the Traffic Impact Study (Appendix M). Additional longer-term improvements were identified within Section 3.11 that are anticipated to be constructed by 2031 to mitigate significant impacts. Because the recommended mitigation measures in the FEIS fall under the jurisdiction of federal, state, and local transportation agencies, the detailed design and implementation would be subject to further environmental review and approval by NYSDOT, FHWA, and other relevant agencies.

Transportation Comment 16:

The proposed new interchanges on Route 81 at Sneller Road should be constructed first in order to divert traffic from the Route 31 intersections. Another commenter is concerned that the potential new interchange at Sneller Road may impact his business which is located on Route 11.

Response: The recommended traffic mitigation measures presented in the DEIS will be subject to further environmental review and approval by NYSDOT, FHWA, and local transportation agencies. As stated in the DEIS Section 3.11, the determination of which roadway improvements will be prioritized and implemented first will be guided by the agency that holds jurisdiction over the specific roadway (e.g. NYSDOT/FHWA). This sequencing will be based on their comprehensive assessment of needs, logistical and maintenance of traffic considerations, and strategic planning objectives.

Transportation Comment 17:

The FEIS must have a comprehensive analysis of Centro's current bus routes to determine transit adequacy for LMI residents. The FEIS should also include a comprehensive assessment of other future transit options.

Response: Public transit will play a key role in Micron's transportation plan. The FEIS appropriately discusses the transportation evaluation area's existing public transit system, the anticipated proposed changes in transit use and the Preferred Action Alternative recommended mitigations. Centro plans to evaluate the need and provide additional transit services from downtown Syracuse to the Micron Campus, including an express bus route connecting Centro's Transit Hub to the Micron Campus, as well as extending an existing bus route to the Micron Campus along U.S. Route 11 (FEIS Section 3.11.3.6). As stated by Mr. Steven Koegel at the public hearing (VP of Business Communications with CENTRO), once operations at the site begin, their intent is to provide transportation services bringing individuals to Micron and surrounding supporting businesses. In addition, Micron is also planning on operating a shuttle service for

construction workers running approximately 30 shuttle trips during peak hours to reduce the amount of vehicle trips to the site. The construction worker shuttle would be independent of the public transit system and operate on a fixed schedule to and from the Micron Campus from designated off-site parking lots during the peak hours. The location of this shuttle service's pick-up and drop-off is to be determined.

Transportation Comment 18:

Citing Page 3-295, the commenter encouraged utilizing bus and rail options to improve mass transit to support the Micron facility, which would help alleviate passenger vehicle traffic problems and also potentially reduce the GHG footprint for the project.

Response: See Response to Transportation Comment 17.

Transportation Comment 19:

Several commenters suggested Micron should implement incentive programs for employees to carpool or other ride sharing programs to reduce traffic impacts and the need for parking facilities. One commenter suggested Micron provide a free or subsidized shuttle service for employees to supplement mass transit options. Another commenter suggested incentivizing use of public transit through on-site parking policies.

Response: See Response to Transportation Comment 17.

Micron will encourage commuting using an EV, carpooling, or bicycle by creating reserved parking spaces for carshare vehicles and alternative-fueled vehicles, adding EV charging stations, and providing infrastructure that promotes bicycle usage (such as bicycle storage and shower rooms). Micron will also establish the Commuter Choice Program which allows employees who use mass transit to and from work to use pre-tax dollars to purchase tickets, tokens, and passes for local public transit services.

Transportation Comment 20:

Concerns were raised with respect to proposed parking facilities to accommodate workers commuting by personal vehicles, citing 12,000 spaces that would require 80-90 acres. Suggestions were made that integrating mass transit solutions could reasonably reduce the need in half, avoiding conversion of approximately 45 acres to impermeable surface.

Response: The proposed parking solution incorporates a combination of structured garages and surface lots to maximize spatial efficiency and minimize the overall footprint dedicated to parking. Additionally, the design of roadway improvements will integrate pedestrian and bicycle facilities to enhance site accessibility. Public transportation connectivity to the Micron Campus will be an important element of the comprehensive transportation strategy. Centro plans to evaluate the need and provide additional transit services from downtown Syracuse to the Micron Campus, including an express bus route connecting Centro's Transit Hub to the Micron Campus, as well as extending an existing bus route to the Micron Campus along U.S. Route 11. See FEIS Section 3.11.3.6. As

stated by Mr. Steven Koegel at the public hearing (VP of Business Communications with CENTRO), once operations at the site begin their intent is to provide transportation services bringing individuals to Micron and surrounding supporting businesses. In addition, Micron is also planning on operating a shuttle service for construction workers running approximately 30 shuttle trips during peak hours to reduce the amount of vehicle trips to the site.

Transportation Comment 21:

The DEIS indicates Micron will create four new bus stops for the Project but doesn't explain how they will be utilized.

Response: Centro plans to evaluate the need and provide additional transit services from downtown Syracuse to the Micron Campus, including an express bus route connecting Centro's Transit Hub to the Micron Campus, as well as extending an existing bus route to the Micron Campus along U.S. Route 11. See FEIS Section 3.11.3.6. As stated by Mr. Steven Koegel at the public hearing (VP of Business Communications with CENTRO), once operations at the site begin their intent is to provide transportation services bringing individuals to Micron and surrounding supporting businesses. The details of additional bus stops will be identified by Centro as part of its planning process.

Transportation Comment 22:

A commenter inquired into the viability of providing an express bus service and/or a new rail line service between the CENTRO hub in Syracuse and the Micron Clay site.

Response: See Response to Transportation Comment 17.

Transportation Comment 23:

Several commenters stated that the Draft EIS should better align with the anticipated Bus Rapid Transit (BRT) system, by proposing means of coordinating mass transit infrastructure improvements to facilitate rollout of the BRT system.

Response: See Response to Transportation Comment 17. Ongoing coordination will occur between Micron and Centro regarding transit improvements.

Transportation Comment 24:

Bicycle and pedestrian access plans could be improved in order to encourage more alternatives to accessing the facility. Consider auxiliary parking at strategic locations. See DEIS Page 3-339, Section 3.11.3.6.

Response: FEIS Section 3.11.4.4 identifies multimodal improvements. These include the provision of shared-use paths and sidewalks along NYS Route 31 and US Route 11, include connecting paths and sidewalks along existing corridors, and the provision of crosswalks and other safety improvements at intersections and interchanges. Micron is also planning on operating a shuttle

service for construction workers running approximately 30 shuttle trips during peak hours to reduce the amount of vehicle trips to the site.

Transportation Comment 25:

Micron must invest in and expand access to public transportation in the local and regional areas to accommodate the estimated population growth and Micron employees, ensuring reliable and affordable transportation.

Response: See Response to Transportation Comment 17.

Transportation Comment 26:

The FEIS should make clear how plans for various forms of transportation will support the Onondaga County Comprehensive Plan.

Response: The FEIS assesses how the regional transportation networks will be affected by the Proposed Project, identifies significant impacts, evaluates alternatives, and outlines potential mitigation measures while considering Plan Onondaga, SMTC MTP and LRTP and agency specific planning documents. See FEIS Appendix M, Section 2.1.7. The FEIS's recommended traffic mitigation measures align specifically with the Onondaga County's comprehensive plan in the planning of transit and bicycle and pedestrian facilities corridors within the impacted transportation evaluation area. These recommended mitigation measures include dedicated and continuous shared-use paths and sidewalks and the onboarding as the demand increases of transit route connectivity to the Micron Campus. See Appendix M, Section 10.6.

The design and implementation of recommended traffic mitigation measures will be collaboratively led by the responsible agencies, including, but not limited to, NYSDOT, the County, the towns, SYR Airport, and Centro, ensuring that all modes of transportation, such as transit, cycling, walking, flying and driving, are fully integrated and prioritized within the overall system.

Transportation Comment 27:

Concerns were raised regarding damage to roads and who will pay for it.

Response: Responsibility for roadways typically rests with the designated governmental authority, such as state departments of transportation, county agencies, or local municipalities, depending on jurisdiction and the classification of the road. The agencies are responsible for planning, maintaining, and upgrading public roadways to ensure safe, accessible and efficient transportation. Coordination among these agencies is essential, particularly for large-scale projects or developments that impact multiple facilities. Roadway work is typically coordinated among agencies with public input to address current and future needs. See Response to Oswego County Comment 15.

Transportation Comment 28:

Several commenters stated that the DEIS does not sufficiently address public transit investments to reduce traffic congestion and ensure job access from DACs. Eight bus routes currently operate around the evaluation area are regional rather than local, and make widely spaced, infrequent stops. If no bus routes directly connect the Project to the City of Syracuse this will create a DAC issue.

Response: Response to Transportation Comment 17.

Transportation Comment 29:

Several comments were concerned the DEIS does not incorporate the Green CHIPS CEC community priorities, or that the 2050 Long Range Transportation Plan sufficiently captures the Project's impacts such that the final EIS should acknowledge whether amendments are required.

Response: SMTC is currently in the process of creating a new 2050 Long Range Transportation Plan, which draft update was open to public comments until September 12, 2025. This draft updated document includes the Proposed Project.

In line with the goals of the Green CHIPS Act, the FEIS considers alternative transportation solutions and traffic mitigations through multi-modal improvements. Centro plans to evaluate the need and provide additional transit services from downtown Syracuse to the Micron Campus, including an express bus route connecting Centro's Transit Hub to the Micron Campus, as well as extending an existing bus route to the Micron Campus along U.S. Route 11 (FEIS Section 3.11.3.6). As stated by Mr. Steven Koegel at the public hearing (VP of Business Communications with CENTRO), once operations at the site begin their intent is to provide transportation services bringing individuals to Micron and surrounding supporting businesses. In addition, FEIS Section 3.11.4.4 identifies pedestrian and bicycle improvements including the provision of shared-use paths and sidewalks along NYS Route 31 and US Route 11, connecting paths and sidewalks along existing corridors, and the provision of crosswalks and other safety improvements at intersections and interchanges. Micron is also planning on operating a shuttle service for construction workers running approximately 30 shuttle trips during peak hours to reduce the amount of vehicle trips to the site.

Transportation Comment 30:

A commenter suggested building a new exit on Interstate 81 in Cicero and a complete redesign of the I-81/Route 31 intersection by 2031.

Response: See Response to Transportation Comment 16. Recommended proposed transportation improvement projects include an upgraded and reconfigured interchange at I-81 and NYS Route 31 as well as a new interchange at I-81 and Sneller Road. The I-81/ Sneller Rd interchange is anticipated to be completed by 2029 and the I-81/NYS Route 31 interchange by 2031.

Transportation Comment 31:

A commenter suggested denying local and state land use approvals until there is an enforceable transportation improvement agreement in place.

Response: NYSDOT (or the responsible agency for the roadway facility) will be performing the detailed planning and design for any roadway improvements within the area. NYSDOT and FHWA are programmed to implement several planned improvements on the roadway network within the Transportation Evaluation Area by 2027. These are identified in Chapter 6, Table 6-2 Planned Roadway Improvements of the Traffic Impact Study (Appendix M). Additional longer-term improvements were identified within FEIS Section 3.11 that are anticipated to be constructed by 2031 to mitigate significant impacts.

Transportation Comment 32:

Commenters in support acknowledged the Draft EIS's detailed plans to reduce traffic impacts.

Response: Comment noted.

Transportation Comment 33:

The DEIS does not consider the impact on commercial and private air traffic volumes based on project-related travel and the air travel commercial and private air traffic volumes based on project-related travel and the air travel needs of the thousands of added Central New York families employed directly and indirectly in connection with the Project.

Response: FEIS Section 3.11.3.8 includes an analysis of airport travel. The level of analysis for project-related air travel is commensurate with the expected effects, which are considered de minimis compared to those associated with vehicular traffic. Therefore, a more detailed quantitative analysis was not included, as it would not alter the conclusions of the FEIS regarding transportation-related impacts. Further, considerations related to commercial air traffic at Syracuse Hancock International Airport are being integrated into the ongoing update of the Airport's Master Plan. The Airport is currently executing a five-year improvement plan designed to address near-term operational needs (refer to FEIS Section 3.11.3.8).

Transportation Comment 34:

The third bullet on DEIS page 3-297 should add increased risk of chemical spills from trucks delivering and transporting wastes, particularly during years when Fabs 1 and 2 are operational but Fabs 3 and 4 are under construction.

Response: The bullet point list on Page 3-297 identifies high crash locations within the study area (i.e. locations exhibiting crash rates higher than the statewide average for similar types of facilities). The goal of the third bullet point is to identify the number of high crash intersection locations. See also Response to Solid Waste and Hazardous Materials Comment 41.

Transportation Comment 35:

The traffic analysis does not incorporate cumulative impacts from induced growth, school bus patterns, and concurrent construction traffic.

Response: See Response to Transportation Comment 1.

3.12 Noise & Vibration**Noise Comment 1:**

General comments were made that the Project will cause noise and vibrations that will disrupt the local community. Micron should prioritize effective noise mitigation measures protecting all residents and ensuring quality of life is not compromised, especially those in close proximity to the project and its transportation corridors.

Response: FEIS Section 3.12 presents a comprehensive analysis of noise and vibration impacts associated with all phases of the Proposed Project, including construction and operations. Section 3.12.5.3 summarizes the anticipated noise impacts, while Section 3.12.6 outlines the proposed mitigation measures. The analysis concludes that no significant vibration impacts are expected over the life of the Project, however, there will be significant adverse noise effects. As discussed in FEIS Section 3.12.5.3, construction and operations only accounts for a small percentage of significant adverse effects. Transportation-related noise is the most significant generator of noise, because it is the closest noise source to most of the receptors.

To protect residents and maintain quality of life, particularly for those living near the Micron Campus, Rail Spur Site, and transportation corridors—the FEIS proposes a combination of operational BMPs and both permanent and temporary sound barriers to reduce noise levels. These measures are designed to minimize disruption and ensure compliance with applicable noise standards.

Regarding transportation-related noise, Section 3.12.6 notes that most impacted locations have driveway access to adjacent roads, which limits the feasibility of installing effective noise barriers. However, one area along Route 31 has been identified where noise abatement is feasible and will be pursued. Additionally, as stated in FEIS Section 3.11.5, further traffic noise impact analysis along state-owned roadways will be conducted by FHWA and NYSDOT as part of a separate environmental review. See FEIS Section 3.11.5.

Throughout the development process, Micron will continue to implement effective noise mitigation strategies and continuing coordination with regulatory agencies to ensure that community concerns are addressed and that residents are protected.

Noise Comment 2:

The noise effects from construction, operation and traffic are uncertain or unpredictable as the information is based on modeled data.

Response: Modeling is an industry- and agency-accepted method of determining potential noise impacts as it has been found to be a reliable (and often the only feasible) method of predicting future sound conditions in complicated sound environments. FEIS Section 3.12 presents the results of a comprehensive, robust, and conservative model completed using industry standard modeling software, the details of which are presented in Appendix N.

Noise Comment 3:

A commenter stated that the DEIS does not consider the impacts of project-related noise, particularly on-going traffic noise, on wildlife.

Response: The comment is incorrect. FEIS Section 3.4.4.2 acknowledges that project-related activities, including noise, may result in potentially significant adverse impacts to wildlife. This includes consideration of how ongoing noises, such as that associated with traffic, could affect habitat use, behavior, and species presence.

To address these concerns, FEIS Section 3.4.5 outlines a range of BMPs and mitigation measures aimed at reducing and offsetting impacts to wildlife. These include noise reduction strategies identified in Table 3.4-12, which are designed to minimize disturbance during sensitive periods such as breeding and migration.

Because transportation-related noise is primarily concentrated along major corridors, its impact on wildlife is expected to be limited in scope and localized. Nonetheless, the FEIS incorporates these considerations into its broader ecological impact analysis to ensure that wildlife protection remains a priority throughout project planning and implementation.

Noise Comment 4:

Concern was raised that the wooded buffer zone between the Oak Orchard plant will not actually protect the surrounding homes from impacts.

Response: The Oak Orchard site planning is considering spatial separation to locate the new Oak Orchard IWWTP facilities at the maximum allowable distance from existing residential homes leaving wooded areas in place to the extent possible. In addition, the Oak Orchard facility is considering physical barriers to minimize impacts to the public.

Noise Comment 5:

A commenter stated that Micron should build sound barriers for residential communities surrounding NYS Route 31, Caughdenoy Road, NYS Route 481 and U.S. Route 11.

Response: See Responses to Clay Comments 7 and 10.

Noise Comment 6:

Page 3-397: In the first bullet mentions that less audible backup alarms, such as quackers and strobes (nighttime only) will be considered as well. Backup alarms are notorious for resulting in complaints, even if average noise levels are acceptable.

Response: The referenced text included in FEIS Section 3.12.6, BMPs and Mitigation Measures, reflects Micron's commitment to require the use of less intrusive backup alarm technologies to minimize and eliminate potential impacts associated with backup alarms.

Noise Comment 7:

Page 3-399: In the final paragraph it would help to estimate the fraction of EVs expected, which would tend to reduce the vehicle noise and GHG emissions.

Response: While increases in EV adoption may have the potential to reduce transportation noise impacts in some cases, fuels used by public and private vehicles operating on public roadways are not under the purview of the applicant, not reasonably foreseeable and cannot be predicted with any level of certainty. Applicable noise impact mitigation measures can be found in FEIS Section 3.12.6.

Noise Comment 8:

A Community Oversight Committee should review noise effects from construction and operations.

Response: Noise effects from construction and operations of the Proposed Project are reviewed in the FEIS in Section 3.12, providing a list of BMPs and mitigation measures to avoid and minimize potential noise effects during construction and operation. See FEIS Section 3.12.6. Construction and operation of the Proposed Project will be subject to the noise requirements in the Town Codes of Clay and Cicero; no further oversight is necessary to ensure compliance. See FEIS Section 3.12.2.

Noise Comment 9:

Page 3-361: In the first full paragraph describe how noise and dust during the construction of traffic improvements (between 2027 and 2031) is addressed.

Response: As stated in FEIS Section 3.11 Transportation and Traffic, the recommended mitigation measures are provided for consideration by the local, state, and federal traffic agencies with jurisdiction over the identified roadways. NYSDOT and FHWA will undertake a separate NEPA/SEQRA environmental review of the recommended mitigations and implement these or other mitigations that the agencies deem appropriate to ensure the best overall operational performance of the transportation network with the Proposed Project. Therefore, construction-related noise and dust associated with construction of the recommended traffic improvements as put forward as potential mitigation measures will be analyzed and addressed in their environmental review.

3.13 Visual Impacts & Community Character

Visual/CC Comment 1:

The DEIS provides little detail about the physical layout or visual impact of the plant itself and Micron should release detailed publicly accessible building plans before approvals are issued.

Response: The FEIS provides visual renderings, along with details of the Micron Campus site Plan (see Figure 2.1-4 and Figure 2.1-5), which includes fab building structures together with all support facility locations and structures. FEIS Section 3.13.4.2 provides further detailed descriptions, including dimensions of the campus structures and support facilities.

As described in FEIS Section 3.13.1 and Appendix O-1, a total of 76 viewpoints of the Proposed Project and Connected Actions were initially identified within the visual effects study area, inclusive of viewpoints from designated aesthetic resources in the study area. As described in FEIS Section 3.13.3 and Appendix O, potential lines of sight to the Micron Campus structures were reviewed, based on photos taken at the 76 viewpoints, and a representative sample of 15 viewpoints of the Micron Campus were selected to prepare photo simulations of how the relevant structures would appear from the viewpoints (Figure 3.13-6 through Figure 3.13-20). The Proposed Project will also be undergoing site plan approval where details of project site designs will be reviewed by the Town of Clay and all relevant agencies.

Visual/CC Comment 2:

Micron should significantly expand the wooded buffer and include targeted mitigation measures such as berming and screening.

Response: As described in FEIS Section 3.13.5, the Micron Campus and the Rail Spur Site would include various setbacks, perimeter vegetation screening, on-site vegetative screening, and downward directional, shielded, warm lighting where feasible to help reduce overall visual effects on the surrounding area. The Childcare Site and the Connected Actions are not anticipated to result in highly noticeable visual effects on surrounding areas once completed. As a result, the Preferred Action Alternative would not result in any significant aesthetic impacts on designated aesthetic resources; therefore, no mitigation for those resources is required.

Visual/CC Comment 3:

Concerns were expressed that Micron's development could hinder religious congregations from continuing community services and support programs.

Response: Construction and operation of the Proposed Project are not anticipated to hinder any religious congregations from continuing community services and support programs.

With respect to potential noise impacts on religious congregations, FEIS Section 3.12 presents a detailed comprehensive analysis of combined noise and vibration impacts from all project activities, including from increased traffic, throughout the life of the project. Modeled receiver

location R16 was located near the Lutheran Church (see Figure 3.12-6). FEIS Table 3.12-6, Table 3.12-8, Table 3.12-11, and Table 3.12-14 show the noise metrics associated with R16 and establish that R16 is not predicted to experience a significant noise impact from Micron Campus or Rail Spur Site construction alone. As shown in Table 3.12-8, R16 is not predicted to experience a significant noise impact from Micron Campus operation alone. The combined Micron Campus and Rail Spur Site construction, operation, and traffic noise of the Preferred Action Alternative is predicted to have a noise impact varied dependent on time of day and the Proposed Project's development year. However, with the driveway/parking lot access to NYS 31, noise barrier mitigation is not feasible as stated in FEIS Section 3.12.6. See also Response to Noise Comment 1.

In regard to vibration, truck traffic is not known to cause noticeable vibrations. See FEIS Section 3.12.4. All studies to assess the impact of traffic-induced vibrations have shown that both measured and predicted vibration levels are less than any known criteria for structural damage to buildings. Regarding human annoyance, normal living activities within a building (e.g., closing doors, walking across floors, operating appliances) have been shown to create greater levels of vibration than highway traffic (FHWA, 2011, Appendix G "Highway Traffic-Induced Vibration").

Regarding potential traffic impacts, FEIS Section 3.11 presents a detailed analysis of anticipated traffic impacts from the construction and operation of the Proposed Project and provides a list of BMPs and mitigation measures to avoid or minimize anticipated impacts. The recommended mitigation measures are provided for consideration by the local, state, and federal traffic agencies with jurisdiction over the identified roadways.

The suite of traffic mitigation measures presented in the FEIS will be subject to further environmental review and approval by NYSDOT, FHWA, and local transportation agencies. Specifically, NYSDOT and FHWA will undertake a separate NEPA/SEQRA environmental review of the recommended mitigations and implement these or other mitigations that the agencies deem appropriate to ensure the best overall operational performance of the transportation network.

Finally, as noted in FEIS Section 3.13, the Proposed Project would not directly affect community cohesion, as it would not physically separate surrounding communities from vital facilities and resources. See FEIS Section 3.13.4.2.

3.14 Community Facilities, Open Space & Recreation

Community Facilities Comment 1:

Concerns were raised about whether emergency services, including fire and police, can accommodate the Proposed Project's needs during construction and operation. The Proposed Project will create an additional burden on emergency resources. A commenter raised concerns about the ability of local emergency services to have the funding necessary to adequately respond to emergencies at the Proposed Project, including whether local emergency services have the required resources (e.g., number of employees), training and emergency plans in place. Commenters are concerned that the massive scale of the project will strain emergency services. Details are lacking on impacts on services like how emergency response will be managed, particularly during a potential

chemical incident. The public deserves to see the full plan to address these circumstances. Others similarly commented that the DEIS contains no information on whether volunteer fire departments have had the full training in hazmat that should be available on a 24/7 basis. Hazmat training is very difficult to accomplish with volunteer departments, particularly during normal business hours when many of the volunteers are at their paid jobs.

Response: The Proposed Project's potential impacts to local emergency services, including fire and police, from the construction and operation of the Proposed Project are addressed in FEIS Section 3.14. Although construction and operation of the Proposed Project will not create an undue burden on local emergency services, including fire, police, emergency medical services (EMS), induced growth would likely significantly impact fire services. Mitigation measures for fire services are detailed in Section 3.14.4, BMPs and Mitigation Measures.

Requests for police assistance are not expected to substantially increase during construction or operation of the Proposed Project. Micron would contract with private security services during construction, and throughout ongoing construction as fab operations come online and become operational. Permanent on-site security personnel would be employed and can respond to minor incidents. For other incidents, Micron's security team can engage police assistance from the Onondaga County Sheriff's Office or the New York State Police. The Cicero Police Department would only respond to incidents within the Town of Cicero. As most of the Micron Campus would be within the Town of Clay, it is expected that calls to the Cicero Police Department would be minimal. Overall, the limited number of potential police service calls would not warrant an increase in patrols or a need to hire additional officers. Accordingly, local police services would be anticipated to have adequate capacity to address any incidents that arise in connection with Proposed Project operations.

The number of fire and EMS incidents can be anticipated based upon incidents recorded at Micron's Boise operations, which are depicted on FEIS Table 3.14-5. In order to avoid burdens on local emergency services for medical and fire incidents during construction and operation, Micron would continuously employ its EHS personnel, along with its highly-trained Emergency Response Team (ERT), acting as an initial line of response and thereby limiting emergency calls and burdens on community first-responders. A complete summary of the ERT roles and responsibilities is found in FEIS Appendix L-3. The ERT members are trained in OSHA communication and emergency response standards (HAZWOPER), as well as State and National Emergency Medical Technician standards (EMT-B). The ERT team is overseen by a physician trained in US Department of Homeland Security incident management standards. In addition to these measures, and maintaining construction safety best management practices, Micron plans to construct and operate an on-site occupational health clinic staffed with an occupational medical physician, as well as physician's assistant, registered nurse, licensed nurse practitioner, physical therapist, and other support staff. The ERT would transport injured workers or personnel to the on-site health clinic for medical care, as appropriate, and would assist in transporting personnel in instances requiring urgent or hospital care.

As more fully discussed in the FEIS, in advance of construction and operations, Micron intends to coordinate closely with Town of Clay fire departments, Syracuse Fire Departments, and all other necessary fire departments or agencies in order to establish necessary joint protocols for responses

to fires and incidents involving hazardous materials. As discussed in the FEIS, Syracuse Fire has a trained hazmat response team that can respond to incidents on the Micron Campus. See FEIS Section 3.9.3.2, Operational Effects. See also Response to Clay Comment 17; Response to Solid Waste and Hazardous Materials Comment 48.

Community Facilities Comment 2:

Concerns were raised about whether emergency services, including fire and police, can accommodate the induced growth due to the Proposed Project.

Response: The reasonably foreseeable impacts to local emergency services, including fire and police, from induced growth from the Proposed Project, as well as mitigation measures, are addressed in FEIS Section 3.14. The FEIS acknowledges that induced growth associated with the Preferred Action Alternative would result in a potentially significant increase in demand for volunteer firefighting services. It is anticipated that over time, local and regional fire departments will likely need to increase service capacity to accommodate induced growth. Any increases to service capacity associated with induced growth in any of the five counties is anticipated to be funded via taxes and revenues associated with the induced growth itself. As the population and tax base grows, local governments and service providers have the capacity to allocate additional resources to public services, such as the police, to keep pace with demand. Additionally, induced growth will occur gradually over time as construction starts and elements of the Proposed Project become operational, allowing local emergency services to expand over time to meet potential demand.

To address the potentially significant adverse effect on volunteer fire services as a result of induced growth associated with the Proposed Project, including on the Clay Fire's response capacity, Micron would commit to pay for and support ongoing training efforts with Clay Fire and other local fire departments. Similarly, Micron would work with Clay Fire to determine any future need for the development of a full-time professional fire service. The determination of future needs planning could be completed through a feasibility study or similar alternative method.

Induced growth would potentially require some police services in the five-county region to expand their capacity over time and shift services and patrols due to changes in population patterns. In general, because emergency services are funded by taxes, the increased tax base associated with induced population growth would likely help to fund the needs of those services to expand over time to keep pace with that growth. The New York State Police, the Onondaga County Sheriff's Office, and the Cicero Police Department indicated that they do not anticipate the gradual build-out of the Proposed Project to hinder their service capacities. EMS in the five-county region are private businesses with paid employees that are coordinated through 911 centers and bill per call. These businesses are expected to expand and hire additional employees as needed as revenues increase from increased calls.

Community Facilities Comment 3:

The commenter encourages Micron to include more specific details regarding the Syracuse Fire Department and other nearby fire stations in case of an emergency.

Response: See Response to Community Facilities Comment 1. As more fully discussed in the FEIS Section 3.9, in advance of construction and operations, Micron will coordinate closely with Town of Clay fire departments, Syracuse fire departments, and other necessary fire departments or agencies in order to establish necessary joint protocols for responses to fires and incidents involving hazardous materials.

Community Facilities Comment 4:

The EIS should fully disclose all municipal costs to be incurred for expanded municipal services including police and fire which are necessary for the project. It should assess whether PILOT payments will be sufficient to meet community needs and mitigation costs for these services.

Response: An assessment of community facilities and the impacts associated with the Proposed Project is provided in FEIS Section 3.14. Any increases to service capacity associated with induced growth in any of the five counties is anticipated to be funded via taxes and revenues associated with the induced growth itself. Because these effects are not anticipated to be significant, no further analysis is required. It is generally understood that as population and tax base grow, local governments and service providers would have the capacity to allocate additional resources to public services, such as the police, to keep pace with demand. Accordingly, no additional data is required.

Where potential adverse impacts are anticipated, Section 3.14.4 provides best management practices and proposed mitigation. See also Response to Community Facilities Comment 2; Responses to Socioeconomic Conditions Comments 4 and 12.

Community Facilities Comment 5:

The DEIS states that the proposed site will be served by the Onondaga Sheriff's Office and the Clay, and possibly, the Cicero Volunteer Fire Departments. The DEIS does not mention that any of these agencies were contacted to inquire and determine their capacity to respond to a wide variety of potential problems that could occur during construction and/or operations. The commenter questions the capacity of these agencies to respond in a timely manner to unique events that would not necessarily happen at other facilities in their service areas. A commenter indicates that it is curious that the Town of Clay was the only local government contacted, but that repeated phone calls and messages were not replied to. Another noted that the DEIS fails to indicate whether municipalities were consulted before making conclusions about community services. Were other governments contacted to inquire about impacts to professional capacity? Any correspondence with municipalities substantiating claims should be part of the Appendix.

Response: Micron consulted directly with and continues to consult with the fire and police services that serve the area impacted by the Proposed Project and that would be expected to respond to incidents at the Micron Campus. The entities contacted include the Town of Clay Volunteer Fire Department (Clay Fire), the Town of Cicero Volunteer Fire Department (Cicero Fire), the Syracuse Fire Department, the Town of Cicero Police Department, the Onondaga County Sheriff's Office, and the New York State Police. Micron also consulted with the local EMS services, including the North Area Volunteer Ambulance Corps (NAVAC) and the Northern Onondaga Volunteer Ambulance (NOVA). Through this outreach, the fire, police, and EMS services provided information and feedback to Micron, including any potential concerns with responding to incidents at the proposed manufacturing facility during construction and operation, as well as potential capacity issues associated with induced population growth. This information is reflected in the assessment provided in FEIS Section 3.14. See also Responses to Community Facilities Comments 1 and 2.

Community Facilities Comment 6:

The DEIS contains no information regarding locations of substations of the Sheriff's office, or if one will be built and what organization will pay for it and when.

Response: FEIS Figure 3.14-1 and Table 3.14-1 identify the location of the Sheriff's Office North Community Police Station. As indicated in FEIS Section 3.14, local police services are anticipated to have adequate capacity to address incidents during construction and operation of the Proposed Project. Induced growth would potentially require some police services in the five-county region to expand their capacity over time and shift services and patrols due to changes in population patterns. In general, because police services are funded by taxes, the increased tax base associated with induced population growth is anticipated to fund the needs of police services to expand over time to keep pace with that growth. The New York State Police, the Onondaga County Sheriff's Office, and the Cicero Police Department indicated that they do not anticipate the gradual build-out of the Proposed Project to hinder their service capacities.

Community Facilities Comment 7:

A commenter questioned how the federal official Incident Command System (ICS) will be implemented if any event occurs. The New York State Police are nearby. How will quick decisions be made in this regard? Will there be debating response agencies (state and local governments)?

Response: Agencies responding to any incidents during construction or operations of the Proposed Project will respond according to their own established response protocols. Micron also has an established Incident Command System. Micron maintains internal globally-established emergency response procedures and protocols, which would be utilized at the Proposed Project. This includes, but is not limited to, Global Emergency Response Standard, Global Emergency Response Team Review, Global Automated External Defibrillation Standard, Global. Global Bloodborne Pathogen Standard. The Global Emergency Response Standard outlines the requirements of the Micron Emergency Response Program, including incident command. This program also includes roles and responsibility determination for the Micron personnel responsible for implementation of incident command, including those responsibilities of the Micron Incident Commander. Micron would

utilize local resources such as New York State Police, as needed, or requested based on event type. In addition, Micron will continue partnering with local and state responding agencies.

Community Facilities Comment 8:

A large influx of additional people to the area could exacerbate the need for public safety, medical and/or fire response.

Response: See Responses to Community Facilities Comment 1 and 2.

Community Facilities Comment 9:

The potential significant effect on volunteer fire services due to induced growth is acknowledged, with Micron committing to support training efforts with Clay fire and other departments. These commitments need to translate into equitable and robust support for all emergency services serving the expanded population so that public safety is not compromised in any community, including low-income or minority communities.

Response: See Response to Community Facilities Comment 1 and 2. To address the reasonably foreseeable significant adverse effect on volunteer fire services as a result of induced growth associated with the Proposed Project, including on Clay Fire and the Town of Clay's fire response capacity, Micron would commit to pay for and support ongoing training efforts with Clay Fire and other local fire departments. Similarly, Micron would work with Clay Fire to determine any future need for the development of a full-time professional fire service. The determination of future needs planning could be completed through a feasibility study or similar alternative method. However, as stated in FEIS Section 3.16.3.2, "[o]verall, significant adverse impacts to police, fire, EMS, and healthcare facilities are not anticipated, and the Proposed Project is not expected to cause or increase a disproportionate pollution burden on DACs or minority or low-income communities related to the availability of police, fire or healthcare facilities services."

Community Facilities Comment 10:

The DEIS does not evaluate the project's effects upon fire and EMS operations on surrounding communities. Maintaining access during construction will require municipal oversight and require technical capacity beyond municipal staffing levels. Mitigations may include signal coordination of adaptive signaling, and emergency preemption at traffic signals.

Response: FEIS Section 3.14 contains a thorough discussion of the potential impacts of the Proposed Project on police, fire, and EMS operations. This includes BMPs and mitigation measures where necessary to address impacts to fire services from induced growth. See FEIS Section 3.14.4; Table 3.14-8. Measures, such as signal coordination, or emergency pre-emption at traffic signals fall under the jurisdiction of federal, state, and local transportation agencies, and the detailed design and implementation of those measures would be subject to further review and approval by those agencies, who may evaluate additional measures such as optimizing signal coordination and adjusting traffic signal timing to further enhance overall traffic movement. See also Responses to Community Facilities Comments 1 and 2.

Community Facilities Comment 11:

The scale of the construction activity and operational footprint will create sustained demand impacting public safety readiness and municipal capacities in areas of engineering, planning, code enforcement, stormwater management, and snow removal.

Response: The FEIS addresses issues of public safety (see FEIS Section 3.14 Community Facilities, Open Space, and Recreation) and stormwater management (see FEIS Section 3.3.4.2).

The FEIS acknowledges that induced growth may increase demand for local emergency services. See FEIS Section 3.14.3.2 (Growth Inducing Effects). Funding for emergency service staffing, training, and equipment is provided through municipal budgets, which are supported by the local tax base. The Proposed Project is expected to substantially expand the tax base in Onondaga County and surrounding municipalities, thereby providing additional resources to support emergency services and municipal services. Municipalities will direct necessary investments to support such services.

Community Facilities Comment 12:

Clarification is requested if Micron will maintain on-call contracts with appropriately trained and equipped private emergency response and cleanup contractors that would be prepared to mobilize and address any spills or releases on an emergency basis.

Response: See Response to Solid Waste and Hazardous Materials Comment 57.

Community Facilities Comment 13:

The appropriate plans and policies meeting State and Federal Requirements will need to be adhered to. Micron must prepare, review and update, and adhere to plans and policies that include a Risk Management Plan or Program that will apply to listed Regulated Substances identified by the USEPA under section 112 of the Clean Air Act and that will include a hazard assessment that anticipates the potential effects of any accidental chemical release that could occur at the Micron Campus, with an evaluation of worst-case and alternative accidental release scenarios; a chemical accident prevention program including safety precautions, maintenance and monitoring measures, and employee training; and a chemical accident emergency response program detailing the emergency response procedures Micron would provide for emergency employee care and notify relevant agencies, local first responders, and the public should an accident occur.

Response: See Responses to Solid Waste and Hazardous Materials Comments 4 and 48, and Responses to Community Facilities Comments 1 and 2.

Community Facilities Comment 14:

Federal- and state-mandated Spill Prevention, Containment, and Countermeasure (SPCC) Plans, Spill Prevention Reports (SPR), and Risk Management Plans (RMP) will govern Micron's on-site operations, but spills or releases during transport to and from the facility may occur on local roadways and in nearby neighborhoods. Effective

response to such incidents will require volunteer fire departments and other first responders to receive specialized training in the specific hazards posed by these materials and they must also be equipped with the necessary protective gear, containment tools, and monitoring equipment.

Response: See Responses to Community Facilities Comments 1, 2, 12, and 19, and Response to Solid Waste and Hazardous Materials Comment 48. See also Response to Air Quality Comment 22.

As discussed in FEIS Section 3.9, Micron would implement its internal set of policies, procedures and resources to govern emergency management (or ERMS) and deploy its Emergency Response Team (ERT) beginning with construction. The ERMS and ERT also would be in place and govern emergency response throughout continuous Proposed Project operations. As part of the ERMS, Micron management and the ERT would conduct regular emergency drills and would implement site-specific emergency response protocols in coordination with local first responders, including specialized emergency response measures developed in collaboration with the Clay Fire Department, and would establish an emergency response support agreement with the Syracuse Fire Department. Micron also would be responsible for implementing its RMP, Process Safety Plan, and other measures consistent with USEPA regulations. Micron would ensure its emergency response protocols align with facility hazard monitoring systems, including leak detection and automatic shutdown systems and emergency evacuation alarms. Micron will assess all resources needed for responders which includes protective gear, tools and related equipment prior to commencement of construction.

Community Facilities Comment 15:

Micron, Onondaga County, New York State, and OCIDA must provide funding and technical support to train, equip, and maintain the readiness of the Town's volunteer fire departments, police, and code enforcement staff. The scale of the project poses unacceptable risks to community health, safety, and quality of life.

Response: See Responses to Community Facilities Comments 1 and 2. As described in FEIS Section 3.14, the Proposed Project would be required to comply with all applicable laws and regulations. This, coupled with the avoidance, minimization and, where appropriate, mitigation measures, establish that the Proposed Project does not pose an unacceptable risk to community health, safety or quality of life.

Funding for emergency service staffing, training, and equipment is provided through municipal budgets, which are supported by the local tax base. The Proposed Project is expected to substantially expand the tax base in Onondaga County and surrounding municipalities, thereby providing additional resources to support both emergency and municipal services, and it is anticipated that municipalities would direct necessary investments to support those services.

Community Facilities Comment 16:

The project should be built to the north of Route 31 to protect Meltzer Park. Meltzer Park should be protected from being demolished.

Response: The Proposed Project would be constructed in the WPCP which is located on the north side of Route 31. There is no demolition of Meltzer Park proposed. In fact, as noted in FEIS Section 3.14, “[t]he park would remain open throughout construction... and would continue to be able to host both quiet recreational activity and active use of its athletic fields and other amenities throughout the year.”

Community Facilities Comment 17:

Will local fire departments have adequate staffing, resources and training to respond to semiconductor-specific chemical emergencies?

Response: See Responses to Community Facilities Comments 1, 2, 13, and 14.

Community Facilities Comment 18:

A commenter indicates that Micron should also clarify how it will ensure rapid notification and evacuation protocols for surrounding communities.

Response: FEIS Section 3.14 states that, “[i]n the event of a structural fire or a hazardous material spill requiring outside assistance, the ERT would notify Clay Fire via 911. Prior to operations, Micron, Clay Fire, and the Syracuse Fire Department would establish a joint protocol for when the Syracuse Fire Department’s hazardous material response unit would be brought in to address a relevant incident. Onondaga County DEM also would alert and deploy Cicero Fire as needed.” Incident responders would follow their established protocols for notifications to communities and if any actions by the community are needed.

Community Facilities Comment 19:

Micron should provide financial support for staffing and equipping local hazmat responders and commit to annual joint training exercises with local agencies and third-party evaluators.

Response: See Response to Community Facilities Comment 1, 2, 13, and 14.

Community Facilities Comment 20:

The conclusions in the DEIS that impacts on community services can be easily adjusted over the 16-year construction period is not supported by relevant projections, municipal confirmations or other facts. There are no details to support that rising municipal revenue will offset service needs.

Response: See Response to Community Facilities Comment 1, 2, and 4.

Community Facilities Comment 21:

Although the DEIS suggests that a feasibility study will be undertaken, there is no actual commitment by Micron to undertake any such action. This must be a requirement as a mitigation measure.

Response: As described in the FEIS Section 3.14, Micron would, as a mitigation measure, commit to, pay for and support ongoing training efforts with Clay Fire and other local fire departments. Micron also would work with Clay Fire to determine any future need for the development of a full-time professional fire service, and that the determination of future needs planning could be completed through a feasibility study or similar alternative method.

Community Facilities Comment 22:

The DEIS contains no facts to back up the statement that the increased tax base from induced growth would 'help' police services. Since it would only 'help' where will other revenue come from? The in-migration of workers during construction will likely cause a rise in incidents requiring police response, thereby taxing police and municipal services.

Response: See Responses to Community Facilities Comments 1, 2, 4 and 5.

Community Facilities Comment 23:

There are no details or analysis of the cost to professionalize or upgrade fire services.

Response: See Responses to Community Facilities Comment 1, 2, 14, and 19.

Community Facilities Comment 24:

What is the impact of having only one hazmat unit, which resides in the City of Syracuse. Will hazmat services need to be expanded and who will fund the expansion?

Response: See Responses to Solid Waste and Hazardous Materials Comments 57 and 59. Prior to operations, Micron, Clay Fire, and the Syracuse Fire Department would establish a joint protocol for when the Syracuse Fire Department's hazardous material response unit would be brought in to address a relevant incident. Coordination efforts will identify additional needs, if any.

Community Facilities Comment 25:

A commenter is concerned how the County will coordinate with surrounding towns to ensure that there is equitable distribution of tax revenues or state/federal aid to offset costs associated with emergency services.

Response: See Responses to Community Facilities Comments 1, 2, 9, 14, and 19; Responses to Town of Clay Comment 2.

Community Facilities Comment 26:

The existing designated snowmobile trail C7L is not addressed as a recreational resource. It is a corridor trail meaning highest classification in the statewide network of trails. It will used as a connection to Oneida Lake and to any destination on the statewide trail network. The trail has been actively use since 2002. The club that grooms this trail hopes the trail would continue through the National Grid service road or other location on the Micron property. Another commenter requested that the DEIS indicate whether the snowmobile trail will be relocated as part of this project, to avoid closure of an important community resource.

Response: As discussed in FEIS Section 3.14, portions of the existing snowmobile trail would be unavailable for use and the Snow Owls Club has been notified there is no space for relocations on the property. “The portions of the Snow Owls Snowmobile Trail noted above would be permanently closed, except for the four-mile segment of the trail in Oswego County running parallel to OCWA’s existing clear water transmission main, which, which could re-open after construction....Parties maintaining the snowmobile trail through year-to-year license agreements with private landowners would potentially be able to seek new agreements with landowners to re-route affected portions of the trail to avoid Proposed Project and Connected Action construction areas.” See FEIS Section 3.14. National Grid generally maintains good relations with snowmobile clubs that access the Company’s properties across its Upstate service territory and would continue to do so.

3.15 Socioeconomic Conditions**Socioeconomic Comment 1:**

The area is already seeing commitments to expand and improve the region’s civic infrastructure with needed investments in childcare and health care across the region.

Response: Comment noted.

Socioeconomic Comment 2:

Building permits for new housing are up by more than 50%, which will help address both current and future housing needs.

Response: Comment noted.

Socioeconomic Comment 3:

General statements were made concerning providing tax breaks or financial incentives to Micron. The taxpayers cannot afford to provide a tax benefit to the developers of the site. This is an inappropriate use of tax dollars.

Response: See Response to Purpose and Need Comment 2 (discussing the purpose and need for the Proposed Project and Connected Actions); Response to Purpose and Need Comment 3.

Socioeconomic Comment 4:

General concerns were raised regarding potential local economic benefits (jobs, tax revenue) not equitably reaching local workers, schools, and small businesses.

Response: Development of the WPCP is expected to significantly benefit Onondaga County and its residents. The local and regional socioeconomic benefits of the Proposed Project are adequately addressed in FEIS Section 3.15 Socioeconomic Conditions. The Proposed Project would introduce new job opportunities, grow local economies, generate additional sales and property tax revenues and payments in lieu of taxes (PILOT), and, over the 20-year term of the Green CHIPS Community Investment Fund (CIF), would invest \$500 million in local and regional initiatives that advance identified community needs, including funding for local workforce and education initiatives. See FEIS Appendix R-2.

The monies collected in additional tax revenues and PILOT payments would add to current local and regional school districts revenues. Micron has submitted an application to OCIDA for Phase 1, requesting a 49-year PILOT agreement. If approved, the PILOT agreement would exempt Micron from county, town, and school property taxes. In place of these local tax payments, Micron would make PILOT payments that would be apportioned to those taxing jurisdictions in an identical manner as the apportionment of property taxes using the applicable yearly tax rates. See FEIS Section 3.15.3.2, Funding for Local Governments and Taxing Districts.

The Proposed Project's projected induced growth is expected to generate substantial new revenues for local governments and taxing districts from new commercial businesses and household growth principally through the form of property and school taxes. The REMI Study estimates that a 4-fab facility's economic activity would, on average, generate nearly \$500 million annually in local government and taxing district revenues for municipalities within the region. See FEIS Section 3.15.3.2, Growth Inducing Effects; Appendix C-2 (REMI Study).

As discussed in FEIS Section 3.15.3.2, the Proposed Project would provide new employment opportunities within the local and regional study area for the foreseeable future. The Proposed Project would generate over 4,000 on-site construction jobs and over 9,000 permanent on-site operational jobs, providing long-term skilled employment opportunities for unemployed, underemployed, and job-changing residents in the local and regional study areas. Based on projected availability of union labor when accounting for other projects, including the Syracuse I-81 project's construction, it is estimated that approximately 2,700 workforce participants from the commuter shed might be available for construction of the Proposed Project. See FEIS Appendix Q, Table Q-50. The Proposed Project's operational labor needs are expected to be met in large part by existing labor force participants residing within reasonable commuting distance of the Micron Campus. See also Response to Socioeconomic Comment 8.

The Proposed Project would generate substantial new economic activity in the five-county region (i.e., growth inducing impacts), facilitating the growth of industries and commercial and residential development. By 2045 the Proposed Project would generate demand for nearly 9,500 jobs at regional supply chain businesses and approximately 23,500 jobs at regional governments, institutions, and businesses supporting the growth in regional household spending (approximately

33,000 off-site jobs in total). This growth in job opportunities within a range of industry sectors would be a significant benefit to the local and regional study areas.

Micron would also invest in recruiting, workforce training, and educational programs in the local and regional areas necessary to develop talent for the Proposed Project. See FEIS Appendix Q-3.2. Given the Micron Campus' proximity to local colleges and universities, the regional collaborations, and initiatives for training already in place, and with additional investments through the Green CHIPS CIF, it is reasonable to assume that Micron could exceed the 60 to 70 percent local job recruitment rates experienced at Micron's Boise, Idaho and Manassas, Virginia facilities. For the Proposed Project, this equates to over 6,300 permanent operational high-paying jobs secured by existing local and regional residents within the study area.

See also Response to Socioeconomic Comment 39, discussing access to employment and training.

Socioeconomic Comment 5:

Commenter stated that approving the Proposed Project is a short-sighted means to bring jobs and resources to the regional area.

Response: See Response to Purpose and Need Comment 2.

Socioeconomic Comment 6:

Commenters requested mechanisms and concrete plans (e.g., regional task forces, Micron-funded grants, citizens conservation management group, Community Benefits Agreement) that will be implemented to help local communities plan for and manage growth without overextending local budgets. Commenters suggested working with local, state and regional agencies to provide support for induced growth, including impacts to housing.

Response: FEIS Section 3.15 analyzes the socioeconomic impacts from the Proposed Project and Connected Actions and specific measures to mitigate effects on housing are addressed in FEIS Section 3.15.4. In addition to mitigation measures proposed in the FEIS, Micron is working with ESD to identify and provide funding for local and regional initiatives. See also Response to Environmental Justice Comment 2, discussing the community outreach conducted by the Central New York Community Engagement Committee (CEC) to help guide the \$500 million Green CHIPS Community Investment Fund (CIF) towards the community's most pressing needs and goals. See also FEIS Appendix Q-3.2. Over the 20-year term of the Green CHIPS, the CIF would invest \$500 million in local and regional initiatives that advance identified community needs. Local and regional groups interested in receiving CIF funding may submit a Letter of Intent. <https://esd.ny.gov/green-chips-community-investment-fund#how-to-apply> See Response to Socioeconomic Comment 19, discussing state funding support and initiatives for local and regional housing.

Socioeconomic Comment 7:

A commenter requested verification that Great Northern Mall is still planning on developing housing at the site.

Response: FEIS Table 4.2-1 includes the Great Northern Mall Redevelopment as a present and reasonably foreseeable project. The project proposes to develop a 541,651 SF complex of commercial, retail, supermarket, and hotel space, 755,850 SF of medical office space, 1,636 apartment units, and 875 hotel rooms.

Socioeconomic Comment 8:

General concerns were raised that Micron be required to hire a meaningful number of permanent local residents, including from marginalized local communities, particularly within the City of Syracuse, and that such employment targets be enforceable. Further concerns that the local jobs created must provide sustainable wages and benefits. Micron should be transparent with its hiring process, including educational requirements.

Response: See Response to Socioeconomic Comments 4, discussing Micron's hiring of local employees and investment in training. As stated in FEIS Section 2.1.1.6, "construction of the Micron Campus would require approximately 4,200 construction workers on-site daily during peak construction periods lasting roughly six months for each fab. Micron Campus operations would require at least 2,000 manufacturing employees for each fab, with the total number of manufacturing employees increasing sequentially as each fab comes online...Information on the local labor market suggests that approximately 2,000 local workers may be available for each phase of the Micron Campus construction, which could help reduce the number of construction crews traveling to Clay, NY from other geographical locations...At full production in 2045, the operational headcount of the Micron Campus, including manufacturing, business, and administrative employees, would be 9,005 employees, with a nominal remaining presence of approximately 300 construction workers."

As demonstrated in FEIS Appendix Q-3.1, Micron, Onondaga County, OCIDA, and ESD have taken steps to realize local economic opportunities from construction activity. Micron has committed to working with state and local partners and construction contractors and subcontractors to establish a target percentage of the construction workforce to be from disadvantaged populations. As explained in the FEIS Section 3.15.3.2, Micron will partner with CenterState Corporation for Economic Opportunity (CEO) and ESD to scale existing programs to train new construction workers and promote entry into trades. Micron is among the first signatories to U.S. Department of Commerce CHIPS Women in Construction Framework, which establishes best practices to double the number of women in construction over the next decade. Micron would encourage contractors to conduct focused recruiting and pipeline development activities to strive, in good faith, to meet the target, and Micron would require contractors to report their results. FEIS Appendix Q-3.1 also provides a list of the numerous specialized trades required for construction of Fabs, including concrete workers, pipe fitters and steelworkers.

Operational workers will require special skills, for which there is a regional and national shortage. Micron is investing in recruiting, workforce training, and educational programs to help develop a local workforce for work at the Micron Campus. Appendix Q to the FEIS identifies education and workforce programs that will help prepare a regional workforce for long-term operational jobs at the Micron Campus. Appendix Q-3.1 also provides a general overview of the qualifications for on-site manufacturing jobs. As stated in FEIS Section 3.15.3.2, Micron has estimated that 90 percent of on-site operational workers would be dedicated to manufacturing, and the remaining 10 percent would provide support services, including IT, security, quality, procurement, supply chain, smart manufacturing technology, finance, people, and legal services. Annual salaries plus cash bonuses to employees at the Micron Campus are expected to average approximately \$100,000. This amount exceeds the average annual wages per employee in Onondaga County (\$62,768 in 2023) and for manufacturing employment specifically (\$83,578).

See also Response to Socioeconomic Comment 39, for further discussion on targeted initiatives for hiring and training, including those from marginalized communities.

Socioeconomic Comment 9:

Induced growth job creation will be limited to the low-wage employment sectors, thereby furthering wage gaps and poverty issues in the regional communities.

Response: As stated in FEIS Section 3.15.3.2, “Micron has estimated that 90 percent of on-site operational workers would be dedicated to manufacturing, and the remaining 10 percent would provide support services, including IT, security, quality, procurement, supply chain, smart manufacturing technology, finance, people, and legal services. Annual salaries plus cash bonuses of employees at the Micron Campus are expected to average approximately \$100,000. This amount exceeds the average annual wages per employee in Onondaga County (\$62,768 in 2023) and for manufacturing employment specifically (\$83,578). Appendix Q-3 provides additional information on Micron manufacturing jobs and required skillsets. In addition to on-site Micron jobs detailed above, the Proposed Project would generate labor demand in industries supporting Micron’s construction and operations. The REMI Study projects that by 2041, approximately 33,000 non-Micron jobs would be created within the five-county region...by 2041 state and local governments (including public schools) are expected to receive the highest amount of job creation from increased household spending, followed by health care and social assistance; accommodations and food services; professional, scientific, and technical services; and retail trade.” See also Responses to Socioeconomic Comments 4 and 8.

Socioeconomic Comment 10:

General statements were made in support of the Proposed Project and its projected job creation and economic growth both regionally and nationally. The Proposed Project will build a durable ecosystem of innovation, education, skilled trade, resiliency and inclusion.

Response: Comment noted.

Socioeconomic Comment 11:

General statements were made in support of Central New York becoming a national leader in semiconductor manufacturing and creating a high-tech corridor within New York State.

Response: Comment noted.

Socioeconomic Comment 12:

General comments raised issues regarding population influx and whether local infrastructure (e.g., schools, health care facilities) can handle growth. Is there a plan for schools and health care facilities?

Response: The impact of population growth upon school enrollment and health care facilities due to the proposed development are addressed in FEIS Section 3.14 Community Facilities, Open Space and Recreation and Section 3.15 Socioeconomic Conditions. There are six (6) public school districts that serve the Local Study Area, which is comprised of the Town of Clay and Town of Cicero. As set forth in the FEIS Table 3.14-3, these districts have experienced declining enrollment, ranging from 9–38%. The direct effects of the Proposed Project are projected to result in minimal effects on school enrollment, as only 1,400 of the 4,200 projected Micron construction workers would be part of in-migrating households locating within the regional study area (including approximately 100 locating in the Towns of Clay and Cicero (local study area)). See FEIS Section 3.14.3.2.

Induced growth from the Proposed Project is expected to gradually begin reversing the current decline in school enrollments by school aged children across the five-county region. See FEIS Section 3.14.3.2, Growth Inducing Effects. However, even Onondaga County, which would experience the highest rate of induced growth in the region, would likely only experience an eight percent total increase in school aged children in a high induced growth scenario over the course of 21 years, from 2020 to 2041. This estimate assumed that the increase in the student population would be proportional to the increase in the number of households and that the households are evenly distributed throughout the Syracuse Metropolitan Statistical Area (MSA). This included the assumption that every employee hired for a permanent job at the Proposed Project will have school age children, making it a more conservative estimate than what may be the end result. Thus, the influx of students to local and regional schools would not be expected to overburden public school district capacity, and private schools in the area could also help absorb some of the increase in school-aged children. Moreover, induced population growth and business activity would help expand the regional tax base to further fund area school districts and any additional construction needs resulting from an increase in enrollment. See FEIS Section 3.15.3.2, Growth Inducing Effects. See also Response to Socioeconomic Comment 4.

As discussed in FEIS Section 3.14.3.2, construction and operation of the Proposed Project is not anticipated to materially increase the number of visits to hospitals and urgent care centers or other healthcare facilities located throughout Onondaga County. Micron and its contractors would implement and follow construction safety best management practices. Micron would deploy environmental health & safety (EHS) personnel to respond to and contain a range of construction

and operational incidents and would continuously employ its ERT to address medical incidents. As part of the construction of the Proposed Project, Micron would establish a dedicated on-site occupational health clinic (separate from the proposed Childcare Site healthcare center) staffed with an occupational medical physician, physician's assistant, registered nurse, licensed nurse practitioner, physical therapist, and other support staff. The ERT would transport injured workers or personnel to the on-site health clinic for medical care, as appropriate, with the goal of avoiding the use of local health care facilities except in instances of serious medical emergencies. See also Response to Community Facilities Comment 1.

Moreover, the induced growth effects from the Proposed Project would occur gradually over the 16-year construction period, would bring new healthcare workers to the region to support the growing population, and would likely generate additional economic benefits and tax revenue that would support planned expansions of healthcare facilities in Syracuse and other longer-term healthcare planning initiatives in the region. Independent of the Proposed Project, Upstate University Hospital and New York State are planning to expand the hospital's emergency room and increase the number of beds from 35 to 120 to better serve the area. With increased economic benefits, tax revenue, the expanded worker pool, and the planned Upstate University Hospital expansion, the Proposed Project would not be anticipated to result in significant adverse growth inducing effects on the regional healthcare facilities. See FEIS Sections 3.15.3.2, Growth Inducing Effects; 3.14.3.2, Growth Inducing Effects.

Socioeconomic Comment 13:

Please clarify the statements in the DEIS that the Proposed Project would not cause direct or indirect effects on the real property and housing in the local and regional areas but would cause induced effects.

Response: As explained in FEIS Chapter 3.0, “[t]he environmental analysis in Chapter 3 evaluates the direct and indirect effects of the No Action Alternative and the Preferred Action Alternative. Direct effects are effects that are caused by an action (e.g., the construction and operation of the Proposed Project) and occur at the same time and place as the action. Indirect effects are effects that are caused by the action and are later in time or farther removed in distance from the action but are still reasonably foreseeable. Indirect effects include growth inducing effects (e.g., effects the Proposed Project would generate through increases in population, commercial activity, and development in the surrounding region). In general, the lead agencies considered the effects on a resource to be significant if they would result in a substantial adverse change to the resource within the resource area.” For information on the growth inducing effects methodology, see Appendix C.

The direct socioeconomic effects of the Preferred Action Alternative are considered in FEIS Section 3.15.3.2, Relocation and Displacement (Direct Residential Displacement and Direct Business Displacement). This analysis found that the Preferred Action Alternative would not have the potential for significant adverse effects on socioeconomic conditions due to direct residential or business displacement. As stated in FEIS Section 3.15.3.2, Real Property and Housing (Construction and Operational Effects), “[t]he in-migration of workers and families for construction of the Proposed Project in the local and regional study areas would not create direct or indirect effects to real property and housing within the local and regional study area,” but would

necessitate induced effects from growth. Direct effects on housing would be found where the Proposed Project funds and undertakes the construction of housing; no such proposal has been put forth by Micron. Indirect effects are business to business purchases, of which there are no indirect effects on housing. Instead, the induced growth from the Proposed Project would create a need for additional housing in the local and regional areas.

As stated in FEIS Section 3.1.3.2, “housing demand in the areas of highest population growth is not expected to be met by existing rental units and for-sale homes, induced household growth would result in noticeable land use changes in some areas over time to accommodate new residential construction, such as through construction of new housing subdivisions on vacant, underutilized, or former agricultural land.”

Socioeconomic Comment 14:

Micron should conduct comprehensive impact analyses on housing, labor shortages, earnings distribution, and low-wage spinoff job impacts.

Response: FEIS Section 3.15 and Appendix Q provide a comprehensive review and analysis of the potential impacts, including growth inducing effects, on real property and housing and labor and employment, including potential wages. See Responses to Socioeconomic Comments 4, 8, and 9.

Socioeconomic Comment 15:

The DEIS does not contain details on projected price increases or housing cost trends tied to population growth.

Response: FEIS Appendix Q, Table Q-33 provides data on housing market trends for the Town of Clay, Town of Cicero, City of Syracuse and Onondaga County (January 2025). Table Q-42 provides data on housing market trends for the regional area for the same period. FEIS Section 3.15.3.2 states, “the local study area would experience increased demand for rental and for-sale housing, which in turn could lead to increases in property values, home purchase prices, and residential rents....While there would be rent pressures attributable to the Proposed Project’s induced growth in markets beyond the local study area, the projected growth within regional communities is more disperse, and in larger part attributable to non-Micron induced growth that would not be as immediate, allowing time for regional markets to respond to the increased demand through new housing production. Areas which are highly desirable to the incoming populations may see larger rent and home price increases; different communities may experience these increases at different temporal scales, although the property market should be expected to react to the new demand within approximately four years.”

Fluctuations in housing costs can result from several factors including but not limited to local regulations, supply chain costs, availability of developable land, and others. Due to the interaction of a variety of components, estimating long-term housing cost trends based on population growth is largely infeasible and does not offer the opportunity for reliable projections. Historical data shows largely varied paces of housing cost growth between the geographies making up the local and regional study area; see FEIS Section 3.15.2.2 Real Property, Housing, Relocation, and

Displacement (Local Study Area and Regional Study Area) for specific year-over-year changes in housing costs. FEIS Section 3.15.3.2 Growth Inducing Effects utilized ranged estimates based on available information to determine the distribution of population growth. While in some areas, the induced population growth may be large enough to cause changes in the local housing market, projecting price increases solely from this growth is not feasible.

Socioeconomic Comment 16:

General concern that Micron is not being transparent with its disclosure of anticipated permanent on-site job titles and salary ranges.

Response: See Responses to Socioeconomic Comments 8 and 9.

Socioeconomic Comment 17:

Provide support for not including the City of Syracuse in the analysis in the DEIS of potential for displacement of residents in the local study area from rising housing costs.

Response: The local study area is the area in which the Preferred Action Alternative has the potential to directly affect socioeconomic conditions. See FEIS Section 3.15.2. As the Proposed Project's footprint intersects the Towns of Clay and Cicero, these areas define the local study area. The regional study area is defined as the area in which the Preferred Action Alternative has the potential to indirectly affect socioeconomic conditions. As the City of Syracuse would not be subject to any direct effects, it is appropriate that this geography is included only in the regional study area.

The FEIS provides a comprehensive analysis of the City of Syracuse across all primary areas of indirect and induced assessment, including population, housing, local districts, and labor and employment, as it is part of the regional study area. Additionally, the FEIS specifically considers existing market conditions in the City of Syracuse (see Section 3.15.2.2 Affected Environment, Real Property, Housing, Relocation, and Displacement); projects potential household growth in Syracuse resulting from the Preferred Action Alternative (see Section 3.15.3.2 Growth Inducing Effects, Population and Demographics); and highlights potential future impacts unique to the area (see Section 3.15.3.2 Growth Inducing Effects, Real Property and Housing).

Socioeconomic Comment 18:

General comments noted that local employers will experience adverse impacts on their abilities to retain or pay workers. A commenter also requested additional information on short-term local labor shortages as a result of the Proposed Project.

Response: Potential impacts on the labor force are likely to be short-term. With respect to the construction industry, the Proposed Project has the potential to create temporary shortages within local and regional construction labor supply. Temporary labor shortages could lead to higher construction labor costs for some specialized trades in markets within the region. However, these potential adverse effects are expected to be limited and short-term as the market adjusts to new entries. See FEIS Section 3.15.3.2.

The potential for significant adverse short-term effects would be avoided through Micron's partnership with various stakeholders in the community to scale the construction workforce. Examples include partnering with CenterState Corporation for Economic Opportunity (CEO) and ESD to scale existing programs that train new construction workers and facilitate entry into the trades and partnering with the local Building Trades Unions to increase membership and encourage training opportunities on semiconductor-specific construction skills as well as planning to provide training and certifications through suppliers and distributors for semiconductor-specific construction skills, such as specialty welding skills. See FEIS Section 3.15.3.2.

Outside the construction industry, the Proposed Project could induce over 3.5 jobs in the region for every job created on-site. See FEIS Section 3.15.3.2. While the growth in job opportunities within a range of industry sectors would be a significant benefit to the local and regional study areas, the induced labor demand generated by the Preferred Action Alternative could lead to temporary labor shortages in some sectors where the existing labor force is unable to readily meet demand. This temporary shortage could lead to increases in labor cost. However, this potential adverse effect within the local and regional study areas is expected to be short term—likely during the earliest years of construction and operations, prior to any labor shortages being met through in-migrating workers and/or job training for existing unemployed or underemployed workers—and would not result in significant adverse effects on the labor market. See also Response to Socioeconomic Comment 8.

Socioeconomic Comment 19:

Multiple commenters raised concerns about affordable housing and increased demand could raise housing costs or rents for long-term residents. There is risk of indirect displacement of renters or homeowners, especially vulnerable or low-income households. The area already has a housing crisis. There should be a concrete plan to prevent indirect displacement of existing residents, reliance on state and local initiatives will not adequately address the impacts.

Response: The FEIS recognizes concerns regarding housing availability and affordability associated with induced growth associated with the Proposed Project. The effects of population growth from construction and operation of the Proposed Project on housing demand, property values and housing costs are fully addressed in FEIS Section 3.15.3.2.

These challenges from increased housing demand, costs and rents, and the potential indirect displacement of residents unable to afford their homes are expected to be short-term. See FEIS Section 3.15.3.2; see also FEIS Figure 3.15-3 (providing the estimated Proposed Project on-site Micron Campus construction jobs for 2025-2045). They also have been and continue to be addressed through investments from the State of New York through Governor Hochul's long-term statewide housing approach and New York Housing Compact initiatives; and local initiatives like the Onondaga County Housing Initiative Program (O-CHIP) and the OCIDA's tax exemption program for housing projects. See FEIS Section 3.15.4.

Governor Hochul has made housing and affordability a top priority and has enacted several programs aimed at increasing the production of housing, including \$650 million in state funding

for Pro-Housing communities and \$100 million in capital funding to assist with infrastructure to build new housing. Additionally, housing was identified as an immediate priority by the Community Engagement Committee and will be a central focus of the \$500 million CIF in Central New York. New housing supply—inclusive of affordable housing—would serve to control rent increases and is a critical component of meeting existing and future community demand for housing at lower income levels.

Currently, there are a number of identified planned projects in the local study area that are expected to generate an estimated over 4,000 new residential units and, thereby, alleviate pressure on the housing market. One of the largest planned projects is within the Town of Cicero: Lakeshore Village, a 602-unit multi-family housing development, will contain a variety of housing options, such as apartments, condominiums, single-family homes, and townhomes. Other planned residential and mixed-used projects anticipated in the local study area will introduce single-family homes and a mix of townhomes and apartments, as well as commercial retail, office space, and restaurants. See FEIS Table 3.1-2, Table 4.2-1, Appendix Q-2.2. The property market is expected to respond to the increase in housing demand from the Proposed Project within approximately four years of commencement of construction. See also Response to Socioeconomic Comment 15.

Socioeconomic Comment 20:

A commenter is concerned that house values within close proximity of the Proposed Project will decrease as a result of the Proposed Project.

Response: Reductions in home values are not anticipated. FEIS Section 3.15.3.2, Growth Inducing Effects, considers the potential effects of the Preferred Action Alternative on housing markets within the local and regional study areas and identifies the potential for short-term increases in house prices within markets due to the increase in local jobs and associated demand for housing from in-migrating workers. The FEIS finds that this effect would be most pronounced within close proximity of the Proposed Project. See also Response to Socioeconomic Comment 15.

Socioeconomic Comment 21:

A commenter provided general support for the significant economic benefits of the Proposed Project and its resulting beneficial effects on regional economic development policy goals.

Response: Comment noted.

Socioeconomic Comment 22:

The DEIS does not include reference to planned affordable housing within the local and regional areas.

Response: FEIS Appendix Q-2.2 provides an overview of the local and regional real estate and housing market, while Table 4.2-1 provides a list of present and reasonably foreseeable actions, including future housing developments in the local and regional areas for both affordable and market rate projects. See also FEIS Table 3.1-2.

See also Response to Socioeconomic Comment 19, for state funding for local and regional housing initiatives.

Socioeconomic Comment 23:

In the DEIS, page 3-503, it states that Micron will work with local agencies and stakeholders to identify actionable measures to address short-term housing impacts. Has Micron initiated this process?

Response: Micron has and continues to work with state and local agencies to address impacts to housing from the Proposed Project. See Response to Socioeconomic Comment 19, for discussion of state-funded housing initiatives.

Socioeconomic Comment 24:

General concerns were raised that the job growth estimates (e.g., use of the term “up to”) provided in the DEIS do not provide the required level of specificity and certainty.

Response: The use of terms such as “up to” reflects the uncertainty inherent in forecasting long-term induced job growth for a project of this scale. Actual employment levels will depend on factors such as market demand, build-out timing, and operational needs, which cannot be predicted with precision at this stage. Estimates are provided to disclose the potential range of outcomes without overstating certainty.

Socioeconomic Comment 25:

The DEIS should include an analysis of how the Project will reduce and prevent poverty, including child poverty. Micron should commit to actions that reduce poverty, especially child poverty, in Onondaga County and the City of Syracuse.

Response: The comment, which is focused on existing conditions, goes beyond what is required by NEPA and SEQRA. Notwithstanding, FEIS Section 3.15.2.1 provides an analysis of poverty rates within the local and regional study areas while FEIS Appendix Q, Tables Q-2 through Q-10 provide additional population and demographics data for the local study area. Further, as discussed in FEIS Section 3.15.3.2, increased economic activity due to the presence of the Proposed Project, as well as anticipated investments into educational resources through the Green CHIPS CIF, create the potential for reduced poverty and increased employment opportunities. See also Response to Socioeconomic Comment 4, for discussion of the economic benefits of the Proposed Project.

Socioeconomic Comment 26:

The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g., education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers.

Response: See Responses to Socioeconomic Comments 8 and 39.

Socioeconomic Comment 27:

Micron should implement targeted housing mitigation measures with a regional housing mitigation fund and dedicated staffing.

Response: FEIS Section 3.15.4 discusses mitigation measures to address the Preferred Action Alternative's has the potential to result in a short-term significant adverse effect on housing. Although Micron does not control the housing market and cannot specifically mitigate such effects, Micron will continue to work with agencies and local stakeholders to identify specific actionable measures to avoid or minimize the potential for this short-term significant adverse effect on the local housing market. As detailed in Chapter 4, there are already a number of planned projects in the study area that would increase housing supply within those communities that are predicted to experience induced growth from the Proposed Project and, therefore, may serve to reduce rent pressures within the local and regional study areas. Over time, the production of additional housing including affordable housing, would avoid the potential for long-term significant adverse effects due to rent increases. Micron has provided funding for the Community Investment Fund, of which housing initiatives are a priority for funding awards. See FEIS Appendix R-2. See also Response to Socioeconomic Comment 19, discussing state housing and funding initiatives.

Socioeconomic Comment 28:

A commenter is concerned that the number of Micron employees during operation will decrease with future advances in technology, providing less job benefits than stated in the DEIS.

Response: The FEIS provides projections of the direct (on-site) operational jobs at the Micron Campus. As demonstrated in Figure 3.15-4, operational jobs are projected to steadily increase as fabs are brought online over the Proposed Project's full build. By 2041, with four fabs in operation, there would be approximately 8,200 permanent on-site operational jobs. When at full operational capacity in 2045, the Proposed Project would generate approximately 9,000 permanent on-site operational jobs. Concerns raised about decreased operational jobs at the Micron Campus are speculative and contradict the analysis of reasonably foreseeable circumstances provided in the FEIS.

Socioeconomic Comment 29:

A commenter requested information on whether local governments have analyzed how local and regional areas will support housing for the initial wave of in-migrating Micron workers.

Response: Local housing policies and related regulations will largely determine the capacity and flexibility of areas to accommodate in-migrating Micron workers. FEIS Appendix D-3 summarizes the public policies related to land use and planning in the local region (e.g., local comprehensive, land use, and transportation plans), including the Onondaga County Comprehensive Plan (2023)

and the draft Vision Cicero. Beyond the policies highlighted in Appendix D-3, the assessment of socioeconomic impacts was informed by a range of studies providing additional context, including the Syracuse Housing Strategy (2024), Plan Onondaga (2023), City of Syracuse Comprehensive Plan 2040 (2012), Vision CNY (2020), and the Central New York REDC Report (2022). See Appendix Q for further information on these resources.

Socioeconomic Comment 30:

A commenter requested clarification of whether the term “existing rental units” refers only to housing that is currently habitable and available or also includes the many units in the City of Syracuse and nearby villages that are vacant or underutilized due to disrepair and long-term disinvestment. What measures will be used to promote urban residency?

Response: Existing rental units refers to the number of units that are available and suitable for occupancy. FEIS Appendix Q presents detailed data on housing vacancy status sourced from the U.S. Census Bureau’s American Community Survey (ACS) 2019-2023 5-Year Estimates. Additional discussion of the City of Syracuse and deferred maintenance can be found in FEIS Section 3.15.3.2 Growth Inducing Effects (Real Property and Housing).

The introduction of a major employer within commuting distance of Syracuse—an area with available housing and urban amenities attractive to those seeking an urban lifestyle—would generate induced employment both within Syracuse and in surrounding communities accessible by commuting. As shown in FEIS Table 3.15-5, by 2041, the City of Syracuse is projected to experience the largest number of project-related induced households among municipalities in Onondaga County. Within urban cores like Syracuse, the resulting increase in housing demand could help to address longstanding issues related to deferred housing maintenance. Higher demand can also be expected to spur the development of new housing throughout the region, including housing types that have historically been underdeveloped in the region. See FEIS Section 3.15.3.2. See Response to Socioeconomic Comment 6, for discussion of support for induced growth. See also Response to Socioeconomic Comment 19, discussing state funding support and initiatives for local and regional housing.

Socioeconomic Comment 31:

Commenters requested clarification on the methodology or contingencies used to model population growth in the local and regional study areas.

Response: As stated in FEIS Section 4.3.15.1, “[t]o assess the potential magnitude of cumulative population effects at a community level, this assessment utilizes ranged estimates of cumulative household growth at the town and county levels based on SMTC growth projections for the Syracuse Metropolitan Planning Area (MPA), which is inclusive of known planned projects such as those in Table 4.2-1, as well as residential growth projections for the regional study area from the 2022 REMI Study.” SMTC growth projections are official forecasts prepared by the regional planning agency using established methodologies. These forecasts are the standard data sources required for environmental review and provide a consistent basis for evaluating potential impacts. FEIS Appendix D-3 includes a detailed summary of the Syracuse Metropolitan Transportation

Council (SMTC) 2050 Long Range Transportation Plan 2020 Update. FEIS Appendix C provides additional detail on the methodologies used to model population growth in the local and regional study areas, including the approach and findings of the 2022 study prepared by REMI and sponsored by Empire State Development.

Socioeconomic Comment 32:

Information should be provided as to whether government subsidy levels and/or payments under PILOT agreements will be adjusted if the Proposed Project fails to provide the currently estimated on-site employment.

Response: As a Green CHIPS project, Micron must meet certain eligibility conditions and achieve job and investment commitments in order to be eligible for specific levels of refundable tax credits under Empire State Development's Excelsior Jobs Program. The refundable tax credits are directly calculated based on Micron's qualified expenditures and number of jobs and salaries created each year. Additionally, any PILOT agreement approved by the Onondaga County Industrial Development Agency is subject to possible termination and recapture of benefits for failure to meet required on-site employment numbers.

Socioeconomic Comment 33:

Commenter questioned whether the REMI Study utilized the population and household projection information from the 2022 amendment to the Syracuse Metropolitan Transportation Council.

Response: The REMI Study did not utilize the population and household projection information from the 2022 amendment to the Syracuse Metropolitan Transportation Council. See Response to Socioeconomic Comment 31. See FEIS Appendix C-2, providing the 2022 REMI Study methodology.

Socioeconomic Comment 34:

Micron should provide employees access to on-site childcare, pay equity and a diverse workforce that would be allowed to unionize.

Response: See Responses to Socioeconomic Comments 4, 8, and 39. The Proposed Project includes construction and operation of the Childcare Site, which includes a childcare center, recreation center, and healthcare center for Micron employees. See FEIS Section 2.1.3.

FEIS Section 2.1.1.6 discusses the projected labor force required for both construction and full-time operation of the Proposed Project. Section 3.15 (Socioeconomic Conditions) and Appendix Q also discuss construction employee considerations. As stated in FEIS Section 3.15.3.2, "Micron's partnership with various stakeholders in the community to scale the construction workforce including: partnering with CenterState Corporation for Economic Opportunity (CEO) and ESD to scale existing programs that train new construction workers and facilitate entry into the trades; partnering with the local Building Trades Unions to increase membership and encourage training opportunities on semiconductor-specific construction skills; and planning to

provide training and certifications through suppliers and distributors for semiconductor-specific construction skills, such as specialty welding skills.”

Micron has also entered into a Project Labor Agreement with local trade unions, which establishes a framework for labor-management cooperation and stability throughout construction. This agreement outlines the use of the Center for Military Recruitment, Assessment and Veterans Employment and its “Helmets to Hardhats” program. See FEIS Appendix Q-3.1.

Socioeconomic Comment 35:

Micron should partner with unions and community organizations for workforce development.

Response: See Responses to Socioeconomic Comments 8 and 34.

Socioeconomic Comment 36:

Commenters are concerned about adverse impacts to local school funding as a result of tax abatements granted by IDAs.

Response: See Responses to Socioeconomic Comments 4, 12, and 25.

Socioeconomic Comment 37:

The Final EIS should evaluate whether there are an adequate number of qualified contractors and rail-accessible aggregate availability to be able to handle all this construction under the schedules presented.

Response: The FEIS evaluates construction schedules, workforce requirements, and potential environmental impacts associated with the Proposed Project. See FEIS Section 3.15. While the FEIS identifies the number of construction workers needed and the overall sequencing of construction activities, procurement of available contractors or rail-accessible aggregate supplies are operational and commercial matters that will be managed by the project sponsor and relevant suppliers during the construction process. See also Responses to Socioeconomic Comments 4 and 18, discussing Micron and state commitments to address labor shortages.

Socioeconomic Comment 38:

General concerns were raised about increased real property tax liabilities for existing residents due to increased property values as a result of the Proposed Project. Existing housing values will increase because of the Proposed Project thereby increasing property taxes.

Response: See Responses to Oswego County Comment 24 and Socioeconomic Comment 19, discussing state initiatives for housing in the region. Notwithstanding, economic impacts, such as impacts to the value of individual homes, are beyond the scope of NEPA and SEQRA.

Socioeconomic Comment 39:

Micron should make training and apprenticeship commitments enforceable, with clear eligibility, partnerships, and targeting of marginalized workers.

Response: See also Responses to Socioeconomic Comments 4 and 8. Micron's multibillion dollar investment reflects a strong commitment to staying and growing in the area, as it intends to establish and sustain operations in the region over the coming decades. As discussed in FEIS Section 2.1.16, construction of the Micron Campus will require approximately 4,200 construction workers on-site daily during peak periods, which are expected to last about six months for each fab. Once operational, each fab will employ at least 2,000 manufacturing workers, with staffing levels increasing as additional fabs come online. Labor market data indicates that around 2,000 local workers may be available for each construction phase, potentially reducing the need for crews to travel from outside the Clay, NY area. By 2045, when the campus reaches full production, the total operational workforce—including manufacturing, business, and administrative staff—is projected to be 9,005 employees, with a residual construction presence of approximately 300 workers.

In the Community Investment Framework (CIF), Micron has pledged to work with state and local partners and construction contractors and subcontractors to establish a target percentage of the construction workforce to be from disadvantaged populations. Specifically, Micron has committed to use good faith efforts to achieve 30% of eligible construction spend from eligible categories with businesses owned by socially and economically disadvantaged individuals (SEDI). Micron is partnering with ESD to identify business and industry specific skills that could benefit the small businesses who are interested in these opportunities and help them with navigating through existing and new resources, such as gaining access to capital and bonding. Additionally, Micron has committed to establishing a target percentage of permanent hires for facility operations to be made from targeted census tracts and historically disadvantaged populations. See EIS Appendix Q.

Micron has also pledged to use good faith efforts to achieve 20% of eligible operating spend with SEDI-owned businesses. To ensure that these goals are met, Micron will require applicable Tier 1 and Tier 2 suppliers to establish spend goals on their contracts as well. Micron and its general contractor hosted an opportunities and awareness session for local and diverse subcontractors, vendors, suppliers, and professional service providers in Syracuse.

Micron's commitments to local community colleges have already been realized. In 2023, Governor Hochul unveiled plans for a new state-of-the-art cleanroom simulation lab at Onondaga Community College (OCC) made possible by a \$5 million grant from Micron, the largest ever single donation in OCC history. Students at OCC and other SUNY community colleges can also take advantage of Micron's new internship program that provide hands-on, experiential learning for New York students in either its Boise, Idaho or Manassas, Virginia fabs, in preparation for joining the Clay, NY fab once the facility is operational.

In addition, the \$200 million ON-RAMP program will build four new workforce development centers in strategic, high impact locations across upstate New York. The South Side of Syracuse will be home to the state's flagship ON-RAMP Center and will provide robust wraparound services to connect diverse and skilled New Yorkers with careers in dynamic, high-growth advanced manufacturing industries like semiconductors.

Socioeconomic Comment 40:

Commenters requested data to support the conclusion that adverse impacts on housing and rent prices will be temporary, including in environmental justice communities. Commenters requested that impacts to housing and rent be considered permanent and properly evaluated.

Response: The FEIS's impact assessment of the housing market utilized data from the U.S. Census Bureau, sales and price data from Redfin, and a variety of housing studies from local governments and the Central New York Regional Economic Development Council (see Appendix Q, Section Q-2.2 for more information on these sources). As described in FEIS Section 3.15.3.2, Growth Inducing Effects, Real Property and Housing, "while there would be rent pressures attributable to the Proposed Project's induced growth in markets beyond the local study area, the projected growth within regional communities is more disperse, and in larger part attributable to non-Micron induced growth that would not be as immediate, allowing time for regional markets to respond to the increased demand through new housing production. Areas which are highly desirable to the incoming populations may see larger rent and home price increases; different communities may experience these increases at different temporal scales, although the property market should be expected to react to the new demand within approximately four years." Determining the precise timing of market reactions to new demand would be largely speculative and not necessary for determining the potential for significant adverse impacts under SEQRA and NEPA. However, higher demand for housing can be expected to spur further development in a variety of housing types and geographies, including in areas like the City of Syracuse, where a portion of the housing stock has been rendered unavailable due to deferred maintenance resulting from low housing costs. See also Response to Socioeconomic Comment 19.

Socioeconomic Comment 41:

The DEIS estimate of 5,852 housing units currently planned for development falls far short of the 27,546 estimated to be required by Micron in migration. Further, none of the listed units have been designated as affordable.

Response: FEIS Table 3.15-5 states that the projected-induced households by 2041 is 27,546. Effects from induced growth, however, are anticipated to be experienced over time, as the Proposed Project will be constructed over a 16-year period. As discussed in FEIS Section 3.15.3.2, Growth Inducing Effects, Real Property and Housing, in-migrating workers would be expected to settle in local and regional areas, or beyond. "There are numerous communities within reasonable commuting distance of the Micron Campus (i.e., within approximately 45 minutes), such that demand pressures created locally would be alleviated to some degree by housing availability in

the broader regional study area.” See also FEIS Appendix Q, Table Q-37 (showing that the regional study area had 36,906 vacancies in 2023).

While FEIS Table 4.2-1 provides a list of known economic development projects anticipated for completion within the regional study area, primarily in Onondaga County, it is anticipated that the induced growth from the Proposed Project will spur future housing developments throughout the region to accommodate long-term estimated population projections. See also Response to Socioeconomic Comment 19, providing a discussion of state funding for local and regional housing initiatives, and Response to Socioeconomic Comment 22, providing a discussion of anticipated future housing developments.

Socioeconomic Comment 42:

Commenter requested information on whether the Micron in-migration can be accommodated before permits are issued for this project. Have Towns expressed support for or against these residential growth projections? And if so, include this evidence to document each towns’ concurrence or disfavor.

Response: The FEIS incorporates available information from local comprehensive plans and land use studies, including the Town of Clay Northern Land Use Study and Town of Cicero Comprehensive Plan, which identify growth trends and policies relevant to accommodating potential population increases. The FEIS further acknowledges that actual residential growth is subject to separate municipal approvals, permitting processes, and market dynamics. FEIS Section 3.15.3.2. While the Towns of Clay, Cicero, and surrounding municipalities have provided input during the environmental review process, the FEIS does not serve as a mechanism to formally approve or disapprove housing developments.

Various municipalities also commented in favor of the Proposed Project as part of the comment period on the Draft EIS. See, e.g., Response to Oswego Comment 1; Response to Clay Comment 1; Response to Syracuse Comment 5.

Socioeconomic Comment 43:

A commenter noted that recent changes to wetland regulations have affected the ability of the City of Troy to build planned residential housing units. The DEIS accounts for the need for new housing but does not account for the combined effect of wetland restrictions, infrastructure capacity, and transportation network changes on where new housing can be built. The commenter requested regulatory flexibility to address housing needs.

Response: Decisions regarding regulatory flexibility, wetland permitting, and local housing approvals fall under the authority of the relevant federal, state, and local agencies and are outside the scope of the FEIS. See also Response to Socioeconomic Comment 22, providing a discussion of anticipated future housing developments.

Socioeconomic Comment 44:

The DEIS failed to take into account that some migrating workers will bring their families to the area, while others will not, and that some temporary workers may choose to stay permanently.

Response: See Response to Socioeconomic Comment 4. The FEIS accounts for population growth and workforce in-migration in the local and regional study areas using planning-level projections. These projections incorporate estimates of household formation and population change resulting from the Proposed Project and Connected Actions. While it is possible that some migrating workers may bring families, and some temporary workers may remain permanently, the FEIS uses reasonable assumptions based on available demographic data to estimate the likely population and household growth. These assumptions are intended to capture the range of potential environmental effects without requiring precise tracking of individual decisions, which are inherently uncertain. See Response to Socioeconomic Comment 31, discussing methodology for modeling data.

Socioeconomic Comment 45:

The REMI Report states that the Proposed Project will result in 44,943 jobs in the regional area by 2055, with 5.5 jobs created for every 1 Micron job. Assuming 2.31 persons per household and 1 Micron worker per household, this would result in a population growth of over 100,000 people and 49,500 jobs if 5.5 jobs created for every one Micron. The DEIS failed to acknowledge this discrepancy in the data.

Response: There is no discrepancy. The 2022 REMI Study states on page 3, “[f]or every direct company hire, there would be about 5.5 other jobs created in the state economy.” In contrast, the FEIS reporting of jobs creation was specific to the local and regional study areas, not the entirety of New York State. FEIS Section 3.15.3.2 Growth Inducing Effects, Labor and Employment, states, “[w]hen accounting for both supply chain jobs and jobs at businesses supporting household spending, based on projections from the REMI Study, the Proposed Project could induce over 3.5 jobs in the region for every job created on-site.”

In addition, not all direct, indirect, and induced jobs created will be filled by in-migrating workers. Rather, many of the jobs created by the Preferred Action Alternative would be filled by existing local residents; local resident-workers and their families would not grow the population, as they are already part of the existing regional population.

Socioeconomic Comment 46:

A commenter raised a concern that converted farmland for wetland mitigation in Oswego County will be taken off the tax rolls, and that tax revenue will be lost.

Response: See Response to Oswego Comment 6.

3.16 Environmental Justice

Environmental Justice Comment 1:

General comments were made that the Project is inconsistent with the CLCPA's disadvantaged community requirements. General comment was made that the Proposed Project and Connected Actions will disproportionately impact potential environmental justice areas (PEJAs)/disadvantaged communities (DACs) and low-income and minority communities.

Response: Section 7(3) of the CLCPA requires all state agencies to ensure its permitting decisions will not disproportionately impact disadvantaged communities (DACs). See Response to Environmental Justice Comment 7. DACs are identified by using NYSDEC's Disadvantaged Communities Assessment Tool (DACAT). The closest DAC to the Proposed Project is five miles south in the North Syracuse area. As such, the NYSDEC, in accordance with its guidance, has determined that there are no DACs that will be disproportionately burdened by the Proposed Project.

As detailed in FEIS Section 3.16, a full analysis of the potential impacts of the Proposed Project and Connected Actions on DACs as well as low-income and minority communities within the study area was conducted in compliance with all applicable state laws, regulations, and policies. See FEIS Table 3.16-1. The study area was selected as the area with the greatest potential for adverse effects and informed the public outreach process. See FEIS Section 3.16.2. Although this expansive study area was selected to be inclusive and to include study areas from other technical analysis, the potential adverse effects from construction and operation of the Preferred Action Alternative on DACs and minority or low-income communities are expected to be limited to within an approximately 5-mile radius around the Proposed Project sites, and a ½ mile of the Connected Actions. See FEIS Section 3.16.3.2.

As outlined in FEIS Section 3.16.2.3, DACs, low-income and minority communities within the study area were designated. The DACs largely overlap with the identified minority and low-income communities (see Figure 3.16-2). See Appendix R-1 for a detailed summary of the burdens and vulnerabilities for each DAC in the study area.

As summarized in FEIS Section 3.16.3.3, "when analyzing the associated DAC burdens at or above the 80th percentile, the Preferred Action Alternative would not cause or increase a disproportionate burden from construction or operation of the Proposed Project or Connected Actions. Similarly, in the low-income and minority communities identified within the study area, the Preferred Action Alternative would not cause or increase a disproportionate burden within those communities, except a potential temporary adverse impact on housing and rent pricing. Instead, the Preferred Action Alternative would produce beneficial effects for the local and regional communities, including identified DACs and minority and low-income communities, by generating thousands of new jobs both on- and off-site through business-to-business supply chain services, stimulating local and regional development through induced residential and worker spending, generating additional tax revenues and, over the 20-year term of the Green CHIPS

Community Investment Fund (CIF), by investing \$500 million in local and regional initiatives that advance identified community needs.”

Environmental Justice Comment 2:

There was insufficient outreach to environmental justice, disadvantaged or underserved communities.

Response: A summary of Micron’s public outreach program to DACs and low-income and minority communities is provided in FEIS Appendix R-2. In addition to the public outreach and comment periods required by SEQRA, Micron provided enhanced public outreach to identified DACs, low-income and minority communities within a defined radius of the Proposed Project and Connected Actions. Specifically, prior to the SEQRA scoping process, Micron conducted two environmental justice focus groups to provide communities with an overview of the Proposed Project and next steps for environmental review, solicit feedback on Proposed Project elements, and gain an understanding of community priorities. These focus group events were attended by over 30 individuals from various environmental and community-based organizations in the greater Syracuse metro area. Micron led an additional 16 public outreach events to DACs and low-income and minority communities, including a site walkthrough with Tribal Nations representatives and various community education opportunities. These events are outlined in FEIS Appendix R-2. Concerns raised during public outreach events were considered and weighed in the development of the DEIS. Further public outreach, including to DACs and low-income and minority communities, will continue during construction and permitting, as appropriate.

In addition, extensive public outreach has been conducted through the Central New York Community Engagement Committee (CEC), which is made up of local stakeholders to ensure meaningful participation in the oversight of Micron’s investments in the local and regional communities. See FEIS Appendix R-2. The CEC outreach included a comprehensive representation of the region’s diverse communities to ensure that underrepresented and marginalized groups were integrated into the planning process. The Committee provided materials in Spanish and employed bilingual facilitators.

The CEC engaged in public hearings, focus groups, one-on-one interviews, and online surveys to identify and compile local priorities for inclusive growth and benefits to the greater Central New York region. 12,734 residents and over 316 local organizations participated in the CEC’s engagement efforts. These engagements included:

- Public events and meetings attended by over a thousand Central New Yorkers
- Canvassing efforts in communities across the region
- Presentations both online and in person
- Focus groups targeted at diverse and underrepresented groups
- Digital engagements, including regular mass emails, online surveys, and a website available in both Spanish and English

The Committee's findings were published in the [Community Priorities Document](#) (CPD) published in June 2024. The CPD represents the strategic framework to help guide the \$500 million Green CHIPS Community Investment Fund (CIF) towards the community's most pressing needs and goals. The CIF was created in partnership with ESD with Micron contributing at least \$250 million, ESD contributing \$100 million, and the remaining funding being raised from local, statewide and national partners.

Environmental Justice Comment 3:

Community outreach to environmental justice communities must address barriers to participation, such as transportation, digital access and language.

Response: See Response to Public Review Comment 1. Neither technology nor transportation was a barrier to meaningful public participation. The DEIS was made available to the public in multiple formats. Electronic versions were available on OCIDA's and CPO's websites through links on Micron's website. Paper copies of the complete DEIS, with appendices, were also available for public review at OCIDA's offices as well as at both the Town of Clay and Town of Cicero municipal offices, and the Onondaga County Public Library, in the main branch at 447 South Salina Street. Computer access was not needed to review the document. In addition, computer access was not needed to participate in the comment process. In addition to email, comments were accepted at the OCIDA mailing address and in-person. Indeed, some commenters participated by submitting letters and postcards.

See Response to Public Review Comment 10; Response to Environmental Justice Comment 2.

Environmental Justice Comment 4:

General concerns that the environmental justice analysis in the DEIS is deficient because it should have analyzed a larger area around both the Proposed Project and Connected Actions for its effects on environmental justice, especially given that this is one of the largest development projects in NYS history.

Response: See Response to Environmental Justice Comment 1. The study area was established consistent with current New York State laws, regulations, guidance and policies. See FEIS Table 3.16-1. As described in FEIS Section 3.16, the study area was defined using census tract and block group data to identify DACs and minority and low-income communities most likely to experience direct or reasonably foreseeable indirect impacts from the Proposed Project and Connected Actions. See FEIS Sections 3.16.2, 3.16.3.2. Further detail on methodology and geographic boundaries is provided in Appendix R-1, which documents the demographic analysis, data sources, and the rationale for the delineated study area.

Environmental Justice Comment 5:

Micron should quantitatively and specifically evaluate the long-term impacts of growth inducing effects on environmental justice.

Response: See also Response to Environmental Justice Comment 1. The growth inducing effects from the Proposed Project on low-income and minority communities and DACs within a 5-mile radius of the Proposed Project and 1/2-mile radius of the Connected Actions is provided in FEIS Section 3.16.3.2, Growth Inducing Effects. As detailed in that section, the Preferred Action Alternative is expected to generate long-term benefits for DACs and minority, and low-income communities through job creation, workforce training, and investments via the Green CHIPS Community Investment Fund. While some short-term pressures on housing and rents may occur, these effects are expected to be temporary and mitigated over time through increased housing supply and local planning initiatives. Overall, induced growth could increase demand for services such as police, fire, and healthcare, but these impacts are anticipated to be manageable and not disproportionately affect DACs or low-income and minority communities. The project is not expected to result in a disproportionate pollution burden, and long-term economic and social benefits are projected for the study area.

Environmental Justice Comment 6:

The DEIS should address how air emissions may exacerbate pre-existing air quality concerns in DACs.

Response: The impacts on air quality from the Proposed Project and Connected Actions were analyzed and discussed in FEIS Section 3.6. The analysis of air quality impacts in DACs and low-income and minority communities is in accordance with applicable NYSDEC guidance and policy documents and state law (see Table 3.16-1). Section 3.16 considered whether the Proposed Project and Connected Actions would cause or increase a disproportionate pollution burden on DACs and low-income and minority communities within the study area. As discussed in Section 3.16.3.2, impacts to air quality from the project are an effect common to all DACs and minority or low-income communities within the study area, since many of the effects would be the same or similar across this distance. The primary source of air quality emissions associated with the Proposed Project is the Micron Campus, which represents over 90 percent of the emissions associated with the Preferred Action Alternative. The Micron Campus is not located within a DAC. The nearest DAC is approximately five miles away from the Micron Campus. As described in Section 3.6 (Air Quality), at all locations surrounding the Micron Campus, the Preferred Action Alternative would not result in an exceedance of the NAAQS. Furthermore, the dispersion modeling associated with the Preferred Action Alternative affirms that ambient pollutant concentrations are highest immediately adjacent to the Micron Campus and decrease with distance in all directions as one moves away from the Micron Campus. This confirms that pollution burdens are not disproportionate to any of the DACs within the study area.

Environmental Justice Comment 7:

Micron must evaluate how their contributions to climate change will affect environmental justice communities. CLCPA GHG and DAC compliance need to be evaluated.

Response: See Response to Environmental Justice Comment 1 and 6. As discussed in Section 3.16.3.2, while the Proposed Project would result in a significant adverse effect related to greenhouse gas emissions, these types of emissions contribute to global climate change, which is a regional issue and not specific to individual communities. Moreover, the nearest DAC is nearly five miles away from the Proposed Project sites. Micron has committed to controlling the direct GHG emissions from operation of the four fabs at the Micron Campus to maximum extent practicable. Therefore, the Proposed Project would not cause or increase a disproportionate pollution burden related to greenhouse gases on DACs within the study area.

The CLCPA is a separate analysis from the FEIS. In accordance with its guidance, NYSDEC has determined that there are no DACs that will be disproportionately burdened by the Proposed Project. A copy of Micron's CLCPA analysis is attached to the FEIS in Appendix J-2.

Environmental Justice Comment 8:

Micron should be required to report on where waste from the Project site will be transported to and evaluate the environmental justice impacts on these locations.

Response: See Response to Solid Waste & Hazardous Substances Comment 70, for discussion of disposal locations for solid waste and hazardous materials from the project.

The exact location of where waste will be disposed is not yet known, and Micron does not have control over the final destination of the waste. Any analysis of the environmental justice impacts of a disposal facility would be conducted as part of that facility's permitting/environmental review process.

While the Proposed Project may utilize existing landfills in and outside of the five-county region, the Proposed Project would follow all applicable regulations and would include waste minimization measures. Micron would be subject to Federal and State solid and hazardous waste management regulations, and would work with vendors to arrange for transportation, shipment, and disposal of waste at facilities authorized to receive industrial and other waste. Therefore, the Proposed Project is not anticipated to cause or increase a disproportionate pollution burden related to solid or hazardous waste on DACs or minority or low-income communities within the study area. See also FEIS Section 3.16.3.2.

In addition, all trucks loaded on the Micron Campus would exit the vicinity using only approved truck routes. These are the most appropriate routes and take into account: (a) limiting transport through residential areas and past sensitive sites; (b) prohibiting off-site queuing of trucks entering the facility; (c) limiting total distance to major highways; and (d) overall safety in transport.

At this point in time, however, generation of solid or hazardous waste or the use of hazardous materials from construction and operation of the Connected Actions would be limited or negligible

and would be subject to regulatory requirements. Therefore, the Connected Actions would not cause or increase a disproportionate pollution burden on DACs or low-income and minority communities within the study area related to solid or hazardous waste.

Environmental Justice Comment 9:

Micron should be required to develop a community-expert advisory and oversight committee that can assist with ongoing and meaningful community engagement. The community engagement to date was insufficient.

Response: See Response to Nation Comment 35. See also Response to Environmental Justice Comment 2, discussing the sufficiency of public outreach.

Environmental Justice Comment 10:

Commenters stated that a Supplemental EIS should be prepared that evaluates cumulative burdens on DACs. The DEIS fails to conduct a cumulative burden analysis as required under NYSDEC Commissioner Policy 29 (CP-29) and pending SEQRA revisions.

Response: There is no need for a supplemental EIS. The Proposed Project would be located in the Town of Clay, New York, at the WPCP, which is not designated as a DAC. The closest DAC to the Proposed Project is five miles south in the North Syracuse area. Therefore, the Proposed Project is not likely to disproportionately burden or otherwise impact a DAC. In addition, NYSDEC Commissioner Policy 29 (CP-29) does not apply here as NYSDEC is not the lead agency.

Notwithstanding, the FEIS evaluated potential cumulative impacts on minority and low-income communities and DACs. See FEIS Section 4.3.16; see also Response to Cumulative Impacts Comment 9. As detailed there, none of the projects identified in Table 4.2-1 would be located within a low-income or minority community or DAC. The FEIS acknowledged that certain reasonably foreseeable housing, retail commercial, industrial, roadway improvement, transit improvement, regional trail network improvement, and infrastructure improvement projects may be located near a low-income or minority community or DAC and therefore have the potential to adversely affect it. The exact impact of certain impacts would be dependent on the nature and extent of ultimate development. However, many of the projects identified in Table 4.2-1 would have anticipated benefits for low-income and minority communities and DACs.

As such, there is no need, nor regulatory requirement, to prepare a supplemental EIS to further assess potential cumulative impacts on DACs and low-income and minority communities in the study area. Any future development in the regional area is anticipated to undergo SEQRA review and comply with applicable and enforceable state laws, regulations, guidance and policies regarding environmental justice.

Environmental Justice Comment 11:

A commenter stated that the “Environmental Justice” section has been removed as an environmental impact category in the DEIS.

Response: The comment does not accurately reflect the FEIS. FEIS Section 3.16 provides an assessment of the Preferred Action and No Action Alternatives’ potential to result in effects on DACs and minority or low-income communities within the study area, in accordance with New York State laws, regulations, guidance and policies. This section was also provided in the DEIS.

Environmental Justice Comment 12:

The DEIS does not ensure low-income communities will have meaningful access to workforce training and employment at the Micron facility, including transportation to the facility.

Response: See Response to Socioeconomic Comment 39, for discussion of training. See Responses to Socioeconomic Comments 4 and 8, for discussion of the hiring of local employees.

See Responses to Transportation Comments 17 and 18. Once operations at the site begin, Micron’s intent is to provide transportation services bringing individuals to Micron and surrounding supporting businesses.

Environmental Justice Comment 13:

Micron should address housing displacement risks for marginalized and low-income communities.

Response: See Response to Socioeconomic Comment 19.

Environmental Justice Comment 14:

The DEIS fails to assess the impacts of Connected Actions on environmental justice communities.

Response: See Response to Environmental Justice Comment 1. FEIS Section 3.16.3.2 assesses the impacts of both the Proposed Project and the Connected Actions on identified low-income and minority communities and DACs within the study area (within a 5-mile radius of the Proposed Action and 1/2 mile of the Connected Actions). See Response to Environmental Justice Comment 1. Table 3.16-2 summarizes the data provided in Appendix R-1 and provides a list of the DACs within the study area, along with their burdens and vulnerabilities at or above the 80th percentile compared to the rest of the tracts in the state. Figures 3.16–3, 4, and 5 depict the DACs and Minority or Low-Income Communities Near the Connected Actions. Section 3.16.3.2 directly addresses the construction and operational impacts to identified DACs or low-income and minority communities near the Connected Actions and whether the proposed action would cause or increase a disproportionate pollution burden on those communities. As stated in that section, “[b]ased on a review of the other technical resource analyses included in Chapter 3 of this EIS, it can be reasonably concluded that many of the DACs and minority or low-income communities within the

study area would be unaffected by the Preferred Action Alternative (aside from growth inducing effects, which are discussed qualitatively under “Growth Inducing Effects,” below).”

Environmental Justice Comment 15:

Micron should work with the appropriate government agency to establish an alternative Environmental Justice screening tool based on USEPA's screening tool that has been eliminated. This new screening tool can then be applied in the future to the facility.

Response: The creation or implementation of alternative screening tools is outside the scope of the FEIS. The environmental justice analysis presented in the FEIS relies on established methodologies and coordination with relevant government agencies and stakeholders to support ongoing consideration of environmental justice impacts, as appropriate. See FEIS Section 3.16.

Environmental Justice Comment 16:

The commenter stated that there is a need for oversight and concrete commitments from Micron that potential adverse effects to environmental justice communities must not unduly impact these communities even if the impact is not disproportionate.

Response: Micron will be required to implement all BMPs and mitigation measures detailed in the FEIS as well as comply with all applicable permit conditions and approvals and applicable federal, state and local laws. The lead agencies and permitting authorities will oversee these requirements. See also Response to Environmental Justice Comment 1.

Environmental Justice Comment 17:

The commenter requested direct and equitable allocation of Green CHIPS Community Investment Fund monies to DACs and low-income/minority communities, as well as transparency in the allocation of these funds.

Response: See Response to Socioeconomic Comment 4, for discussion of the Green CHIPS CIF. The Green CHIPS Community Investment Fund is administered by ESD and Micron and is designed to support projects that provide community benefits, including environmental, educational, and economic programs. See FEIS Appendix R-2. Decisions regarding the allocation of these funds, including criteria for transparency and equity, are determined and implemented by ESD and Micron in accordance with State guidelines and oversight procedures.

Environmental Justice Comment 18:

The commenter requested equitable support for all emergency services, including those located in DACs and low-income/minority communities.

Response: See Response to Community Facilities Comment 1, discussing impacts to local emergency services, as well as mitigation measures for impacts to fire services from induced growth. The Proposed Project is not expected to cause or increase a disproportionate pollution

burden on DACs or minority or low-income communities related to the availability of police, fire or healthcare facilities services. See FEIS Section 3.16.3.2; see also Sections 3.14.3.2 and 3.14.4.

Environmental Justice Comment 19:

One possible location for handling hazardous waste is an Overburdened Community under New Jersey law and is considered an environmental justice community.

Response: As explained in FEIS Section 3.8, for any hazardous waste generated, permitted private hazardous waste haulers would collect hazardous waste and bring it to facilities authorized by NYSDEC or analogous out-of-state regulatory agencies for disposal in accordance with RCRA regulations. The exact location of any sludge disposal location is currently uncertain given that operations are not expected for many years. Notwithstanding, the transport of all hazardous waste would be performed by permitted hazardous waste haulers and disposal of all hazardous wastes would occur at a RCRA-permitting treatment, storage, or disposal facility such that no adverse effects to the environment or surrounding communities are anticipated.

Environmental Justice Comment 20:

An environmental justice analysis should be conducted for the sludge disposal locations.

Response: See Response to Environmental Justice Comment 19. FEIS Section 3.8 explains that non-hazardous sludge from on-site wastewater treatment would be sent to a beneficial use vendor or recycled. See also FEIS Table 3.8-5.

Environmental Justice Comment 21:

Will there be environmental justice impacts within the Town of Dewitt? Include potential environmental justice impacts related to flight paths, air pollution, traffic, housing, from the new traffic patterns, and other.

Response: The Town of Dewitt is outside the study area for evaluating potential environmental impacts that was defined in the Final Scope. The study area was based on the determination that the potential for adverse effects from construction and operation of the Preferred Action Alternative on low-income and minority communities, as well as DACs, are expected to be limited to within an approximately 5-mile radius around the Proposed Project sites, and a ½ mile of the Connected Actions.

Notwithstanding, no significant impacts on DACs or low-income and minority communities would be anticipated in the Town of Dewitt. Even within the study area, the Preferred Action Alternative would not cause or increase a disproportionate burden from construction or operation of the Proposed Project or Connected Actions. Similarly, in the low-income and minority communities and DACs identified within the study area, the Preferred Action Alternative would not cause or increase a disproportionate burden within those communities, except a potential temporary adverse effect on housing and rent pricing. Instead, the Preferred Action Alternative would produce beneficial effects for the local and regional communities, including identified DACs, by generating thousands of new jobs both on- and off-site through business-to-business supply chain services,

stimulating local and regional development through induced residential and worker spending, generating additional tax revenues and, over the 20-year term of the Green CHIPS Community Investment Fund (CIF), by investing \$500 million in local and regional initiatives that advance identified community needs. See FEIS 3.16.3.3.

4.0 Cumulative Impacts

Cumulative Impacts Comment 1:

Cumulative impacts and Induced Growth from the Proposed Project are not adequately assessed. These impacts are simplistically dismissed as short term or as being worked out with time.

Response: The FEIS evaluates the reasonably foreseeable indirect (induced growth) and cumulative impacts of the Proposed Project. Each resource area discusses impacts associated with induced growth while Chapter 4 of the FEIS analyzes the cumulative effects of the Proposed Project and Connected Actions together with other ongoing and reasonably foreseeable future actions within the local and regional areas. Certain impacts will be short-term by their very nature while others will change over the 16-year construction timeline, which gives time for the potential adverse impacts to be avoided or mitigated. For example, as discussed in FEIS Section 4.3.14, the anticipated increase in demand for community services will ramp up as each fab is constructed and becomes operational. This ramp up period will allow communities to prepare and secure any necessary additional revenue through increases in tax revenue.

Cumulative Impacts Comment 2:

It is unclear whether the entire growth induced effects of population increases are being considered as cumulative in the cumulative effects analysis.

Response: The FEIS utilized estimates of cumulative household growth at the town and county levels based on SMTC growth projections for the Syracuse Metropolitan Planning Area (MPA) which are official forecasts prepared by the regional planning agency using established methodologies. These forecasts, which are the standard data sources required for environmental review and provide a consistent basis for evaluating potential impacts, were used to assess induced growth effects on resources throughout FEIS Chapter 3 (see induced growth discussion of each resource) and FEIS Chapter 4 (Cumulative Impacts) where relevant.

Cumulative Impacts Comment 3:

The DEIS fails to assess cumulative impacts of PFAs, industrial greenhouse gases and extremely hazardous substances in the cumulative effects analysis. The project is expected to attract related activities, including research and development, chemical suppliers and competitors and these other facilities may release hazardous substances to the environment, including the County wastewater system. The DEIS should analyze and mitigate for cumulative impacts for hazardous substance use, storage and release from all sources.

Response: Cumulative impacts are assessed in FEIS Chapter 4 for actions that are ongoing and reasonably foreseeable to occur and are based on available and relevant information.

Specific potential PFAS uses and releases from various commercial and residential uses cannot be known given the ubiquitous nature of PFAS and are not reasonably determinable at this time. Notwithstanding, other future projects will be required to comply with applicable wastewater discharge limits and requirements as well as all applicable laws and regulations regarding the use, storage, disposal and emissions of PFAS and chemical compounds. See also FEIS Appendix L-1.

Cumulative Impacts Comment 4:

Those projects that are listed in Table 4.2-1 are considered as contributing to cumulative effects, but certainly there will be cumulative effects of the entire growth induced housing. The expanded population with related needs for transportation and commercial purposes are growth induced effects as well as cumulative. It should be made clear whether or not the cumulative impacts of greenhouse gas emissions from the induced households have been included in the cumulative impacts section.

Response: Impacts associated with induced growth are assessed in each resource area section of the FEIS. Chapter 4 then evaluates the cumulative impacts of the projects identified in Table 4.2-1, the Proposed Project and induced growth. As a result, the FEIS does consider the induced growth effects and cumulative effects for all resources areas, including housing, transportation and greenhouse gas emissions. See, e.g., FEIS Section 3.7.5; FEIS Section 4.3.7.

Cumulative Impacts Comment 5:

One specific area of confusion is in section 4.3.7.2 mobile source greenhouse gas emissions; here the statement is made that mobile source greenhouse gas emissions for the preferred action alternative which includes induced growth will result in higher mobile source greenhouse gas emissions compared to the no action alternative. But it is unclear if those greenhouse gases only include transportation related impacts, or do they include stationary impacts of housing for the growing population.

Response: See Response to Cumulative Impacts Comment 4.

Cumulative Impacts Comment 6:

Micron should assess the cumulative impacts of PFAS use and discharge from the Proposed Project with the broader contamination of PFAs within the region. PFAs already contaminate multiple sites within the vicinity of the project, which increased potential for cumulative exposure. The DEIS never evaluated the cumulative PFAs impacts from this project and other development likely to be undertaken as a result of the project, which violates SEQRA.

Response: See Response to Cumulative Impacts Comment 3 and FEIS Appendix L-1, addressing cumulative PFAS impacts.

Cumulative Impacts Comment 7:

SEQRA requires OCIDA to evaluate the cumulative effects of nearly 50 ongoing or reasonably foreseeable actions, including apartment units and homes, new commercial, retail and office space development, and industrial park on a 105-acre site owned by OCIDA.

Response: FEIS Chapter 4.0 Cumulative Effects, Table 4.2-1 identifies the present and reasonably foreseeable actions, in the immediate vicinity of the Proposed Project, and Table 4.2-1 identifies present and reasonably foreseeable actions in the five-county area, that have bearing on the potential impacts of the Preferred Action Alternative. The actions identified include developments such as apartments, homes, commercial, retail and industrial developments, as well as the White Pine Science & Technology Park, which is the 105-acre site referenced by the commenter.

Cumulative Impacts Comment 8:

OCIDA should conduct an economic impact analysis of the cumulative impacts of all the businesses that will likely come to the region as a result because of the Proposed Project.

Response: See Response to Cumulative Impacts Comment 1. While additional businesses may choose to locate in the region because of the Proposed Project, conducting a separate economic impact analysis for all potential future businesses would be speculative, and is not required. Notwithstanding, the FEIS considered the 2022 REMI Study. The REMI Study analyzed the economic and fiscal impact of the Proposed Project at the state and local levels, specifically including how the capital expenditures, facility operations, and contractors would affect employment, economic output, Gross Domestic Product (GDP), disposable personal income, state government revenue, and local government revenue for New York and the Central New York model region in which Onondaga County is located.

Cumulative Impacts Comment 9:

There should be a thorough reassessment of the cumulative impacts on environmental justice communities.

Response: See Response to Environmental Justice Comment 10. Section 4.3.16 evaluated the potential for cumulative impacts on DACs and low-income and minority communities within the study area. As detailed there, none of the projects identified in Table 4.2-1 would be located in a low-income or minority community or DAC. Notwithstanding, the FEIS acknowledges that certain reasonably foreseeable housing, retail commercial, industrial, roadway improvement, transit improvement, regional trail network improvement, and infrastructure improvement projects may be located near a low-income or minority community or DAC and therefore have the potential to adversely affect it. The exact impact of certain impacts would be dependent on the nature and extent of ultimate development. However, many of the projects identified in FEIS Table 4.2-1 would have anticipated benefits for DACs and low-income and minority communities within the study area.

Cumulative Impacts Comment 10:

The cumulative effects review needs more details, for instance the impacts upon broadband, and floodplains and the potential for impacts from nearby material suppliers that may forgo closure because of the potential to supply materials to the Proposed Project, e.g., Lehigh Cement Company.

Response: The FEIS provides a comprehensive evaluation of cumulative impacts across all relevant resource areas, addressing potential interactions between the Proposed Action and other past, present, and reasonably foreseeable future actions. The comment proposes evaluation of impacts that are not reasonably foreseeable.

Cumulative Impacts Comment 11:

A commenter expressed interest in knowing what other businesses and/or developments have been announced since the announcement of Micron, and other downstream economic impacts.

Response: A list of current and reasonably foreseeable future actions in the local and regional project area, which have bearing on the impacts of the Preferred Action Alternative, can be found in FEIS Table 4.2-1 and Table 4.2-2.

5.0 Public Review**Public Review Comment 1:**

Concern was raised that many members of the community have difficulty in accessing the documents or have difficulty with or are unable to provide comment. There is a technological barrier or lack of understanding of the technology to provide meaningful comment.

Response: The DEIS was made available to the public in multiple formats. Electronic versions were available on OCIDA's and CPO's website, and through links on Micron's website. In addition to the electronic versions, paper copies of the complete DEIS, with appendices, were available for public review at OCIDA's offices. Paper copies were also available for review at both the Town of Clay and Town of Cicero municipal offices, as well as the Onondaga County Public Library, in the main branch at 447 South Salina Street. Computer access was not needed to review the document. In addition, computer access was not needed to participate in the comment process. In addition to email, comments were accepted at the OCIDA mailing address and in-person. Some commenters participated by submitting letters and postcards. Technology was not a bar to meaningful public participation.

Public Review Comment 2:

General concerns were raised that the public input will not influence final project decisions, or that the project is being pushed through the review process, and the outcome is predetermined or assumed. OCIDA is rushing the process and limiting input from the public. You're fast-tracking the largest industrial project in New York history with barely enough time to read the footnotes, let alone 20,000 pages of appendices. If you extend the comment period on the DEIS to 120 days and allow more public hearings for the public to comment on the plan, you will see that the public does not want Micron here or at least requires accommodations to be met before Micron's implementation.

Response: The environmental review of the Proposed Project has not been rushed. The outcome is not predetermined, and all public input will be considered by the lead agencies.

The environmental review has complied with the procedural requirements of NEPA and SEQRA. An EIS was required for the Proposed Project. Public scoping was conducted, during which time the public was invited to identify issues that should be addressed during development of the EIS. The lead agencies then worked closely with Micron, as well as the NEPA participating agencies and SEQRA involved agencies, to prepare a comprehensive DEIS. The public was then given 47 days to submit written comment, which exceeds that required by SEQRA. Three public hearing sessions were also held. See Response to Public Review Comment 4.

SEQRA regulations establish the process to consider environmental impacts early in the planning stages of actions that are directly undertaken, funded, or approved by local, regional, and state agencies. On July 20, 2023, OCIDA passed a resolution at a regular meeting designating itself as Lead Agency under SEQRA and classifying the proposed action as a Type 1 action for purposes of a coordinated SEQRA review, commencing the current SEQRA process. Over the course of the last two years, OCIDA has closely evaluated the potential significant environmental impacts of the Proposed Project and Connected Actions, providing the regulatorily required opportunities for public review and comment.

Further, prior to this review, OCIDA conducted multiple environmental reviews under SEQRA for the WPCP location, including the most recent review outlined in the 2021 Final Supplemental Generic Environmental Impact Statement where OCIDA studied the potential impacts of a semiconductor facility at the WPCP site. As such, the reasonably foreseeable environmental impacts of a semiconductor manufacturing facility at the WPCP location have been studied numerous times under SEQRA, and review of such impacts has not been rushed or subject to hasty decision-making. Public comments continue to be considered in this review, as well as previous SEQRA reviews.

Public Review Comment 3:

Commenters raised concerns that the 45-day comment period was inadequate to review the DEIS and provide meaningful comment. Commenters requested extension of the public comment period, some suggesting a 120-day review period or October 25, 2025. Some commenters referenced the size or number of pages in the DEIS and the Appendix to the DEIS, which must be read and understood. Commenters also mentioned that many

people are on vacation during this time of the year, or had other distractions, or are out of town, which further supports a request for extension of the comment period. The agencies have been working on the DEIS for over two years. Cutting the review process short disregards the public's right and responsibility to give informed input on something that will affect their future and future generations. The shortened review times have limited the public's participation.

Response: The lead agencies conclude that the public has had a meaningful and reasonable opportunity to comment on the Proposed Project. *See Jackson v. New York State Urban Dev. Corp.*, 67 N.Y.2d 400 (N.Y. 1986).

The DEIS was released for public comment on June 25, 2025, by OCIDA and June 27, 2025, by CPO, and the comment period closed on August 11, 2025. This resulted in a 47-day comment period during which the lead agencies held three public hearings over the course of one day, July 24, 2025. The 47 days provided exceeds the NEPA 45-day minimum comment period and the SEQRA 30-day minimum comment period.

During development of the DEIS, the lead agencies met and communicated with NEPA participating and coordinating agencies (including, but not limited to, the USEPA and U.S. Army Corps of Engineers) and other SEQRA involved and interested agencies (including, but not limited to, NYSDEC and NYDOT) to ensure that all reasonably foreseeable significant environmental impacts were identified and fully evaluated in the DEIS.

Despite comments that the DEIS was 20,000 pages, it was 719 pages, more than half of which were figures, maps, and tables. The majority of the 20,000 pages were appendices to the DEIS that include raw data supporting the DEIS as well as publicly available documents (e.g., Final SEQRA Scope) and permitting documents (e.g., air permit application, wetlands mitigation plan). Appendix M, the Traffic Mitigation Study, alone represents thousands of pages of raw data. The appendices also provide additional details on the methodology used to analyze impacts in the DEIS as well as existing conditions.

To date, the Proposed Project has been subject to extensive public scrutiny and will continue to be subject to additional public scrutiny and comment as local, state, and federal permits and approvals are processed for the Proposed Project. First, both OCIDA and CPO conducted public scoping. OCIDA released a Draft Scope for public comment on September 20, 2023. The comment period for the scoping process was extended beyond the minimum required 30 days from September 20, 2023, to October 31, 2023. During this period, OCIDA held a public scoping meeting on October 11, 2023, to obtain input from the public. *See FEIS, Appendix A-2.* Thereafter, a NEPA scoping period was held from March 5 to April 5, 2024, during which time a NEPA public scoping meeting was held on March 19, 2024. *See FEIS Appendix A-3.* The U.S. Army Corps of Engineers twice sought public comment on the Clean Water Act Section 404 applications submitted by Micron and the New York State Public Service Commission also had a separate comment period and hearing as part of National Grid's Article VII application. NYSDEC also conducted its own public comment period for Freshwater Wetlands, Incidental Take, and 401 Water Quality Certification applications, and will do so for the required air permit for the Proposed Project as will the Town of Clay for purposes of site plan approval.

This also is not the first time that the public has been given the opportunity to comment on development at the WPCP. OCIDA previously evaluated the siting of a semiconductor manufacturing facility at the WPCP as part of the 2021 Supplemental Generic Environmental Impact Statement (SGEIS). As part of that SEQRA review, OCIDA provided the public with 36 days to comment on the Draft SGEIS and also held a public comment hearing where everyone who registered or asked to speak was given the opportunity to submit a verbal comment.

Public Review Comment 4:

Commenters requested additional public hearings to allow more public input. Some commenters suggested conducting 5 public hearings.

Response: See Response to Public Review Comment 3. A public hearing is not required under NEPA or SEQRA. Notwithstanding, based upon the degree of interest in the Proposed Project and identification of significant adverse environmental impacts, the lead agencies determined that it was appropriate to conduct public hearings concerning the Proposed Project. Three public hearing sessions were held by the lead agencies to allow public input.

On July 24, 2025, three public hearing sessions were held over the course of the day at Liverpool High School, located in the Town of Clay. At each session, every person who wished to speak was given the opportunity to do so, with some individuals speaking more than once.

Public Review Comment 5:

Other commenters indicated it would be helpful to have public sessions to present the findings of the EIS and explain what the project means.

Response: See Response to Public Review Comment 4. NEPA and SEQRA do not require public sessions. The FEIS fully describes the Proposed Project and Connected Actions and includes both an executive summary as well as a summary of impacts to help facilitate the public's understanding of the action.

Public Review Comment 6:

The size and volume of the DEIS was a technique to distract review and comment on the DEIS. Micron and its enablers do not want transparency and we the public must just accept it is 'for our own good' This shows that you really don't care what local citizens have to say about something that will affect their homes and lives.

Response: The lead agencies considered the public and local citizen's concerns. The DEIS was approximately 719 pages and included a number of additional appendices that provided greater technical detail on the Proposed Project and the anticipated environmental impacts. The size was not meant to distract but rather to educate the public about the project, its potential environmental impacts, and the mitigation being proposed to minimize those impacts.

Public Review Comment 7:

Micron should commit to continued public review and input throughout the life of the Project.

Response: Micron and New York State have made strong commitments to the community, including the creation of a Community Engagement Committee. The Committee continues to meet regularly and engage the public and will continue to do so. See also Response to Empire State Development Comment 3; Nation Comment 35.

Public Review Comment 8:

The DEIS was noted to be “most exhaustive environmental analyses ever considered for a project in New York,” validating the multi-year extensive expert review and significant public input, including open houses and public hearings, our community’s extensive planning.

Response: Comment noted.

Public Review Comment 9:

Onondaga County held the DEIS for three months and that violates public notice laws—it should have been available to the public.

Response: No public notice laws were violated. The DEIS was released for public comment once it was determined to be complete by OCIDA. No prior version of the DEIS was required to be released to the public.

Public Review Comment 10:

The DEIS materials should have been provided in the Spanish language.

Response: Neither NEPA nor SEQRA require environmental documents to be translated. Based on federal guidance, translation of environmental documents is generally suggested when a substantial portion of the affected community would otherwise be excluded from meaningful participation.

As shown in Section 3.15.2.1 and Appendix Q-2.1 of the FEIS, the local study area has a population of an estimated 91,301 persons (USCB, American Community Survey 2023). FEIS Appendix R-1, Table R-3 provides the estimated number of persons (2,265) reported to have limited English proficiency (LEP). This equates to approximately 2.50% LEP population within the study area. Because the Spanish-speaking LEP population represents a very small percentage of the study area’s overall population and is not concentrated within the Proposed Project area, the DEIS was not translated into Spanish or any other language.

Public Review Comment 11:

Commenters expressed appreciation of the transparency and detail demonstrated in the DEIS. Commenters expressed appreciation for the opportunity to comment on the DEIS.

Response: Comment noted.

Public Review Comment 12:

There has been no response to the petition signed by over 1,500 residents of the region asking for an extended comment period.

Response: See Response to Public Review Comment 3.

Public Review Comment 13:

DEIS is thorough and provides sufficient detail to assess the project for decision-making. The commenter noted that he/she did not identify any fatal flaws or significant gaps.

Response: Comment noted.

6.0 General Comments

General Comments 1:

Commenter stated that the DEIS shows that Central New York is one of, if not the, best places in the world for critical, leading-edge semiconductor manufacturing.

Response: Comment noted.

General Comments 2:

Central New York will benefit from needed investments in regional infrastructure including water and wastewater systems, the electric grid and much-needed road and highway investments in Onondaga County's northern suburbs.

Response: Comment noted.

General Comments 3:

NY SMART I-Corridor noted that building the Micron Project in Onondaga County is both an economic opportunity and an environmentally responsible choice given New York State's strong state environmental standards.

Response: Comment noted.

General Comments 4:

Commenter noted that the current DEIS does not satisfy SEQRA’s “hard look” standard, nor does it allow the public and reviewing agencies to fully assess the environmental, social, and economic impacts of the project. Multiple commenters request that a Supplemental Environmental Impact Statement (SEIS) be prepared to correct the deficiencies in the DEIS.

Response: The DEIS provided the public and involved agencies with the necessary information to evaluate project impacts, alternatives, and mitigation measures. Under SEQRA, specifically 6 NYCRR § 617.9, an EIS must assemble relevant and material facts upon which an agency’s decision is to be made and must analyze the significant adverse impacts and evaluate all reasonable alternatives. The DEIS met those requirements and provided the public, and involved agencies, with the necessary information to evaluate project impacts, alternatives, and mitigation measures.

A lead agency has the discretion to require a supplemental EIS in limited circumstances. Here, the FEIS does include additional detail on certain topics in response to public and agency comments. However, the lead agencies find there is no need to prepare a supplemental EIS given that all reasonably foreseeable significant adverse environmental effects have been adequately addressed.

General Comments 5:

NY SMART I-Corridor noted that although the proposed project carries environmental impacts that must be carefully managed, it also presents significant opportunities, including thousands of well-paying jobs, strengthened national security, and long-term economic growth that will establish Upstate New York as a national leader in this critical industry.

Response: Comment noted.

General Comments 6:

NY SMART I-Corridor commented that Micron’s impact will be substantial: up to 9,000 direct jobs, more than 50,000 additional regional jobs, and \$100 billion in private investment over the next two decades. With thoughtful mitigation strategies in place, these economic benefits can be achieved in an environmentally responsible way.

Response: Comment noted.

General Comments 7:

If the project is a good fit for the community, then almost everyone will be supportive. If it is not, it should be modified, or in extreme cases, should not be built. Orange County is already saddled with a huge gas power plant that was never properly permitted but was built anyway. Once something is built, it is very hard to undo the momentum, so despite ongoing hardship and protest, everyday residents are forced to live with it.

Response: Comment noted.

General Comments 8:

The final EIS should ask that the plan include ways that local experts can voluntarily suggest potential solutions that allow the potential for creative best practice, practical and creative ideas, based on local conditions.

Response: The FEIS process follows specific regulatory requirements and methodologies that guide how alternatives and mitigation measures are evaluated. During development of the FEIS, technical experts at the federal and state level were engaged to review and provide comments on the DEIS. In addition, the DEIS was subject to a public comment period during which the public was invited to comment and provide recommendations. There are also separate permitting processes that are occurring where the public either has or will be able to provide comments. See also Responses to Public Review Comments 2 and 3.

General Comments 9:

Executive Director for New York State's first ever regional STEAM High School in the Syracuse City School District, expressed sincere appreciation for Micron's unwavering commitment to education in the region, noting that Micron has been a wonderful partner in helping us get this transformative project off the ground.

Response: Comment noted.

General Comments 10:

President of Onondaga Community College detailed the college's experience with Micron Technology and how it is having a positive impact on the lives of students of all ages at Onondaga Community College.

Response: Comment noted.

General Comments 11:

Executive Director of the Central New York Regional Planning and Development Board commented on the Micron Project's consistency with community planning and noted that the area has the infrastructure, people, education, resources, healthcare, public safety, environmental resources, and public commitment to make the Micron Project a success.

Response: Comment noted.

General Comments 12:

A representative of the Onondaga and Cortland-Madison BOCES noted that Micron has been a fantastic partner over the last couple of years and that the company has taken the time to communicate with O.C.M. BOCES about its workforce development needs. The representative further stated that it is encouraging work with Micron, which is willing to

be a learner and to help B.O.C.E.S. know the skills needed to help workers have what they need know to be successful.

Response: Comment noted.

General Comments 13:

The C.E.O. of Center State, a Regional Chamber of Commerce and Economic Development Organization in Central New York, discussed the hope surrounding the Micron Project, noting recent meetings focused on individuals, mostly from minority women owned businesses, who are hoping to grow their businesses alongside the Micron Project and are excited for the project. He also commented on the large number of business members and nonprofit members that believe that the area is well suited for the Micron Project.

Response: Commented noted.

General Comments 14:

Commenters indicated that the project prioritizes private or economic gain over environmental and community health.

Response: See Response to Purpose and Need Comment 2. SEQRA regulations require that, for an involved agency to approve an action, the agency must be able to conclude that the action, including any conditions attached to its approval, avoids or minimizes anticipated adverse impacts to the maximum extent practicable, or that public need and benefit outweigh the identified environmental impact.

General Comments 15:

The SEQR process contemplates that new information, new opportunities for improvements and new environmental issues will develop even before the first phase is built. Moreover, the duration of the construction of the overall project is 16 years. Fab 3 and 4 will be constructed many years in the future. It should be a condition of approval that a SEIS be drafted and reviewed when the Fab 3 and 4 project is under design. It is inevitable that changes in the industry, the communities affected, climate and environmental needs, impacts, and opportunities will have changed over that time. SEQR requires a new hard look at the Project when the new phase is under review. The SEQR review that is embodied in the DEIS is not and may not legally be a 'one and done' process. In fact, while avoidance of segmentation requires the full build out be considered now, the impacts of the second phase of the project are in the nature of a Generic EIS, as they are speculative and uncertain. Even more importantly, environmental concerns, requirements and opportunities will certainly change and evolve in the next decade, all of which necessitates a Supplemental DEIS. (617.9 (a) (7)).

Response: It would be speculative to determine whether a supplemental EIS would be required for construction of Fabs 3 and 4 at a later date. The requirements for when a supplemental EIS must be prepared under SEQRA will dictate if a supplemental EIS is needed in the future.

General Comments 16:

The Draft EIS defines the Preferred Action as the construction of four fabrication facilities. However, the CHIPS funding for the project actually only pertains to the construction and outfitting of two fabs.

Response: Although the Department of Commerce's final award to Micron only includes direct funding to support Micron's construction and operation of Fabs 1 and 2, the Department of Commerce based its award decision on Micron's proposal to establish a full four-fab cluster by 2041 (which would ramp up to full operational capacity by 2045). See FEIS Section 1.1.1. The FEIS therefore considered the reasonably foreseeable impacts from full build-out of the Proposed Project, including all four fabs.

General Comments 17:

The commenter asked that attention be paid to opinions that were submitted to the local newspaper, indicating that those opinions were thorough.

Response: The commenter did not attach the opinions that were submitted to the newspaper or otherwise identify or specify which opinions the commenter requested the lead agencies consider. Without knowing which opinions the commenter was referring to, the lead agencies were unable to consider these in response to this comment. All comments properly submitted during the public comment period on the DEIS, including at the three public hearing sessions, were considered.

General Comments 18:

The commenter requested clarity on whether his property or residence would be impacted by construction or phases, including road expansion, utility work or related components, and would like to be informed of disruptions or risks to the property and quality of life.

Response: The lead agencies will require that Micron provide notice to the affected landowner.

General Comments 19:

One commenter requested a paper copy of the DEIS.

Response: The DEIS was available in hard copy at OCIDA as well as at both the Town of Clay and Town of Cicero municipal offices and the Onondaga County Public Library.

General Comments 20:

New technologies and new information are going to occur and there should be ongoing review of the Project, and an adaptive management program with active public involvement. Micron should also commit to incremental build and assessments to ensure that commitments are being fulfilled.

Response: The Proposed Project will be subject to ongoing technical review as permit renewals are required. Further, to the extent new information and subsequent agency action may necessitate further environmental review, such review would be undertaken.

General Comments 21:

Concern was expressed regarding whether there is adequate numbers of qualified personnel and rail-accessible aggregate available to handle the construction schedule.

Response: Micron has selected Railworks, a leading provider of rail infrastructure construction and maintenance services across North America, serving transit authorities, freight railroads, and industrial clients. Railworks is headquartered in New York and forecasts that over 80% of the qualified personnel for the construction of the spur can be sourced locally and the remaining will be sourced regionally. Aggregate contracts have been issued to suppliers for proposal and all are indicating they will be able to source the amount needed on the forecasted schedule.

General Comments 22:

Micron should carefully choose the companies they use for construction.

Response: Micron has a robust, structured and competitive process for selecting construction companies. This process includes defined roles, change control, and continuous improvement cycles to ensure consistent value delivery.

General Comments 23:

Commenter concerned that most if not all the jobs at Micron will go to machines.

Response: The concern is misplaced. The Proposed Project is estimated to generate over 4,000 on-site construction jobs over the approximately 16-year construction period, and over 9,000 permanent on-site operational jobs. It is also anticipated to generate demand for nearly 9,500 jobs at regional supply chain businesses and approximately 23,500 jobs at regional governments, institutions, and businesses supporting the growth in regional household spending (approximately 33,000 off-site jobs in total by 2045). See FEIS Section 3.15.3.2.

General Comments 24:

Commenters described the investment that Micron has made in education in the local community now and into the future.

Response: Comment noted.

General Comments 25:

Micron should commit to third-party monitoring of air, water and noise pollution during the operation of the Project.

Response: There are numerous federal, state, and local entities permitting and monitoring Micron facilities during both the construction and operation of the Proposed Project. For example, regarding water monitoring, Micron's wastewater discharges will require a discharge permit issued by OCDWEP, and OCDWEP's discharges will require a State Pollutant Discharge Elimination System (SPDES) permit from NYSDEC. SPDES permits establish effluent limitations and monitoring requirements to ensure compliance with established limits. NYSDEC requires that wastewater samples be collected and then analyzed by independent, certified laboratories. The results are then reported to NYSDEC. See Response to Water Resources Comment 31; FEIS Section 3.4.4.2.

As for air monitoring, the Clean Air Act and New York state laws and regulations require USEPA monitoring, assessment and reporting of ambient air quality and compliance with the National Ambient Air Quality Standard (NAAQS). NYSDEC air permitting requirements include emissions reporting and certification to ensure compliance with permit thresholds and regulatory limits. Site specific monitoring, recordkeeping, and reporting requirements will also be included in an air Title V permit issued by NYSDEC and will require air emission monitoring reports and certifications to be submitted to NYSDEC to ensure compliance with permit and regulatory thresholds and limits. USEPA and NYSDEC maintain ongoing authority to monitor and ensure compliance with all air permit and applicable air quality requirements and compliance with the NAAQS, and deviations from permit requirements must be reported to NYSDEC. See Response to Air Quality Comment 12.

Regarding noise monitoring, the FEIS proposes a combination of operational best management practices (BMPs), noise monitoring, and adaptive noise mitigation measures, including both permanent and temporary sound barriers to reduce noise levels. See FEIS Section 3.12.6 and Response to Noise Comments 1 and 2. Micron also has committed to implementing continuing coordination with regulatory agencies to ensure that community concerns are addressed and that residents are protected throughout the development process.

General Comments 26:

Commenter requested information on whether lead pipes in the City of Syracuse will be replaced for the Project.

Response: Replacement of lead pipes in the City of Syracuse is not part of the Proposed Project.

General Comments 27:

Micron should go above and beyond what is required by law, or by just paying money into funds.

Response: Comment noted.

General Comments 28:

At other comparable Micron sites in the country, what are the PFAS levels in the air and water?

Response: The FEIS must analyze the reasonably foreseeable significant impacts of the Proposed Project, not to separate Micron or other facilities. The Proposed Project would be located in Clay, NY. Additional information concerning PFAS has been added to the FEIS as Appendix L-1. See also Responses to Water Resources Comments 33 and 34; Response to Air Resources Comments 7 and 13.

General Comments 29:

A commenter stated that investment should be made in the City of Syracuse, not just the suburbs.

Response: Comment noted.

General Comments 30:

A commenter requested information on who will pay for the cost of animal control needed for displaced animals.

Response: Animal control is not anticipated to be needed for any displaced animals. To the extent that the comment is concerned about displaced wildlife, see FEIS Section 3.4.

General Comments 31:

Concerns were raised that the Community Investment Fund is not binding nor sufficiently transparent, denying public oversight.

Response: Micron's funding for the Community Investment Fund (CIF) is a requirement of the NYS Green CHIPS program and, therefore, Micron must fund CIF-eligible projects to receive Green CHIPS incentives. As part of the Green CHIPS program and continued receipt of Green CHIPS funding, Micron is required to provide Empire State Development with annual reporting on CIF funding. This annual reporting will be available to the public. See Responses to Empire State Development Comments 1-5.

General Comments 32:

A commenter indicated that approvals for the fab development be contingent on robust, binding mitigation commitments with measurable objectives.

Response: Comment noted.

General Comment 33:

One commenter challenged, based on his experience as an architect, the acceptance of “unavoidable” environmental impacts in the DEIS, arguing that decades of advancements in sustainable design and construction offer practical alternatives that were overlooked and should be reconsidered for mitigation.

Response: NEPA, as does SEQRA, requires agencies to consider a “reasonable range of alternatives to the proposed action, including an analysis of any negative environmental impacts of not implementing the proposed action in the case of a no action alternative, that are technically and economically feasible, and meet the purpose and need of the proposal.” 42 U.S.C. 4332(C)(iii); see also 6 NYCRR 617.9(b)(5)(v). See FEIS Section 2.2. The FEIS meets those requirements. The FEIS also thoroughly contemplates mitigation measures. See, e.g., Section 3.1.4. Conclusory allegations that additional alternatives and mitigation measures were overlooked cannot be addressed.

General Comment 34:

Commenters stated general or enthusiastic support for the project, some noting the economic benefits for the towns, county and region, and positive impacts on employment.

Response: Comment noted.

General Comment 35:

The Micron project in Central New York leverages the region's talent and infrastructure building upon the thriving aerospace and defense industry. The success of local companies such as Lockheed Martin and Micron will enhance the U.S. defense industry and their presence will have a positive impact on the Central New York community, driving growth and expansion.

Response: Comments noted.

General Comment 36:

Some commenters expressed concern that the project was taking too long to permit and start construction.

Response: Comment noted.

General Comment 37:

Commenters expressed general opposition to the project, without identifying specific concerns regarding the project's impacts on environmental resources.

Response: Comments noted.

General Comment 38:

The commenter stated that they and others are not in support of a PILOT agreement with OCIDA and a hotel.

Response: Comment noted.

General Comment 39:

The commenter stated that the diversity of the panel at the public hearing did not instill optimism regarding the ability of the Project sponsors to appreciate and adequately address the needs and concerns of the diverse population of the local community.

Response: There were three separate sessions of the public comment hearing, and written comments were received by the lead agencies.

General Comment 40:

One commenter indicated opposition to the project based on both military strategy and national security reasons. The facility would be a target for aerial bombardment and long-range, missile attacks or it could be a target for a cyberattack, as it would be easy to cause a lot of damage to production and maybe even to the facility itself. The facility could be subject to purposeful sabotage.

Response: There is no reason to suspect that the Micron Campus would be a target. Access to the Micron Campus will be secure. Micron will have private security services on site during construction and operation as well as security fencing. Micron has a dedicated security team that works closely with local, state, and federal law enforcement agencies to identify and prevent physical and cyber security attacks.

General Comment 41:

Micron may purposefully abandon the project for financial reasons, such as to boost the price of stock, as it is a poor use of the company money.

Response: Comment noted. As a condition to accepting the CHIPS Award, Micron has agreed to a series of policy commitments and disbursement milestones that would further increase the value of the Proposed Project to U.S. national and economic security. Additionally, disbursement milestones are structured to incentivize continued commitment to the Proposed Project and to ensure that the Proposed Project manufactures commercial wafers within a target timeframe.

Further, CPO assesses that once one fab in NY is complete, Micron will be motivated to continue investing in additional fabs to reach the benefits of scale. This assessment is based on well-established benefits of economies of scale across the memory industry, as seen in similarly large fabs built in East Asia. The structure of the CHIPS award incentivizes the continued building of fabs in New York.

General Comment 42:

Commenter appreciates the proactive investment in environmental stewardship and enhancements, along with the clear commitment to sustainability, ecological restoration and responsible growth. The commenter worries that Micron is setting a mitigation bar too high for other development projects in the future.

Response: Comment noted.

General Comment 43:

Concerns regarding failure to adequately address PFAS could result in a claim under the Green Amendment of the New York State Constitution.

Response: The reasonably foreseeable significant adverse effects related to PFAS have been adequately addressed in the FEIS, including Appendix L-1.

General Comment 44:

What standard helps determine what is in the public interest.

Response: SEQRA requires agencies to evaluate reasonably foreseeable environmental impacts and social and economic impacts of a proposed project. NEPA requires federal agencies to consider the reasonably foreseeable environmental effects of their proposed actions. Neither law includes an express public interest determination. The lead agencies have thoroughly evaluated the reasonably foreseeable impacts of the proposed action and alternatives, as documented throughout the FEIS. Each agency will make a decision based on this information and what it believes best serves the public's interest. See also Response to Purpose and Need Comment 2.

General Comment 45:

Micron's investment goes far beyond jobs and buildings. It's about our community and our people's futures. For our region: economic revitalization, population growth, and a renewed position at the forefront of American innovation. For students: new internships, career paths, and hands-on learning. For faculty and staff: new collaboration opportunities, research expansion, and professional growth and development. Much like the Erie Canal once opened New York to the world and transformed its economic future, Micron's presence in our community has the potential to redefine what's possible for this region and for the nation.

Response: Comment noted.

General Comment 46:

The Micron project is highly desirable from a social and economic perspective.

Response: Comment noted.

General Comment 47:

Concerns were raised that the Proposed Project will not deliver the economic growth as promised or as projected. Economic growth is at the expense of displacing people and protecting resources. The Project puts profit ahead of protecting resources. The project will take years to complete, taking longer to achieve profit.

Response: The FEIS demonstrates that the Proposed Project will provide significant and beneficial economic and fiscal benefits both on the state and regional levels. The New York State Empire State Development (ESD) commissioned a September 29, 2022, report entitled, “Economic and Fiscal Impact of Establishing a Semiconductor Manufacturing Facility in Onondaga County, New York,” in which Regional Economic Models, Inc. (REMI) modeled the potential economic and fiscal impacts of the Proposed Project at the state and local levels over the period 2025-2055 (hereinafter the “REMI Study”). See FEIS, Appendix C-2. The REMI Study found strong positive economic and fiscal impacts that are driven largely by the highly productive and well-compensated Proposed Project employees who create significant supply chain demand and spend robustly in the local economy. Specifically, the key results of the REMI Study included:

1. The Proposed Project would create an average annual employment impact of 45,418 at the state level over the time period 2025-2055, with 39,975 of those jobs coming from the Central New York region.
2. For every direct company hire, there would be about 5.5 other jobs created in the state economy.
3. By 2055, the Proposed Project would create 50,911 jobs at the state level (44,943 of which would be based in Central New York), including 9,005 of the facility’s direct hires and 9,431 indirect and 32,474 induced jobs (indirect and induced 41,905).
4. The average annual total investment employment impact associated with the capital and other infrastructure spending (2025-2044) would be 11,871 (6,647 direct; 1,146 indirect; 4,079 induced). In terms of direct investment employment, construction related jobs would be over 84 percent (5,595) on average during the 2025-2044 timeframe.
5. The Proposed Project would grow the state economy significantly, adding an annual average of \$16.7 billion in real economic output and \$9.6 billion in real Gross Domestic Product (GDP) over the time period 2025-2055.
6. The Proposed Project would add an annual average of 59,575 in state population over the time period 2025-2055.
7. The Proposed Project would add an annual average of \$5.4 billion in real disposable personal income for New York residents over the time period 2025-2055.
8. The Proposed Project would generate an average annual increase of \$378.5 million in real state government revenue, for a present value (PV) of \$7.1 billion over 2025-2055 using a three percent discount rate, and a fiscal benefit-cost ratio of 2.0 relative to the PV of proposed real New York State incentives at a three percent discount rate.
9. The Proposed Project would generate an average annual increase of \$565.5 million in real revenue to local governments in New York State, for a PV of \$10.7 billion over 2025-2055 using a three percent discount rate. Most of these revenue gains would occur in Central New York region.

Thus, the REMI Study concluded that “[u]ltimately, these results point to substantial positive impacts on New York’s economy and budget, supported by productive and high-paying jobs and a fostering of further growth in the semiconductor manufacturing ecosystem in the state.” Further discussion of the REMI Study and the socioeconomic impacts of the Proposed Project are provided in Section 3.15 of the FEIS.

General Comment 48:

At a time when global supply chains are under pressure and national security is tied to technological independence, the Micron project positions NY as a national leader in semiconductor manufacturing.

Response: Comment noted.

General Comment 49:

Micron has the potential to create thousands of good-paying, advanced manufacturing jobs, establish our region as a hub for semiconductor manufacturing, and attract a robust network of supply chain companies. Beyond its economic impact, the Micron project will significantly strengthen national security and bolster U.S. competitiveness. The DEIS is a vital step to ensure that the project moves forward responsibly, balancing economic growth with community well-being.

Response: Comment noted.

General Comment 50:

Failure to properly assess alternatives means that the Micron project cannot be issued a Section 404 wetlands permit.

Response: The FEIS properly assesses alternatives. See Response to Project Description/Alternatives Comment 1. The USACE will determine whether to issue a Clean Water Acts Section 404 wetlands permit in accordance with applicable laws and regulations.

General Comment 51:

Suggestion was made that OCIDA and other agencies with approval authority issue conditional approval for clearing activities prior to final issuance of a full EIS, to facilitate minimal disturbance to impacted species and allow more time for review of other aspects of the DEIS.

Response: Tree clearing impacts cannot be conditionally approved before the EIS is complete.

General Comment 52:

Comment indicated that the EIS must be updated periodically to consider the environmental impacts as they change over the course of the 16-year construction schedule.

Response: The requirements of NEPA and SEQRA will dictate if and when any updates are necessary to the FEIS. See Response to Public Review Comment 4.

General Comment 53:

General concerns that Micron will leave the area or change its plans once tax breaks expire or based on the twenty-year timeframe if circumstances change.

Response: Micron's investment reflects a strong commitment to staying and growing in the area and intends to establish and sustain operations in the region over the coming decades.

General Comment 54:

A comment in support acknowledges that Micron does not have control over a number of impacts; however, the DEIS raises awareness as to what localities can do to improve infrastructure, economic growth, and housing development.

Response: Comment noted.

General Comment 55:

Commenters raised procedural concerns that the existing water withdraw permit covers only the first two fabs, but this public review period is for all four fabs.

Response: The existing water withdrawal permit pre-dates the Proposed Project and has no relation to any of the proposed fabs. A modified water withdrawal permit is being sought by OCWA. See FEIS Section 3.10.3.2. Notice of Complete Application for a modified water withdrawal permit was issued by NYSDEC July 25, 2025, and Notice was given to the Great Lakes Compact for comment July 29, 2025. This application, if approved, would manage water needs for the entire service area inclusive of the four fabs.

General Comment 56:

The DEIS fails to satisfy the legal standards of NEPA, SEQRA, the Clean Water Act, the Endangered Species Act, CLCPA, and EJ requirements. These deficiencies must be addressed through permit denials, supplemental review, or project cancellation.

Response: The FEIS satisfies SEQRA and NEPA. The agencies with jurisdiction over the remaining regulatory regimes will assess the Proposed Project's compliance based on the application materials before them.

General Comment 57:

Commenters sought additional information on usage of the proposed Rail Spur, asking what fuels are proposed and if any are non-fossil fuels.

Response: The Rail Spur Site, its construction, operation, and use, are fully described in Section 2.1.2. Locomotives will be operated and fueled by CSX. No on-site use or storage of fuels is anticipated at the Rail Spur Site. The conveyer will be electric.

General Comment 58:

Question about what costs will be born by taxpayers with respect to the Rail Spur and related infrastructure upgrades, and whether eminent domain will be exercised for any of the necessary land.

Response: FEIS Section 2.1.2.1 provides an overview of the Rail Spur Site. Micron proposes to construct the rail spur and associated conveyance facility on approximately 38 acres of land consisting of two contiguous parcels which Micron has already purchased. Eminent domain will not be used for the Rail Spur Site. The rail spur would be operated by an independent contractor pursuant to an agreement with Micron. It will not use taxpayer money.

General Comment 59:

What monitoring and reporting requirements does Micron have with regard to planned and unanticipated changes in design, configuration, and operation of the facilities over their construction, operation, and closure?

Response: Any changes in design, configuration, and operation of facilities over their construction and operation would be governed by the permits applicable to the changes, including, but not limited to, any wetlands permits, wastewater permits, air permits, site plan approval and building permits. Micron and the entities responsible for implementing the Connected Actions would continue to be required to comply with all applicable monitoring and reporting requirements established by federal, state, and local permitting authorities throughout construction and operation of facilities. To the extent any changes would require permit modification, the relevant entity would apply for such modification to the appropriate permitting authorities.

General Comment 60:

Commenter requested transparency and equity in allocation of the Green CHIPS Community Investment Fund. CPO and ESD should monitor Micron's compliance with the goals of the CHIPS Incentive Program and Green CHIPS Act.

Response: The Green CHIPS Community Investment Fund is administered by the New York State ESD and is designed to support projects that provide community benefits, including environmental, educational, and economic programs. Decisions regarding the allocation of these funds, including criteria for transparency and equity, are determined and implemented by ESD in accordance with State guidelines and oversight procedures.

As a condition to accepting the CHIPS Award, Micron has agreed to a series of policy commitments and disbursement milestones that would further increase the value of the Project to U.S. national and economic security. Additionally, disbursement milestones are structured to incentivize continued commitment to the Proposed Project and to ensure that the Proposed Project manufactures commercial wafers within a target timeframe.

General Comment 61:

Approval decisions should impose a requirement to establish baseline conditions in the local air, water and soil for all chemicals that foreseeably will be introduced to the environment by the Project.

Response: Required approvals will comply with all applicable requirements.

General Comment 62:

In addition to following the Green Chips legislation, it is the responsibility of New York to monitor and enforce its environmental laws and policies.

Response: Comment noted.

General Comment 63:

A commenter expressed interest in knowing what other businesses or developments have been announced since the announcement of Micron, and other downstream economic impacts.

Response: Comment noted. The request is outside the scope of the FEIS except to the extent noted in FEIS Chapter 4, Cumulative Effects.

Appendix A-6
Comment Matrix and Comments Received

Date	Name	Representing	AGENCY	1.1 Purpose & Need	2.0 Proposed Action & Alternatives	3.1 Land Use - Zoning	3.2 Geology-Soils-Topography	3.3 Water Resources	3.4 Biological Resources	3.5 Historic & Cultural	3.6 & 3.7 Air Quality-GHG-Climate Change	3.8 Solid waste-Hazardous Materials	3.9 Health & Human Safety	3.10 Utilities	3.11 Transportation	3.12 Noise-Vibration	3.13 Visual Effects - Community Character	3.14 Community Facilities, Open Space, Recreation	3.15 Socioeconomic	3.16 Environmental Justice	4.0 Cumulative Effects	5.0 Public Review - Procedural	6.0 General Comments (support & opposition)	Email	submitted via		
6/25/2025	Williams, Qiana																					X		qianaki@gmail.com	email		
6/26/2025	Doody, Paul																						X		pauldoody1978@gmail.com	email	
6/26/2025	Forsyth, Kelly													X									X		forsythkm0726@gmail.com	email	
6/26/2025	Graziano, Kim																						X		ksgraziano@gmail.com	email	
6/26/2025	Harte, Scott								X																scott.harte@gmail.com	email	
6/26/2025	Jagusah, MoAde																						X	X	mmjagusah@gmail.com	email	
6/26/2025	Rupp Pfalzgraf, Richard Webster (Email from Ashley Murphy)	Jobs to Move America																					X		webster@RuppPfalzgraf.com	email, FEDEX	
6/27/2025	Curtis, Jordan							X	X					X											jcurtisbbyberry@gmail.com	email	
6/27/2025	Shotz, Alyson							X															X		theobabka@gmail.com	email	
6/28/2025	mauw41																							X		mauw41@aol.com	email
6/29/2025	Doody, Paul																							X		pauldoody1978@gmail.com	email
6/30/2025	ackerperso@yaho																						X		ackerperso@yahoo.com	email	
6/30/2025	Barish, Judith	Chips Communities United																					X		info@chipscommunitiesunited.org	email	
6/30/2025	Carlisle, Betty																						X		spdoc2@gmail.com	email	
6/30/2025	Finneran, Mary													X									X		msfenn123@yahoo.com	email	
6/30/2025	Griola, David																						X		david.griola@gmail.com	email	
6/30/2025	Hayes, Regan																						X		reganhayes2018@gmail.com	email	
6/30/2025	Kellogg, Syd													X									X		kellogcd@leymoyno.edu	email	
6/30/2025	Lain, Martha																						X		martha.lain@gmail.com	email	
6/30/2025	Lewis, Maggie Shayne			X				X	X		X													X		maggie.shayne@gmail.com	email
6/30/2025	Lyons, Amanda																						X		amandalyons1124@gmail.com	email	
6/30/2025	McCoy, Mary																						X	X	rtoad21@aol.com	email	
6/30/2025	Peters, Paula							X			X			X											squirreigi457@yahoo.com	email	
6/30/2025	Ryden, Wendy																						X		Wendy.Ryden@liu.edu	email	
6/30/2025	wounds					X		X	X		X			X	X	X							X		woundsa@gmail	email	
6/30/2025	Waelder, Karen							X	X		X			X	X										karenrkw@hotmail.com	email	
6/30/2025	Waldron, Sue										X			X	X										susanleywaldron@yahoo.com	email	
6/30/2025	Williams, Chris																							X		yosemitechris@icloud.com	email
7/1/2025	Herrick, Elizabeth																						X		elzaraeh@gmail.com	email	
7/2/2025	Valentine, Jennifer							X																	faboo1028@gmail.com	email	
7/3/2025	Wilcox, Octavia	WowO President						X				X	X												octavia.wilcox@yahoo.com	email	
7/4/2025	Masiclat, Walter																						X		masiclat.walker@gmail.com	email	
7/4/2025	Thomas, Allison																						X		allison.thomas4297@gmail.com	email	
7/6/2025	Landless, Gavin										X														gavini@protonmail.ch	email	
7/7/2025	Carver, Alyah								X		X												X		carverlia@gmail.com	email	
7/7/2025	Casales, David																						X		david@agreeny.org	email	
7/7/2025	Falconer, Iben																						X		lben.Falconer@gmail.com	email	
7/7/2025	Jones, Jessica								X		X												X		jonesj5189@gmail.com	email	
7/7/2025	Kellogg, Syd								X		X			X		X							X		kellogcd@leymoyno.edu	email	
7/7/2025	Matlock, Issac							X	X						X						X		X		isaacm1231@gmail.com	email	
7/8/2025	Bass, Rachel																						X		rachel.o.bass@gmail.com	email	
7/8/2025	Cameron, Alexis (Powers)										X			X									X		alexis.cameron@gmail.com	email	
7/8/2025	Canright, Rebecca													X									X		rebeccagroovypeace@gmail.com	email	
7/8/2025	Frederick, Cynthia																						X		fredrick.cynthia@gmail.com	email	
7/8/2025	Giarusso, Kelly								X						X										henryskelly@yahoo.com	email	
7/8/2025	Rath, John																						X		jrfree59@gmail.com	email	
7/8/2025	wounds																						X		woundsa@gmail	email	
7/8/2025	Wilson, Sandy																						X		iamsammyam@yahoo.com	email	
7/9/2025	Hinkelman, Carol																						X		carolhroc@gmail.com	email	
7/10/2025	Holmquist, Ruta																						X		rutaholm@yahoo.com	email	
7/10/2025	Hopkins, Kirsten																						X		denimgirl@juno.com	Email	
7/10/2025	Peters, Robert																							X		sreppbob@yahoo.com	email
7/10/2025	Przepiora, John	GreeningUSA, Inc.																			X		X		john@greeningusa.org	emails	
7/11/2025	Fero, Judy							X			X		X										X		judyfero@twrny.rr.com	Email	
7/11/2025	Hughes, Don																						X		dhughes171@gmail.com	email	
7/11/2025	Kallander, Amy								X														X		akalland@syr.edu	email	
7/11/2025	Mera, Jose				X										X										jose.mera1016@gmail.com	email	
7/12/2025	Shanley Eva																						X		eshanley9@gmail.com	email	
7/12/2025	Slabowski, Jane																						X		Jane.Slabowski<jslabowski@aol.com>	email	
7/14/2025	Joseph Heath, Esq. Onondaga Nation	Onondaga Nation	X																				X				letter
7/14/2025	Kellogg, Syd								X					X	X	X								X			postcard
7/15/2025	Becker, Serena																						X		serenabecker@gmail.com	email	
7/15/2025	Beiter, Erin																						X		ebeiter@syr.edu	email	
7/15/2025	Buttry, Richard																						X		rbuttry@syr.edu	email	
7/15/2025	Calenzo, Kari																						X		kari.calenzo@gmail.com	email	
7/15/2025	Onderdonk, Kristin							X	X														X		konderdonk3@gmail.com	email	
7/15/2025	Walier, Hannah	Citizens Campaign for the Environment (CCE)																			X		X		hwalier@citizenscampaign.org	email with letter attachment	
7/17/2025	Burgess, Mary					X	X	X	X																moriartyburgess@gmail.com	email	
7/17/2025	Crocker, Evan						X	X																	evan.t.crocker@gmail.com	email	
7/17/2025	Noble, Leslie																						X		nobleladeda@gmail.com	email	

Date	Name	Representing	AGENCY	1.1 Purpose & Need	2.0 Proposed Action & Alternatives	3.1 Land Use - Zoning	3.2 Geology-Soils-Topography	3.3 Water Resources	3.4 Biological Resources	3.5 Historic & Cultural	3.6 & 3.7 Air Quality-GHG-Climate Change	3.8 Solid waste-Hazardous Materials	3.9 Health & Human Safety	3.10 Utilities	3.11 Transportation	3.12 Noise-Vibration	3.13 Visual Effects - Community Character	3.14 Community Facilities, Open Space, Recreation	3.15 Socioeconomic	3.16 Environmental Justice	4.0 Cumulative Effects	5.0 Public Review - Procedural	6.0 General Comments (support & opposition)	Email	submitted via		
7/18/2025	Bjorness Joan	NYS DOT	X																					Joan.Bjorness@dot.ny.gov	email		
7/18/2025	Gardner, Trent							X										X	X					trent.gardner0614@gmail.com	email		
7/18/2025	LaBorde, Lauren						X	X	X		X	X	X	X	X			X	X			X	X	lauren.laborde@gmail.com	email		
7/18/2025	Poletto Anthony																						X	X	anthonypoletto@gmail.com	email	
7/18/2025	Saka, Lisa											X												X	lisacsaka@gmail.com	email	
7/18/2025	Turner, Katie				X			X			X													X	katieturnerart@gmail.com>	USPS	
7/18/2025	Turner, Ralph																								ralph.turner.ri@gmail.com	USPS	
7/19/2025	Donaldson, Jim			X				X																	jamesd436@yahoo.com	email	
7/20/2025	Speicher, Denise						X	X	X		X	X	X	X	X			X	X					X	dspeicher86_8@yahoo.com	email	
7/20/2025	Turner, Katie				X																			X	katieturnerart@gmail.com>	email	
7/20/2025	Vounas, Demetra							X																X	deevounas@yahoo.com>	email	
7/21/2025	Barber, Marissa							X																X	marbarber13@gmail.com	email	
7/21/2025	Bradford, Bryan						X	X	X		X	X	X	X	X			X	X					X	bryanbradford25@gmail.com	email	
7/21/2025	Fordham, Sari							X			X	X													contact@sarfordham.com	email	
7/21/2025	Gill, Kathieen							X										X						X	kmgillphd@aol.com	email	
7/21/2025	Hotaling, Michael	C&S Companies																									mail
7/21/2025	Jervis, Michelle	CR Fletcher																					X		michelle.jervis@crfletcher.com	email	
7/21/2025	Libby, Marni						X	X	X		X	X	X	X	X			X	X					X	mibz936@gmail.com	email	
7/21/2025	Loura, Bud	RestaurantQB																						X	bud@restaurantqb.net	email	
7/21/2025	Rauch, Joanne	CR Fletcher																							joanne.ruach@crfletcher.com	email	
7/22/2025	Ande, H.						X	X	X		X	X	X	X	X			X	X					X	shredbetty70@gmail.com	email	
7/22/2025	Andrychowski, Steven						X	X	X		X	X	X	X	X			X	X					X	wcsteve@yahoo.com	email	
7/22/2025	Angell, JL						X	X	X		X	X	X	X	X			X	X					X	jangell@earthlink.net	email	
7/22/2025	Artemis, Ameno						X	X	X		X	X	X	X	X			X	X					X	amenoartemis@gmail.com	email	
7/22/2025	aruther						X	X	X		X	X	X	X	X			X	X					X	aruther.ny@gmail.com	email	
7/22/2025	aweeeble25						X	X	X		X	X	X	X	X			X	X					X	aweeeble25@gmail.com	email	
7/22/2025	Baka, Ryan						X	X	X		X	X	X	X	X			X	X					X	ryan.baka@icloud.com	email	
7/22/2025	Ball, Charlotta						X	X	X		X	X	X	X	X			X	X					X	mariahball@yahoo.com	email	
7/22/2025	Broome, Ken						X	X	X		X	X	X	X	X			X	X					X	ellesseye@gmail.com	email	
7/22/2025	Brown-Newball, Thyais						X	X	X		X	X	X	X	X			X	X					X	tnadji@gmail.com	email	
7/22/2025	Camahan, Florence						X	X	X		X	X	X	X	X			X	X					X	fjcamahan@gmail.com	email	
7/22/2025	caswank1						X	X	X		X	X	X	X	X			X	X					X	caswank1@gmail.com	email	
7/22/2025	Cohee, Margaret						X	X	X		X	X	X	X	X			X	X					X	mcohee@hotmail.com	USPS	
7/22/2025	Cornelia, Jared						X	X	X		X	X	X	X	X			X	X					X	jaredc1200@gmail.com	email	
7/22/2025	Cotner, David						X	X	X		X	X	X	X	X			X	X					X	hertzlon@gmail.com	email	
7/22/2025	Crawford, Jason						X	X	X		X	X	X	X	X			X	X					X	jrobcraft@aol.com	email	
7/22/2025	Cronin, Cathy						X	X	X		X	X	X	X	X			X	X					X	cathymecronin@gmail.com	email	
7/22/2025	Deshotels, James						X	X	X		X	X	X	X	X			X	X					X	jdesh@iyno.edu	email	
7/22/2025	Diane, Jill						X	X	X		X	X	X	X	X			X	X					X	juliad370@proton.me	email	
7/22/2025	Dieringer, Melanie						X	X	X		X	X	X	X	X			X	X					X	mekler7681@gmail.com	email	
7/22/2025	Doloff, Jacoba						X	X	X		X	X	X	X	X			X	X					X	coaba@cox.net	email	
7/22/2025	Edmondson, Dominique						X	X	X		X	X	X	X	X			X	X					X	dedmondson@cwa-union.org	email	
7/22/2025	Ellison, Martha						X	X	X		X	X	X	X	X			X	X					X	marthaellison1@gmail.com	email	
7/22/2025	Emerich, Diana						X	X	X		X	X	X	X	X			X	X					X	dianaemerich@gmail.com	email	
7/22/2025	Esposito, Louis						X	X	X		X	X	X	X	X			X	X					X	lasur4life@gmail.com	email	
7/22/2025	Fighera, Linda						X	X	X		X	X	X	X	X			X	X					X	teddylucylinda@yahoo.com	email	
7/22/2025	Fonseca, Simone						X	X	X		X	X	X	X	X			X	X					X	plieu36@yahoo.com	email	
7/22/2025	Fox, Ethan						X	X	X		X	X	X	X	X			X	X					X	ethanfox@gmail.com	email	
7/22/2025	Fox, Vicki						X	X	X		X	X	X	X	X			X	X					X	vicki831@earthlink.net	email	
7/22/2025	Fredrick, Cynthia						X	X	X		X	X	X	X	X			X	X					X	fredrick.cynthia@gmail.com	email	
7/22/2025	Funderburk, Lyle						X	X	X		X	X	X	X	X			X	X					X	lyle.funderburk@gmail.com	email	
7/22/2025	Gambaianni, Dominic							X			X			X	X										dgambaianni97@gmail.com>	email	
7/22/2025	Gibb, Ken						X	X	X		X	X	X	X	X			X	X					X	kengibb@gmail.com	email	
7/22/2025	Giffen, Phoenix						X	X	X		X	X	X	X	X			X	X					X	phoenixgiffen@gmail.com	email	
7/22/2025	Gilmore, Susan						X	X	X		X	X	X	X	X			X	X					X	susannadinegilmore@yahoo.com	email	
7/22/2025	Gindele, Abigail						X	X	X		X	X	X	X	X			X	X					X	agindele@gmail.com	email	
7/22/2025	Goin, Cody						X	X	X		X	X	X	X	X			X	X					X	codygoin2021@gmail.com	email	
7/22/2025	Goode, Beth						X	X	X		X	X	X	X	X			X	X					X	goodeb22@gmail.com	email	
7/22/2025	Gorak, Martha						X	X	X		X	X	X	X	X			X	X					X	martha2503@gmail.com	email	
7/22/2025	Gordon, Amanda						X	X	X		X	X	X	X	X			X	X					X	gordongoods407@gmail.com	email	
7/22/2025	Gx, Perry						X	X	X		X	X	X	X	X			X	X					X	perrygx@gmail.com	email	
7/22/2025	Hall, Cory						X	X	X		X	X	X	X	X			X	X					X	coryrose84@aol.com	email	
7/22/2025	Hammermeister, Lisa						X	X	X		X	X	X	X	X			X	X					X	necrohead56@gmail.com	email	
7/22/2025	Hatem, Nader	Pres. King David's Restaurant																					X		info@kingdavids.com	email	
7/22/2025	Hitzler, Stephanie																							X	shitzlat@umich.edu	email	
7/22/2025	Hollinrake, Mark						X	X	X		X	X	X	X	X			X	X					X	markhollinrake1993@gmail.com	email	
7/22/2025	Horwitz, Martin						X	X	X		X	X	X	X	X			X	X					X	martin7ahorwitz@yahoo.com	email	
7/22/2025	Jacobi, E.						X	X	X		X	X	X	X	X			X	X					X	ejacobi@cwa-union.org	email	
7/22/2025	Jim						X	X																			

Date	Name	Representing	AGENCY	1.1 Purpose & Need	2.0 Proposed Action & Alternatives	3.1 Land Use - Zoning	3.2 Geology-Soils-Topography	3.3 Water Resources	3.4 Biological Resources	3.5 Historic & Cultural	3.6 & 3.7 Air Quality-GHG-Climate Change	3.8 Solid waste-Hazardous Materials	3.9 Health & Human Safety	3.10 Utilities	3.11 Transportation	3.12 Noise-Vibration	3.13 Visual Effects - Community Character	3.14 Community Facilities, Open Space, Recreation	3.15 Socioeconomic	3.16 Environmental Justice	4.0 Cumulative Effects	5.0 Public Review - Procedural	6.0 General Comments (support & opposition)	Email	submitted via
7/22/2025	Kliche, Diana						X	X	X		X	X	X	X	X				X	X		X		klichediana@gmail.com	email
7/22/2025	Kulp, Jeff						X	X	X		X	X	X	X	X				X	X		X		jskulp1@gmail.com	email
7/22/2025	Lange, Jana							X																noire.fade@gmail.com	email
7/22/2025	Layne, Alistair						X	X	X		X	X	X	X	X				X	X		X		laynealister@yahoo.com	email
7/22/2025	Lee, Jerry						X	X	X		X	X	X	X	X				X	X		X		jerrylee1102@gmail.com	email
7/22/2025	Leidecker, Jodie						X	X	X		X	X	X	X	X				X	X		X		jodieleidecker@gmail.com	email
7/22/2025	Lombardi, Robert						X	X	X		X	X	X	X	X				X	X		X		bob532@aol.com	email
7/22/2025	Long, Laura						X	X	X		X	X	X	X	X				X	X		X		lauralynn7@gmail.com	email
7/22/2025	Longyear, Sharon						X	X	X		X	X	X	X	X				X	X		X		sharonlongyear@gmail.com	email
7/22/2025	lpodolski						X	X	X		X	X	X	X	X				X	X		X		lpodolski@gmail.com	email
7/22/2025	Lucas, Steve						X	X	X		X	X	X	X	X				X	X		X		slucas78704@gmail.com	email
7/22/2025	M., Amy						X	X	X		X	X	X	X	X				X	X		X		tearingdown3@yahoo.com	email
7/22/2025	M., Frances						X	X	X		X	X	X	X	X				X	X		X		conquerthegreatdivide3@aol.com	email
7/22/2025	Malone, Jim						X	X	X		X	X	X	X	X				X	X		X		ritajim12@gmail.com	email
7/22/2025	May, Lana						X	X	X		X	X	X	X	X				X	X		X		lanamay300@gmail.com	email
7/22/2025	Mccabe, Jace						X	X	X		X	X	X	X	X				X	X		X		mccabejace@gmail.com	email
7/22/2025	McClellan, Ceri						X	X	X		X	X	X	X	X				X	X		X		erlys72@gmail.com	email
7/22/2025	McCobb, S.						X	X	X		X	X	X	X	X				X	X		X		smcobb@beechmere.com	email
7/22/2025	Mendez, J.						X	X	X		X	X	X	X	X				X	X		X		mendezj@hawaii.edu	email
7/22/2025	Murphy, Sharon							X	X		X			X										murphy.sharon2012@gmail.com	email
7/22/2025	Naidnur, Joseph						X	X	X		X	X	X	X	X				X	X		X		jnaidnur@gmail.com	email
7/22/2025	Nicholas, Jill						X	X	X		X	X	X	X	X				X	X		X		jnicholas@rochester.rr.com	email
7/22/2025	Pash, E.						X	X	X		X	X	X	X	X				X	X		X		epash@diamondpharmacy.com	email
7/22/2025	Pfister, Joseph						X	X	X		X	X	X	X	X				X	X		X		a1w2qbyef@mozmail.com	email
7/22/2025	Phillips, J.						X	X	X		X	X	X	X	X				X	X		X		jphillips1259@gmail.com	email
7/22/2025	pittaylor						X	X	X		X	X	X	X	X				X	X		X		pittaylor@gmail.com	email
7/22/2025	Polley, Daniel						X	X	X		X	X	X	X	X				X	X		X		dannypolley@gmail.com	email
7/22/2025	Priem, Lou						X	X	X		X	X	X	X	X				X	X		X		loupriem@icloud.com	email
7/22/2025	Rosenberg, Steven						X	X	X		X	X	X	X	X				X	X		X		sunydays3304@gmail.com	email
7/22/2025	Saxon, Diana						X	X	X		X	X	X	X	X				X	X		X		moondaughter72@hotmail.com	email
7/22/2025	Schlesinger, Fern						X	X	X		X	X	X	X	X				X	X		X		fern.schlesinger@gmail.com	email
7/22/2025	Sekhon, Kanwaldeep						X	X	X		X	X	X	X	X				X	X		X		vytor.tsfc@gmail.com	email
7/22/2025	Seltzer, Elizabeth						X	X	X		X	X	X	X	X				X	X		X		ees01@earthlink.com	email
7/22/2025	Shields, Jamie						X	X	X		X	X	X	X	X				X	X		X		jfillmore66@gmail.com	email
7/22/2025	Sholz, Alyson						X	X	X		X	X	X	X	X				X	X		X		signatures.carmaker214@passinbox.com	email
7/22/2025	Stivulich, Lenore						X	X	X		X	X	X	X	X				X	X		X		msivulich@maine.rr.com	email
7/22/2025	Skalic, Dita						X	X	X		X	X	X	X	X				X	X		X		dita.skalic@gmail.com	email
7/22/2025	Skooog, Gary																						X	skooogfarm@rochester.rr.com	email
7/22/2025	Smith, Jaszmeene						X	X	X		X	X	X	X	X				X	X		X		smith.jaszmeene9@gmail.com	email
7/22/2025	Smith, Malcolm																						X	mgsmith1000@yahoo.com	email
7/22/2025	Smith, Taylor						X	X	X		X	X	X	X	X				X	X		X		taylorsmith1051@gmail.com	email
7/22/2025	Speer, Cheryl						X	X	X		X	X	X	X	X				X	X		X		cherylspeer@gmail.com	email
7/22/2025	Stefano, Lori						X	X	X		X	X	X	X	X				X	X		X		loristefano@gmail.com	email
7/22/2025	Still, Brian						X	X	X		X	X	X	X	X				X	X		X		brianmstill@gmail.com	email
7/22/2025	Thatcher, Tobey						X	X	X		X	X	X	X	X				X	X		X		thtaz2011@gmail.com	email
7/22/2025	threegables1819						X	X	X		X	X	X	X	X				X	X		X		threegables1819@gmail.com	email
7/22/2025	Tia						X	X	X		X	X	X	X	X				X	X		X		tia@anf.com	email
7/22/2025	Trych, S.						X	X	X		X	X	X	X	X				X	X		X		strych916@icloud.com	email
7/22/2025	Vera, Laura						X	X	X		X	X	X	X	X				X	X		X		vera.ranch@gmail.com	email
7/22/2025	Vogel, Steven						X	X	X		X	X	X	X	X				X	X		X		steven.j.vogel@earthlink.net	email
7/22/2025	W., Naomi						X	X	X		X	X	X	X	X				X	X		X		naomi4everafter@hotmail.com	email
7/22/2025	Wahl, Maureen						X	X	X		X	X	X	X	X				X	X		X		mwah411@gmail.com	email
7/22/2025	Wieland, Charles						X	X	X		X	X	X	X	X				X	X		X		casper55@hush.com	email
7/22/2025	Windus, Jared						X	X	X		X	X	X	X	X				X	X		X		jared.windus@gmail.com	email
7/22/2025	Winnubst, Karen						X	X	X		X	X	X	X	X				X	X		X		taos84@earthlink.net	email
7/22/2025	Winters, Briar						X	X	X		X	X	X	X	X				X	X		X		briar.winters@gmail.com	email
7/23/2025	Ackerman, Judith						X	X	X		X	X	X	X	X				X	X		X		ackerperson@yahoo.com	email
7/23/2025	Ahmad, Khadeejah						X	X	X		X	X	X	X	X				X	X		X		info@jobstomoveamerica.org	email
7/23/2025	Becker, Serena						X	X	X		X	X	X	X	X				X	X		X		serenabecker@gmail.com	email
7/23/2025	Beder, Andrej						X	X	X		X	X	X	X	X				X	X		X		beeeeedo@gmail.com	email
7/23/2025	Bernstein, Abbie						X	X	X		X	X	X	X	X				X	X		X		hedgebeast@aol.com	email
7/23/2025	Blum, Eugene						X	X	X		X	X	X	X	X				X	X		X		gab2799@gmail.com	email
7/23/2025	Boot, Patrick						X	X	X		X	X	X	X	X				X	X		X		psi-wines@wanadoo.fr	email
7/23/2025	Brown, Rachel						X	X	X		X	X	X	X	X				X	X		X		rachel_anne_brown@hotmail.com	email
7/23/2025	Caephren, McKenna						X	X	X		X	X	X	X	X				X	X		X		caephren@gmail.com	email
7/23/2025	Campbell, James						X	X	X		X	X	X	X	X				X	X		X		mcampbell641@gmail.com	email
7/23/2025	care4animals						X	X	X		X	X	X	X	X				X	X		X		care4animals@hotmail.co.uk	email
7/23/2025	Casales, David						X	X	X		X	X	X	X	X				X	X		X		david@agrenny.org	email
7/23/2025	Cizenski, Jeffrey																						X	jeffreycizenski@gmail.com	email
7/23/2025	Crossett, Zachary																						X	zacharycrossett@gmail.com	email
7/23/2025	dcouchon						X	X	X		X	X	X	X	X				X	X		X		dcouchon@yahoo.com	email
7/23/2025	Deckel, K.						X	X	X		X	X	X	X	X				X	X		X		kdeckel@maritime.edu	email
7/23/2025	Dickey, Laura						X	X	X		X	X	X	X	X				X	X		X		poetfire40@gmail.com	email

Date	Name	Representing	AGENCY	1.1 Purpose & Need	2.0 Proposed Action & Alternatives	3.1 Land Use - Zoning	3.2 Geology-Soils-Topography	3.3 Water Resources	3.4 Biological Resources	3.5 Historic & Cultural	3.6 & 3.7 Air Quality-GHG-Climate Change	3.8 Solid waste-Hazardous Materials	3.9 Health & Human Safety	3.10 Utilities	3.11 Transportation	3.12 Noise-Vibration	3.13 Visual Effects - Community Character	3.14 Community Facilities, Open Space, Recreation	3.15 Socioeconomic	3.16 Environmental Justice	4.0 Cumulative Effects	5.0 Public Review - Procedural	6.0 General Comments (support & opposition)	Email	submitted via	
7/23/2025	Dinhofer, Jacalyn						X	X	X		X	X	X	X	X				X	X		X		jdinhofer@gmail.com	email	
7/23/2025	Doller, Florence Kingsley, Scott	NBT Bank																					X	FDoller@nbtbank.com	email/letter att.	
7/23/2025	Garitty, Michael						X	X	X		X	X	X	X	X				X	X		X		garitty@nccn.net	email	
7/23/2025	Giorgio, Nicola						X	X	X		X	X	X	X	X				X	X		X		ncl.grg@gmail.com	email	
7/23/2025	Gremillion, Daniel						X	X	X		X	X	X	X	X				X	X		X		frenchcreoleedanny@gmail.com	email	
7/23/2025	Gronim, S.						X	X	X		X	X	X	X	X				X	X		X		sgronim@rcn.com	email	
7/23/2025	harrigan5500						X	X	X		X	X	X	X	X				X	X		X		harrigan5500@mindspring.com	email	
7/23/2025	Hoffman, Melissa						X	X	X		X	X	X	X	X				X	X		X		melissahoffmann5@gmail.com	email	
7/23/2025	Horowitz, Jen						X	X	X		X	X	X	X	X				X	X		X		jenhorowitz3@gmail.com	email	
7/23/2025	hotep_amen						X	X	X		X	X	X	X	X				X	X		X		hotep_amen@yahoo.com	email	
7/23/2025	Jordan, Susan						X	X	X		X	X	X	X	X				X	X		X		honeygirl2361@gmail.com	email	
7/23/2025	Judson, Timothy						X	X	X		X	X	X	X	X				X	X		X		judson.tim@gmail.com	email	
7/23/2025	Juliana, Matt																					X		mattjuliana567@gmail.com	email	
7/23/2025	Kelly, Elizabeth						X	X	X		X	X	X	X	X				X	X		X		simmygirl34@gmail.com	email	
7/23/2025	Kraus, Marion						X	X	X		X	X	X	X	X				X	X		X		krausies@web.de	email	
7/23/2025	Kumar, Anadita						X	X	X		X	X	X	X	X				X	X		X		ananditakumar96@gmail.com	email	
7/23/2025	L., Elijah						X	X	X		X	X	X	X	X				X	X		X		infectedtitan97@gmail.com	email	
7/23/2025	Lackey, Mercedes						X	X	X		X	X	X	X	X				X	X		X		helloelsie@gmail.com	email	
7/23/2025	Lemonik, B.R.						X	X	X		X	X	X	X	X				X	X		X		earthjustice@eeyore18.info	email	
7/23/2025	Magana, Maria						X	X	X		X	X	X	X	X				X	X		X		mariamagana@gmail.com	email	
7/23/2025	Manning, Jody	ED STEAM school																					X	JManning@sccd.us	email	
7/23/2025	Marotta, Tracy						X	X	X		X	X	X	X	X				X	X		X		tracyrocks@gmail.com	email	
7/23/2025	Massey, Carolyn						X	X	X		X	X	X	X	X				X	X		X		caludia112003@outlook.com	email	
7/23/2025	McCaw, Karen						X	X	X		X	X	X	X	X				X	X		X		mccaw.karen@yahoo.com	email	
7/23/2025	Morales, Marisa						X	X	X		X	X	X	X	X				X	X		X		marisamcawthorne@gmail.com	email	
7/23/2025	Morein, Aimee						X	X	X		X	X	X	X	X				X	X		X		photochk611@gmail.com	email	
7/23/2025	Muok, Gwendolyn	NAACP																				X		syracusenaacpactso@gmail.com	email	
7/23/2025	Paul, Corry						X	X	X		X	X	X	X	X				X	X		X		corrypaul@gmail.com	email	
7/23/2025	Pe., El						X	X	X		X	X	X	X	X				X	X		X		liz1952@gmail.com	email	
7/23/2025	Pinque, Meryl						X	X	X		X	X	X	X	X				X	X		X		merypinque@gmail.com	email	
7/23/2025	pupycorn123						X	X	X		X	X	X	X	X				X	X		X		pupycorn123@yahoo.es	email	
7/23/2025	Renfro, Robert						X	X	X		X	X	X	X	X				X	X		X		ngongpingrenfro@gmail.com	email	
7/23/2025	Robinson, Jill						X	X	X		X	X	X	X	X				X	X		X		jilir1017@gmail.com	email	
7/23/2025	Rollins, Jessica						X	X	X		X	X	X	X	X				X	X		X		litlezen67@aol.com	email	
7/23/2025	Ruther, AJ						X	X	X		X	X	X	X	X				X	X		X		aruther.ny@gmail.com	email	
7/23/2025	sarank						X	X	X		X	X	X	X	X				X	X		X		sarank@mac.com	email	
7/23/2025	Scowen, Pat						X	X	X		X	X	X	X	X				X	X		X		pat.scowen@icloud.com	email	
7/23/2025	Skolnick, Kate						X	X	X		X	X	X	X	X				X	X		X		krs1123@gmail.com	email	
7/23/2025	Smith, Terrie						X	X	X		X	X	X	X	X				X	X		X		sugarfootc@aol.com	email	
7/23/2025	Stern, Richard						X	X	X		X	X	X	X	X				X	X		X		rsisyh@yahoo.com	email	
7/23/2025	Stofko, John						X	X	X		X	X	X	X	X				X	X		X		johnstofko@yahoo.com	email	
7/23/2025	Stoff, Jackie						X	X	X		X	X	X	X	X				X	X		X		jacqueline4sight@aol.com	email	
7/23/2025	Swanker, Leigh						X	X	X		X	X	X	X	X				X	X		X		swank6179@gmail.com	email	
7/23/2025	vrounds						X	X	X		X	X	X	X	X				X	X		X		vrounds@gmail.com	email	
7/23/2025	Whitemarsh, Olivia						X	X	X		X	X	X	X	X				X	X		X		olwhitma@esf.edu	email	
7/23/2025	Wright, Ken	IKEA Foundation Ambassador											X											kbwbw3@gmail.com	email	
7/24/2025	1942info						X	X	X		X	X	X	X	X				X	X		X		1942info@gmail.com	email	
7/24/2025	Adams, Steph							X					X							X		X				Public Hearing
7/24/2025	Barnett, Sydney							X	X					X					X							Public Hearing
7/24/2025	Bernard, Liza							X						X												Public Hearing
7/24/2025	Bleier, Brent																					X				Public Hearing
7/24/2025	Block, Ellen																		X	X			X			Public Hearing
7/24/2025	Bottar, David	CNY Regional Planning and Development Board																	X				X			Public Hearing
7/24/2025	Bouchard, Brian	CHA Consulting																					X			Public Hearing
7/24/2025	Bridges, Elizabeth																	X								Public Hearing
7/24/2025	Bulla, Joe							X														X				Public Hearing
7/24/2025	Caplan, Peter													X					X			X				Public Hearing
7/24/2025	Cappon, Brian							X			X		X					X			X			bcappon123@gmail.com	email	
7/24/2025	Caprio, David																						X			Public Hearing
7/24/2025	Caselas, David								X													X				Public Hearing
7/24/2025	Clavari, Paul																							paul.clavari@gmail.com	email	
7/24/2025	Coffey, John						X	X	X		X	X	X	X	X				X	X		X		coffeyjohnp@aol.com	email	
7/24/2025	Coppola, Hillary-Anne							X	X		X	X	X	X	X				X			X				Public Hearing
7/24/2025	Crossett, Susan	Sapphire Recruitment																					X			Public Hearing
7/24/2025	D'Agostino, Jim	Central New York Technology Development Organization																					X			Public Hearing
7/24/2025	Damico, Sam							X						X												Public Hearing
7/24/2025	Dannible, Christy							X	X		X	X		X	X											Public Hearing
7/24/2025	D'Hollander, Raymond																						X			Public Hearing
7/24/2025	Doe, John				X			X	X			X		X												Public Hearing
7/24/2025	Doody, Paul							X				X		X					X			X	X			Public Hearing
7/24/2025	Dove, Alice													X	X				X			X				Public Hearing

Date	Name	Representing	AGENCY	1.1 Purpose & Need	2.0 Proposed Action & Alternatives	3.1 Land Use - Zoning	3.2 Geology-Soils-Topography	3.3 Water Resources	3.4 Biological Resources	3.5 Historic & Cultural	3.6 & 3.7 Air Quality-GHG-Climate Change	3.8 Solid waste-Hazardous Materials	3.9 Health & Human Safety	3.10 Utilities	3.11 Transportation	3.12 Noise-Vibration	3.13 Visual Effects - Community Character	3.14 Community Facilities, Open Space, Recreation	3.15 Socioeconomic	3.16 Environmental Justice	4.0 Cumulative Effects	5.0 Public Review - Procedural	6.0 General Comments (support & opposition)	Email	submitted via		
7/24/2025	Drew, Roggie							X					X						X			X			Public Hearing		
7/24/2025	Eza, Tonya	Immanuel Lutheran Church					X	X	X	X		X	X	X	X	X										Public Hearing	
7/24/2025	Farnsworth, Frank																						X			Public Hearing	
7/24/2025	Ferguson, Sarah	Operating Engineers Local 158																					X			Public Hearing	
7/24/2025	Fike, Chip													X					X				X			Public Hearing	
7/24/2025	Fitzsimmons, Kristina							X	X					X									X			Public Hearing	
7/24/2025	Flick, Susan																					X				Public Hearing	
7/24/2025	Fournier, Steve	Keybank, CNY																					X			Public Hearing	
7/24/2025	Gardner, Trent																		X	X						Public Hearing	
7/24/2025	Gately, Sue						X	X				X		X												Public Hearing	
7/24/2025	Gernhardt, Nicholas														X								X			Public Hearing	
7/24/2025	Greco, Mike																									Public Hearing	
7/24/2025	Haas, Karen	Sterling Water Stewards						X				X		X								X				Public Hearing	
7/24/2025	Harris, Christopher	Rochester Institute of Technology																					X	cahgrf@rit.edu		email	
7/24/2025	Hart Jr., Guy							X			X								X				X			Public Hearing	
7/24/2025	Hilton, Dr. Warren	Onondaga Community College, President																					X			Public Hearing	
7/24/2025	Hinkelman, Carol						X	X	X		X	X	X	X	X				X	X		X		carolhroc@gmail.com		email	
7/24/2025	Hotaling, Louise						X	X				X		X				X	X							Public Hearing	
7/24/2025	Huerta, Raul							X															X			Public Hearing	
7/24/2025	Hughes, Don	SustainCNY			X			X	X		X	X	X													Public Hearing	
7/24/2025	Hunt, Barbara								X													X				Public Hearing	
7/24/2025	Ingram, Evelyn	Wegmans Food Markets																					X			Public Hearing	
7/24/2025	Jagusah, MoAde							X											X	X						Public Hearing	
7/24/2025	Jennejahn, Rick								X			X			X								X			Public Hearing	
7/24/2025	Kaputa, Emma																		X							Public Hearing	
7/24/2025	Keys, David													X	X											Public Hearing	
7/24/2025	Kochian, Lauren	Museum of Science and Technology - Downtown Syracuse																					X			Public Hearing	
7/24/2025	Koegel, Steven	Business Communications with Centro																					X			Public Hearing	
7/24/2025	Koskowski, Justin	Local 669, Road Sprinkler Filters																					X			Public Hearing	
7/24/2025	Lancette, Greg	Central and Northern NY Building and Construction Trades Council																					X			Public Hearing	
7/24/2025	Larioni, Greg	Lockheed Martin																					X	greg.larioni@lmco.com			Public Hearing
7/24/2025	Larson, Dan							X				X	X	X												Public Hearing	
7/24/2025	Lauzon, Beth							X				X	X													Public Hearing	
7/24/2025	Law, Tom							X				X		X								X				Public Hearing	
7/24/2025	LeMura, Linda							X			X												X			Public Hearing	
7/24/2025	Loeffler, Martha																					X	X	mkleoffi@pm.me		email	
7/24/2025	Longo, Anthony																						X			Public Hearing	
7/24/2025	Lopez, Melissa																		X				X			Public Hearing	
7/24/2025	Lorefice, George	Climate Change Awareness and Action									X															Public Hearing	
7/24/2025	M., John							X																		Public Hearing	
7/24/2025	Mager, Andy										X			X					X	X		X				Public Hearing	
7/24/2025	Manning, Jody																						X			Public Hearing	
7/24/2025	Marzullo, Alan	IBEW Local 43																					X	amarzullo@ibew43.org		email/letter attach.	
7/24/2025	Matthews, Desiree													X									X			Public Hearing	
7/24/2025	McManus, Hillary							X	X		X					X						X				Public Hearing	
7/24/2025	Mercier, Roger																						X			Public Hearing	
7/24/2025	Mikulewicz, Dr. Michael							X													X		X			Public Hearing	
7/24/2025	Miller, Austin							X	X							X										Public Hearing	
7/24/2025	Miller, Fred							X						X												Public Hearing	
7/24/2025	Mohr, Meredith						X	X	X		X	X	X	X	X				X	X		X		meredithmohr2@gmail.com		email	
7/24/2025	Monostory, Les	CNY Chapter Izaak Walton League of America						X				X														Public Hearing	
7/24/2025	Mugnaini, Elio						X	X	X		X	X	X	X	X				X	X		X		mugelsis@livecom.it		email	
7/24/2025	Muck, Gwendolyn	The National Association for the Advancement of Colored People						X						X												Public Hearing	
7/24/2025	Nistico, Jim																						X			Public Hearing	
7/24/2025	Nitschke, Sorja						X	X	X		X	X	X	X	X				X	X		X		sorjanitschke@gmail.com		email	
7/24/2025	Norensky, Jeff								X				X		X									jnorensky@gmail.com		email	
7/24/2025	Norensky, Jeff									X			X		X											Public Hearing	
7/24/2025	Ossenbruggen, Paul																									Public Hearing	
7/24/2025	Pack, Patty													X								X		patty.pack@gmail.com		email	
7/24/2025	Pelkey, Bill				X																					Public Hearing	
7/24/2025	Price, Darin																						X			Public Hearing	

Date	Name	Representing	AGENCY	1.1 Purpose & Need	2.0 Proposed Action & Alternatives	3.1 Land Use - Zoning	3.2 Geology-Soils-Topography	3.3 Water Resources	3.4 Biological Resources	3.5 Historic & Cultural	3.6 & 3.7 Air Quality-GHG-Climate Change	3.8 Solid waste-Hazardous Materials	3.9 Health & Human Safety	3.10 Utilities	3.11 Transportation	3.12 Noise-Vibration	3.13 Visual Effects - Community Character	3.14 Community Facilities, Open Space, Recreation	3.15 Socioeconomic	3.16 Environmental Justice	4.0 Cumulative Effects	5.0 Public Review - Procedural	6.0 General Comments (support & opposition)	Email	submitted via	
7/24/2025	Przepiora, John				X			X	X		X				X	X			X			X			Public Hearing	
7/24/2025	Raymond, Vince	VIP Structures																					X	vraymond@vipstructures.com	email	
7/24/2025	Riina-Ferrier, Timothy							X	X					X								X			Public Hearing	
7/24/2025	Robbins, George													X	X										Public Hearing	
7/24/2025	Robinson, Cal							X	X		X							X							Public Hearing	
7/24/2025	Santee, Brad							X			X					X									Public Hearing	
7/24/2025	Schaefer, Pat				X			X	X																Public Hearing	
7/24/2025	Scharoun, Hunter																					X			Public Hearing	
7/24/2025	Serviss, Keanna										X	X													Public Hearing	
7/24/2025	Sgenon, Nyawenha (Printup, Loreen)							X	X																Public Hearing	
7/24/2025	Shinn, Jamie																					X			Public Hearing	
7/24/2025	Sio, Ben	Center State, Regional Chamber of Commerce and Economic Development																					X		Public Hearing	
7/24/2025	Sosnowski Deb						X	X	X		X	X	X	X	X			X	X			X		deb.sosnowski@gmail.com	email	
7/24/2025	Spreter, Bill	CNY Alliance for Retired Americans						X										X							Public Hearing	
7/24/2025	Steiner, A.L.						X	X	X		X	X	X	X	X			X	X			X		asteinerry@gmail.com	email	
7/24/2025	Stronski, Ed													X								X			Public Hearing	
7/24/2025	Taddeo, Andy							X						X		X									Public Hearing	
7/24/2025	Taroli, Matthew	Onondaga and Cortland-Madison BOCES																							Public Hearing	
7/24/2025	Tesoriero, Lorenzo	Local 30 Heat and Frost Insulators																							Public Hearing	
7/24/2025	Thompson, Mary	Home Builders and Remodelers of CNY																							Public Hearing	
7/24/2025	Travis, Chris						X	X	X		X	X	X	X	X			X	X			X		chrisdtravis@yahoo.com	email	
7/24/2025	Treier, Merike	Downtown Committee of Syracuse						X				X		X				X							Public Hearing	
7/24/2025	Troiano, Dan																	X							Public Hearing	
7/24/2025	Tubolino, Anthony	Operating Engineer's Local 158																X							Public Hearing	
7/24/2025	Veronica, Josh	Co-convenors of NY SMART I-Corridor Regional Tech Hub																							Public Hearing	
7/24/2025	Webb, Neil																								Public Hearing	
7/24/2025	Wheeler, Jim							X																	Public Hearing	
7/24/2025	Willsbrough, Joss							X	X		X			X				X	X			X			Public Hearing	
7/24/2025	Wood, Richard	Faith Impact Team of Central Crossroads Conference						X	X			X										X	X		Public Hearing	
7/24/2025	Yang, Raymond							X			X			X								X	X		Public Hearing	
7/25/2025	Cline, Martha			X		X								X											marthcline@aol.com	email
7/25/2025	Hollinrake, Mark						X	X	X		X	X	X	X	X			X	X			X		markhollinrake1993@gmail.com	email	
7/25/2025	McGuinness, Karen						X	X	X		X	X	X	X	X			X	X			X		mindgarden112@aol.com	email	
7/25/2025	Stage, Dave							X																	davestage@me.com	email
7/26/2025	Debbie Thom						X	X	X		X	X	X	X	X			X	X			X		thorndebbie@comcast.net	email	
7/26/2025	Stowell, Theresa														X										stowelltheresa@gmail.com	email
7/27/2025	Berlant, Rebecca						X	X	X		X	X	X	X	X			X	X			X		rsberlant@aol.com	email	
7/27/2025	Gremillion, Daniel						X	X	X		X	X	X	X	X			X	X			X		frenchreoleddanny@gmail.com	email	
7/27/2025	Jaeeunlee, Anna						X	X	X		X	X	X	X	X			X	X			X		annajaeunlee@gmail.com	email	
7/27/2025	Roche, Candace						X	X	X		X	X	X	X	X			X	X			X		candace8027@gmail.com	email	
7/27/2025	Smith, Malcolm													X											mgsmith1000@yahoo.com	email
7/27/2025	Wetlands, Mal						X	X	X		X	X	X	X	X			X	X			X		mgsmith1000@gmail.com	email	
7/28/2025	Ahmad, Khadeejah																					X		info@jobstomoveamerica.org	email	
7/28/2025	Cuellar, Stephanie						X	X	X		X	X	X	X	X			X	X			X		stephaniecuellar67@gmail.com	email	
7/28/2025	Gataletto, Donna						X	X	X		X	X	X	X	X			X	X			X		dsegmail@yahoo.com	email	
7/28/2025	Giarrusso, Kelly													X	X										henryskelly@yahoo.com	email
7/28/2025	Propp, Rachael						X	X	X		X	X	X	X	X			X	X			X		rachaelpropp86@icloud.com	email	
7/28/2025	Rizzo, Francesco						X	X	X		X	X	X	X	X			X	X			X		far11@georgetown.edu	email	
7/28/2025	Sherfield, Robert					X								X											rshen6@aol.com	email
7/28/2025	Swanker, Leigh						X	X	X		X	X	X	X	X			X	X			X		swank6179@gmail.com	email	
7/28/2025	Taren, Cindy							X			X														cmt3155@live.com	email with attachment
7/28/2025	Ukoha, Grace						X	X	X		X	X	X	X	X			X	X			X		gugruggle@gmail.com	email	
7/28/2025	Younas, Dee						X	X	X		X	X	X	X	X			X	X			X		deevounas@yahoo.com	email	
7/29/2025	Bassett, Scott						X	X	X		X	X	X	X	X			X	X			X		carbietron@gmail.com	email	
7/29/2025	Kuehnel, Robert							X	X																rkhuehnel@gmail.com	email
7/29/2025	Maggi, Gary						X	X	X		X	X	X	X	X			X	X			X		garysmaggi@gamil.com	email	
7/29/2025	Morris, Sandy							X			X		X												sandymorris01@me.com	email
7/29/2025	Morris, Wayne							X			X	X	X												wthomasmorris@icloud.com	email
7/29/2025	Randall, Douglas										X			X											bflo66@yahoo.com	email
7/29/2025	Swerdlow, Joby							X	X		X														joby.swerdlow@gmail.com	email
7/29/2025	Varone, Vail						X	X	X		X	X	X	X	X			X	X			X		varonevail@gmail.com	email	
7/29/2025	Vonneorstand, Ron						X	X	X		X	X	X	X	X			X	X			X		ron@vannorstrandlaw.com	email	
7/30/2025	Finlinson, Shawn						X	X	X		X	X	X	X	X			X	X			X		shawnfinlinson@yahoo.com	email	
7/30/2025	Rudisill, Cathy							X																	cathyrudisill@gmail.com	email/att
7/30/2025	skorman06						X	X	X		X	X	X	X	X			X	X			X		skorman06@gmail.com	email	
7/31/2025	Brindle-Khym, HeeWon																								heewonkhym@hotmail.com	email

Date	Name	Representing	AGENCY	1.1 Purpose & Need	2.0 Proposed Action & Alternatives	3.1 Land Use - Zoning	3.2 Geology-Soils-Topography	3.3 Water Resources	3.4 Biological Resources	3.5 Historic & Cultural	3.6 & 3.7 Air Quality-GHG-Climate Change	3.8 Solid waste-Hazardous Materials	3.9 Health & Human Safety	3.10 Utilities	3.11 Transportation	3.12 Noise-Vibration	3.13 Visual Effects - Community Character	3.14 Community Facilities, Open Space, Recreation	3.15 Socioeconomic	3.16 Environmental Justice	4.0 Cumulative Effects	5.0 Public Review - Procedural	6.0 General Comments (support & opposition)	Email	submitted via
7/31/2025	Brown-Newball, Thyais						X	X	X		X	X	X	X	X				X	X		X		tnadji@gmail.com	email
7/31/2025	Lucey, Kate						X	X	X		X	X	X	X	X				X	X		X		klucey54@gmail.com	email
7/31/2025	Taylor, Yvonne						X	X	X		X	X	X	X	X				X	X		X		gasfreeseencagiri@gmail.com	email
7/31/2025	Walker, Shatara						X	X	X		X	X	X	X	X				X	X		X		shataraw311@gmail.com	email
8/1/2025	Carlson, Melissa						X	X	X		X	X	X	X	X				X	X		X		melissacarson22@gmail.com	email
8/1/2025	Green, Diana							X	X		X	X	X	X	X				X			X		dgreen97@twcny.rr.com	email
8/1/2025	Htkeleher						X	X	X		X	X	X	X	X				X	X		X		htkeleher@gmail.com	email
8/1/2025	Kellogg, Syd						X	X	X		X	X	X	X	X				X	X		X		sydthekid521@gmail.com	email
8/1/2025	Lawrence, Leslie																					X		lelaw1963@gmail.com	email
8/1/2025	Spock, Gregory						X	X	X		X	X	X	X	X				X	X		X		gregorymspock@gmail.com	email
8/1/2025	taj269						X	X	X		X	X	X	X	X				X	X		X		taj269@gmail.com	email
8/2/2025	Kellogg, Syd						X	X	X		X	X	X	X	X				X	X		X		sydthekid521@gmail.com	email
8/2/2025	Lawrence, Leslie							X			X													lelaw1963@gmail.com	email
8/3/2025	Fernandez, Cristofer	OFM Conv					X	X	X		X	X	X	X	X				X	X		X		cristofer.fernandez@olaprovince.org	email
8/3/2025	House, Lynn						X	X	X		X	X	X	X	X				X	X		X		Lynnhouse59@gmail.com	email
8/3/2025	Lerner, Dennis						X	X	X		X	X	X	X	X				X	X		X		lerner.law2@gmail.com	email
8/3/2025	Marcotte, Camille						X	X	X		X	X	X	X	X				X	X		X		ctmarcott@gmail.com	email/att
8/3/2025	Powell, Dean																						X	deanpowell929@gmail.com	email
8/4/2025	Coreanna						X	X	X		X	X	X	X	X				X	X		X		coreanna@gmail.com	email
8/4/2025	D'Hollander, Raymond						X	X	X														X	ray.dhollander@gmail.com	email
8/4/2025	Dunlavy, Tim														X									flattop71@gmail.com	email
8/4/2025	Kellogg, Syd						X	X	X		X	X	X	X	X				X	X		X		sydthekid521@gmail.com	email
8/4/2025	Kirsch, Cal						X	X	X		X	X	X	X	X				X	X		X		mckirsch2@gmail.com	email
8/4/2025	Oliver, JoAnne								X																email
8/4/2025	Ryon, Les							X	X		X			X											email/att
8/5/2025	Ascher, Kevin							X	X		X	X		X										kdascher@gmail.com	email
8/5/2025	Battaly, Gertrude							X	X		X	X		X										merlin@pipeline.com	email
8/5/2025	Brown-Newball, Thyais						X	X	X		X	X	X	X	X				X	X		X		tnadji@gmail.com	email
8/5/2025	Buttimer, Dee							X	X		X	X		X										deettdbuttiner@gmail.com	email
8/5/2025	Carman, Paige							X	X		X	X		X										paigecrunch@yahoo.com	email
8/5/2025	Deen, Sheleeza							X	X		X	X		X										kadjia706@gmail.com	email
8/5/2025	Frankel, Barry							X	X		X	X		X										ibfive@aol.com	email
8/5/2025	Gateley, Susan						X	X	X		X	X	X	X	X				X	X		X		susan@silverwaters.com	email
8/5/2025	Heinzelman, Stephen							X	X		X	X		X										sheinzel@gmail.com	email
8/5/2025	Horowitz, Jen							X	X		X	X		X										jenhorowitz3@gmail.com	email
8/5/2025	Johnson, Ryan							X	X		X	X		X										ryan.p.johnson198115@gmail.com	email
8/5/2025	Kellogg, Syd						X	X	X		X	X	X	X	X				X	X		X		sydthekid521@gmail.com	email
8/5/2025	Kimball, Hubert							X	X		X	X		X										contr14@aol.com	email
8/5/2025	Kragh, Sonia	Climate Change Awareness and Action, Inc.						X			X			X	X					X		X		soniakragh@gmail.com	email/att
8/5/2025	Lawrence, Leslie							X																lelaw1963@gmail.com	email
8/5/2025	Lazarek, John							X	X		X	X		X										rbmusicj@aim.com	email
8/5/2025	Markovich, Claudia							X	X		X	X		X										artasticedestination@gmail.com	email
8/5/2025	Miller, David	JADAK Technologies																					X	zzzdavemiller@gmail.com	email
8/5/2025	Nikushkina, Natalia							X	X		X	X		X										raptors.foggier-7m@icloud.com	email
8/5/2025	Ryon, Karen						X	X	X		X	X	X	X	X				X	X		X		ryon1051@gmail.com	email
8/5/2025	Schmid, Judy						X	X	X		X	X	X	X	X				X	X		X		schmid@twcny.rr.com	email
8/5/2025	Steiner, A.L.						X	X	X		X	X	X	X	X				X	X		X		asteinerry@gmail.com	email
8/5/2025	Tignaneli, Doreen							X	X		X	X		X										doreentig@aol.com	email
8/5/2025	Ulex, Evelyn							X	X		X	X		X										ulex29@gmail.com	email
8/6/2025	Amisano, David							X	X		X	X		X										ddpa74@aol.com	email
8/6/2025	Ashleigh, Moira						X	X	X		X	X	X	X	X				X	X		X		moira@solsticesun.com	email
8/6/2025	Astrof, Iris							X	X		X	X		X										irisaastrof@aol.com	email
8/6/2025	Babcock, David							X			X	X	X	X	X					X				dave.babcock21@gmail.com	email
8/6/2025	Banaszak, Donald						X	X	X		X	X	X	X	X				X	X		X		banaszkd@gmail.com	email
8/6/2025	Baron, Jennifer							X	X		X	X		X										JenBaron222@gmail.com	email
8/6/2025	Bauer, Lani							X	X		X	X		X										lani.bauer1@yahoo.com	email
8/6/2025	Biesemeyer, Carol							X	X		X	X											X	cbieseme@twcny.rr.com	email
8/6/2025	Birch, Lorne							X	X		X	X		X										birchlorne@gmail.com	email
8/6/2025	Bohl, Madeline						X	X	X		X	X	X	X	X				X	X		X		spikyhairedmgersen@duck.com	email
8/6/2025	Bort, Madeleine						X	X	X		X	X	X	X	X				X	X		X		r45m46@yahoo.com	email
8/6/2025	Bort, Ronald						X	X	X		X	X	X	X	X				X	X		X		r45m46@yahoo.com	email
8/6/2025	Boyle, Amanda						X	X	X		X	X	X	X	X				X	X		X		a.boyle95@gmail.com	email
8/6/2025	Brown-Newball, Thyais						X	X	X		X	X	X	X	X				X	X		X		tnadji@gmail.com	email
8/6/2025	Carivan, Liz						X	X	X		X	X	X	X	X				X	X		X		lzcarrivan@gmail.com	email
8/6/2025	Chitwood, Melissa							X	X		X	X		X										sockpuppet@aol.com	email
8/6/2025	Clark, Margurite							X	X		X	X		X										clarkcny@yahoo.com	email
8/6/2025	Cook, Steven							X	X		X	X		X										shcook0428@gmail.com	email
8/6/2025	Cooper, Rodney																						X	jwc7275@yahoo.com	email
8/6/2025	Couchon, Doug						X	X	X		X	X	X	X	X				X	X		X		dcouchon@yahoo.com	email

Date	Name	Representing	AGENCY	1.1 Purpose & Need	2.0 Proposed Action & Alternatives	3.1 Land Use - Zoning	3.2 Geology-Soils-Topography	3.3 Water Resources	3.4 Biological Resources	3.5 Historic & Cultural	3.6 & 3.7 Air Quality-GHG-Climate Change	3.8 Solid waste-Hazardous Materials	3.9 Health & Human Safety	3.10 Utilities	3.11 Transportation	3.12 Noise-Vibration	3.13 Visual Effects - Community Character	3.14 Community Facilities, Open Space, Recreation	3.15 Socioeconomic	3.16 Environmental Justice	4.0 Cumulative Effects	5.0 Public Review - Procedural	6.0 General Comments (support & opposition)	Email	submitted via		
8/6/2025	Wiles, Sharon							X	X		X	X		X										swiles.1@gmail.com	email		
8/6/2025	Winter, Kristina							X	X		X	X		X											kristinawinterdesigns@gmail.com	email	
8/6/2025	yayoi						X	X	X		X	X	X	X	X				X	X					yayoi@zerowasteithaca.org	email	
8/6/2025	Yeomans, Meghan						X	X	X		X	X	X	X	X				X	X					meghan.yeomans@gmail.com	email	
8/6/2025	Zaika, Erin						X	X	X		X	X	X	X	X				X	X					elmarie119@gmail.com	email	
8/6/2025	zpstrass						X	X	X		X	X	X	X	X				X	X					zpstrass@bu.edu	email	
8/7/2025	Barry, Renee						X	X	X		X	X	X	X	X				X	X					renee.marie.barry@gmail.com	email	
8/7/2025	Bridges, Elizabeth						X	X	X		X	X	X	X	X				X	X					hwjh_37@yahoo.com	email	
8/7/2025	Casales, David						X	X	X		X	X	X	X	X				X	X					david@agreenvy.org	email	
8/7/2025	Cooke, JoAnn						X	X	X		X	X	X	X	X				X	X					joanncooke1124@gmail.com	email	
8/7/2025	Farley, Annette						X		X				X						X						humminga51@yahoo.com	email	
8/7/2025	Farley, Annette							X				X	X	X											humminga51@yahoo.com	email	
8/7/2025	Gronim, Sara										X			X											sgronim@rcn.com	email	
8/7/2025	Hart, Lisa						X	X	X		X	X	X	X	X				X	X					hart106@verizon.net	email	
8/7/2025	Harvey, Rita							X	X		X	X		X					X	X					rj.harvey4@gmail.com	email	
8/7/2025	Huntley, Pete							X		X									X						petehuntley@aol.com	email	
8/7/2025	Huntley, Pete									X															petehuntley@aol.com	email	
8/7/2025	Huntley, Pete							X				X													petehuntley@aol.com	email	
8/7/2025	johnrusso						X	X	X		X	X	X	X	X				X	X					johnrusso6@hotmail.com	email	
8/7/2025	Kellogg, Syd						X	X	X		X	X	X	X	X				X	X					sydthekid521@gmail.com	email	
8/7/2025	Kraus, Leah						X	X	X		X	X	X	X	X				X	X					leah.m.kraus@gmail.com	email	
8/7/2025	Kraus, Leah							X	X			X											X		leah.m.kraus@gmail.com	email	
8/7/2025	Lapp Kathryn							X	X		X	X		X											JadeSpawn@hotmail.com	email	
8/7/2025	McManus, Hilary							X	X		X									X							email
8/7/2025	Miller, Kanischa						X	X	X		X	X	X	X	X				X	X					KanischaMiller@gmail.com	email	
8/7/2025	Neville, Lisa						X	X	X		X	X	X	X	X				X	X					lneville10@gmail.com	email	
8/7/2025	Prasad, Sunita						X	X	X		X	X	X	X	X				X	X					sunitadee@gmail.com	email	
8/7/2025	Quimby, Eileen							X	X		X	X		X											Johnstoe62@gmail.com	email	
8/7/2025	Ryden, Wendy						X	X	X		X	X	X	X	X				X	X					wendy.ryden@liu.edu	email	
8/7/2025	Saka, Lisa						X	X	X		X	X	X	X	X				X	X					isacsaka@gmail.com	email	
8/7/2025	Schmitt, Brynn						X	X	X		X	X	X	X	X				X	X					brynnschmitt@yahoo.com	email	
8/7/2025	Serigano, Joseph							X	X		X	X		X											joeser167@gmail.com	email	
8/7/2025	Smock, Amanda							X	X		X	X		X											addiesmock@yahoo.com	email	
8/7/2025	Weiler, Angela							X			X	X													awweiler@gmail.com	email	
8/7/2025	Wheeler, James							X																			email
8/7/2025	Williams, Qiana						X	X	X		X	X	X	X	X				X	X					qianaki@gmail.com	email	
8/7/2025	Zaja, Mario														X				X	X					dalmaticum@gmail.com	email	
8/7/2025	Zingaro, Marie						X	X	X		X	X	X	X	X				X	X					marie.zingaro@yahoo.com	email	
8/8/2025	Acampora, Melanie						X	X	X		X	X	X	X	X				X	X					melaacampora@gmail.com	email	
8/8/2025	Alcamo, Amanda						X	X	X		X	X	X	X	X				X	X					moffattmandy14@aol.com	email	
8/8/2025	Aliperti, Vinny						X	X	X		X	X	X	X	X				X	X					vinny@billsborowinery.com	email	
8/8/2025	Almeida, Robert						X	X	X		X	X	X	X	X				X	X					robert.almeida75@gmail.com	email	
8/8/2025	Andrea, Michael						X	X	X		X	X	X	X	X				X	X					mkandrea1@gmail.com	email	
8/8/2025	Armstrong, T.L.								X		X		X														mail
8/8/2025	Banaszak, Donald						X	X	X		X	X	X	X	X				X	X					banazakd@gmail.com	email	
8/8/2025	Bare, Eric						X	X	X		X	X	X	X	X				X	X					trebares@juno.com	email	
8/8/2025	Basile, Diane																										email
8/8/2025	BeField, Steven						X	X	X		X	X	X	X	X				X	X					squeak-n-chew@outlook.com	email	
8/8/2025	Bell, Brooke						X	X	X		X	X	X	X	X				X	X					bell.brookebellbrooke@gmail.com	email	
8/8/2025	Benson, Sarah						X	X	X		X	X	X	X	X				X	X					majedufa@yahoo.com	email	
8/8/2025	Berberich, GloriaJean						X	X	X		X	X	X	X	X				X	X					glcj29@hotmail.com	email	
8/8/2025	Berberich, Roy						X	X	X		X	X	X	X	X				X	X					glcj29@hotmail.com	email	
8/8/2025	Blesanz, Karen						X	X	X		X	X	X	X	X				X	X					karenb13@gmail.com	email	
8/8/2025	Boesky, Gayle						X	X	X		X	X	X	X	X				X	X					gboesky@icloud.com	email	
8/8/2025	Boguske, Matthew						X	X	X		X	X	X	X	X				X	X					mboguske@yahoo.com	email	
8/8/2025	Bohlen, Curtis						X	X	X		X	X	X	X	X				X	X					cd1997bbb@aol.com	email	
8/8/2025	Briggs, David						X	X	X		X	X	X	X	X				X	X					euclidsgeometry@gmail.com	email	
8/8/2025	Brooks, Sarah						X	X	X		X	X	X	X	X				X	X					slstrake75@gmail.com	email	
8/8/2025	Brotman, Benay						X	X	X		X	X	X	X	X				X	X					benay.brotman@gmail.com	email	
8/8/2025	Brumfield, Gregory						X	X	X		X	X	X	X	X				X	X					gregorybrumfield98@twc.com	email	
8/8/2025	Budny, Debby						X	X	X		X	X	X	X	X				X	X					debrnlt@aol.com	email	
8/8/2025	Burrows, Janet						X	X	X		X	X	X	X	X				X	X					jrjburrows@twcny.rr.com	email	
8/8/2025	Byers, L.						X	X	X		X	X	X	X	X				X	X					kneehighsfall@gmail.com	email	
8/8/2025	Caprood, Pat						X	X	X		X	X	X	X	X				X	X					cpetesurf@aol.com	email	
8/8/2025	Catalano, Jim						X	X	X		X	X	X	X	X				X	X					jimcatalano1@gmail.com	email	
8/8/2025	Chamama, Eric						X	X	X		X	X	X	X	X				X	X					ericchamama1@gmail.com	email	
8/8/2025	Chase, Jayni						X	X	X		X	X	X	X	X				X	X					jayni@cjchase.org	email	
8/8/2025	Cleary, Moss						X	X	X		X	X	X	X	X				X	X					mossccleary@gmail.com	email	
8/8/2025	Clements, Roberta						X	X	X		X	X	X	X	X				X	X					robertaaclements@gmail.com	email	
8/8/2025	Colebrook, Brandy				X		X	X	X		X	X	X	X	X				X	X					bcolebrook@nyalt.com	email	
8/8/2025	Comeau, Russel							X	X		X	X		X											russ@bassdozer.com	email	
8/8/2025	Cording, Carl						X	X	X		X	X	X	X	X				X	X					cordingac2@gmail.com	email	
8/8/2025	Cranker, Joy						X	X	X		X	X	X	X	X				X	X					talkpiggy@aol.com	email	

Date	Name	Representing	AGENCY	1.1 Purpose & Need	2.0 Proposed Action & Alternatives	3.1 Land Use - Zoning	3.2 Geology-Soils-Topography	3.3 Water Resources	3.4 Biological Resources	3.5 Historic & Cultural	3.6 & 3.7 Air Quality-GHG-Climate Change	3.8 Solid waste-Hazardous Materials	3.9 Health & Human Safety	3.10 Utilities	3.11 Transportation	3.12 Noise-Vibration	3.13 Visual Effects - Community Character	3.14 Community Facilities, Open Space, Recreation	3.15 Socioeconomic	3.16 Environmental Justice	4.0 Cumulative Effects	5.0 Public Review - Procedural	6.0 General Comments (support & opposition)	Email	submitted via		
8/8/2025	Crotty, Angelica							X	X		X	X		X										dabydibi@aol.com	email		
8/8/2025	D, Mg.						X	X	X		X	X	X	X	X				X	X		X			rekced@duck.com	email	
8/8/2025	Danzing, Rachel						X	X	X		X	X	X	X	X				X	X		X			rachdanzing@yahoo.com	email	
8/8/2025	Davidowitz, Ruth						X	X	X		X	X	X	X	X				X	X		X			ruthdavidowitz@gmail.com	email	
8/8/2025	DeFeo, Doug						X	X	X		X	X	X	X	X				X	X		X			dougdefeo@optonline.net	email	
8/8/2025	Delardi, Nia						X	X	X		X	X	X	X	X				X	X		X			06hermionejr@gmail.com	email	
8/8/2025	DeVecchio, Allison						X	X	X		X	X	X	X	X				X	X		X			allisondevecchio24@gmail.com	email	
8/8/2025	Ditizio, Vincent						X	X	X		X	X	X	X	X				X	X		X			theapocalypsewith@gmail.com	email	
8/8/2025	Everitt, Anthony						X	X	X		X	X	X	X	X				X	X		X			anthonyeveritt77@yahoo.com	email	
8/8/2025	Farmer, Susan						X	X	X		X	X	X	X	X				X	X		X			fbby145@outlook.com	email	
8/8/2025	Ferrante, Caitlin						X	X	X		X	X	X	X	X				X	X		X			caitlin.ferrante@sierraclub.org	email	
8/8/2025	Ferris, Dianne						X	X	X		X	X	X	X	X				X	X		X			df14@cornell.edu	email	
8/8/2025	Ford, Susan						X	X	X		X	X	X	X	X				X	X		X			fords208@gmail.com	email	
8/8/2025	Frank, Michaela						X	X	X		X	X	X	X	X				X	X		X			frank2416m@gmail.com	email	
8/8/2025	Freeman, Beth						X	X	X		X	X	X	X	X				X	X		X			bethjane1220@netscape.net	email	
8/8/2025	Friedman, David										X			X											dubbab@aol.com	email	
8/8/2025	Gaertner, Diane						X	X	X		X	X	X	X	X				X	X		X			sg719@gmail.com	email	
8/8/2025	Gagnon, Christopher						X	X	X		X	X	X	X	X				X	X		X			madmoxiem@gmail.com	email	
8/8/2025	Gaines, Nora						X	X	X		X	X	X	X	X				X	X		X			noracgaines@gmail.com	email	
8/8/2025	Gallagher, Sarah						X	X	X		X	X	X	X	X				X	X		X			uppergreenside@gmail.com	email	
8/8/2025	Gelfer, Michael						X	X	X		X	X	X	X	X				X	X		X			mikereregina_204@comcast.net	email	
8/8/2025	Giletto, Lizabeth						X	X	X		X	X	X	X	X				X	X		X			lzkeeferyc@gmail.com	email	
8/8/2025	Gillen, William						X	X	X		X	X	X	X	X				X	X		X			wpatgillen@gmail.com	email	
8/8/2025	Gioia, Philip						X	X	X		X	X	X	X	X				X	X		X			dgioia@verizon.net	email	
8/8/2025	Glick, Madeleine						X	X	X		X	X	X	X	X				X	X		X			jgrdnutrition@yahoo.com	email	
8/8/2025	Goetz, Robert						X	X	X		X	X	X	X	X				X	X		X			mandysdaddy2003@gmail.com	email	
8/8/2025	Gordineer, Karine						X	X	X		X	X	X	X	X				X	X		X			karine13@optonline.net	email	
8/8/2025	Gross, Jim						X	X	X		X	X	X	X	X				X	X		X			jimg1127@gmail.com	email	
8/8/2025	Gutheil, Lisa						X	X	X		X	X	X	X	X				X	X		X			lgutheil@gmail.com	email	
8/8/2025	Guyon, Pamela						X	X	X		X	X	X	X	X				X	X		X			singer1013@yahoo.com	email	
8/8/2025	Gyory, Randy						X	X	X		X	X	X	X	X				X	X		X			rgyory@ptd.net	email	
8/8/2025	Hagar-Smith, Renee						X	X	X		X	X	X	X	X				X	X		X			renehagarsmith@gmail.com	email	
8/8/2025	Hajdufi, Danielle						X	X	X		X	X	X	X	X				X	X		X			peagreen50s@yahoo.com	email	
8/8/2025	Hale, Melery											X	X												MailArieHale@gmail.com	email	
8/8/2025	Hale, Melery											X	X												MailArieHale@gmail.com	email	
8/8/2025	Hale, Melery							X														X			MailArieHale@gmail.com	email	
8/8/2025	Hale, Melery							X	X																MailArieHale@gmail.com	email	
8/8/2025	Hall, Cody						X	X	X		X	X	X	X	X				X	X		X			coryrose84@aol.com	email	
8/8/2025	Hannon, Kathleen						X	X	X		X	X	X	X	X				X	X		X			katehannon@yahoo.com	email	
8/8/2025	Hansel, Bettina						X	X	X		X	X	X	X	X				X	X		X			bghansel@aol.com	email	
8/8/2025	Healy, Conor						X	X	X		X	X	X	X	X				X	X		X			conor.patrick.healy@gmail.com	email	
8/8/2025	Hoggan, Jenna						X	X	X		X	X	X	X	X				X	X		X			jennaann127@gmail.com	email	
8/8/2025	Howland, Bill	Snow Owls Club President															X										email
8/8/2025	Jackson, K. Julianne						X	X	X		X	X	X	X	X				X	X		X			rdjackson@aol.com	email	
8/8/2025	Jerome, Russell	Jerome Fire Equipment Co., Inc.						X			X	X	X														email/attach
8/8/2025	Johnson, Jamie						X	X	X		X	X	X	X	X				X	X		X			jamiejohnsonnyc@gmail.com	email	
8/8/2025	Jones, Bob						X	X	X		X	X	X	X	X				X	X		X			robertj47@proton.me	email	
8/8/2025	Keem, Donna						X	X	X		X	X	X	X	X				X	X		X			djkeem@hotmail.com	email	
8/8/2025	Kellogg, Syd						X	X	X		X	X	X	X	X				X	X		X			sydthekid521@gmail.com	email	
8/8/2025	Klee, Gary						X	X	X		X	X	X	X	X				X	X		X			kleemeister@aol.com	email	
8/8/2025	Klimpel, Julie						X	X	X		X	X	X	X	X				X	X		X			bwk1@optonline.net	email	
8/8/2025	Kollar, Joseph						X	X	X		X	X	X	X	X				X	X		X			joseph.kollar1@verizon.net	email	
8/8/2025	Kollar, Judy						X	X	X		X	X	X	X	X				X	X		X			joseph.kollar1@verizon.net	email	
8/8/2025	Kornreich, David						X	X	X		X	X	X	X	X				X	X		X			dbkornrei@gmail.com	email	
8/8/2025	Kotchmar, James						X	X	X		X	X	X	X	X				X	X		X			jkotch2003@yahoo.com	email	
8/8/2025	Koza, Nadine						X	X	X		X	X	X	X	X				X	X		X			nkosf@verizon.net	email	
8/8/2025	Kragh, Sonia	Dewitt Advisory Conservation Commission					X	X			X	X		X	X					X					sykragh@yahoo.com	email/attach	
8/8/2025	Lathrop, Donald						X	X	X		X	X	X	X	X				X	X		X			dlathrop@berkshirecc.edu	email	
8/8/2025	Latino-Gerlock, Tiffany	MACNY																				X			tlatino@gerlock.com	email	
8/8/2025	Lawrence, George							X																	lslaw1963@gmail.com	email	
8/8/2025	Lawrence, George																		X						lslaw1963@gmail.com	email	
8/8/2025	Lawrence, Leslie								X		X														lslaw1963@gmail.com	email	
8/8/2025	Lawrence, Leslie						X	X	X		X	X	X	X	X				X	X		X			lslaw1963@gmail.com	email	
8/8/2025	Lenk, Vivienne						X	X	X		X	X	X	X	X				X	X		X			lenkv1@aol.com	email	
8/8/2025	Levernosh, Elizabeth							X			X			X			X								elevernosh@aol.com	email	
8/8/2025	Lipson, Daniel						X	X	X		X	X	X	X	X				X	X		X			dnlipson@gmail.com	email	
8/8/2025	Lowitt, Ellen						X	X	X		X	X	X	X	X				X	X		X			lowe734@gmail.com	email	
8/8/2025	Lynch, Barbara						X	X	X		X	X	X	X	X				X	X		X			bd5@cornell.edu	email	
8/8/2025	Marcus, Jill M.						X	X	X		X	X	X	X	X				X	X		X			jill.marcus64@gmail.com	email	
8/8/2025	Marczyk, Cathy						X	X	X		X	X	X	X	X				X	X		X			roncat1978@outlook.com	email	
8/8/2025	Marks, Eva						X	X	X		X	X	X	X	X				X	X		X			evamcra@hotmail.com	email	

Date	Name	Representing	AGENCY	1.1 Purpose & Need	2.0 Proposed Action & Alternatives	3.1 Land Use - Zoning	3.2 Geology-Soils-Topography	3.3 Water Resources	3.4 Biological Resources	3.5 Historic & Cultural	3.6 & 3.7 Air Quality-GHG-Climate Change	3.8 Solid waste-Hazardous Materials	3.9 Health & Human Safety	3.10 Utilities	3.11 Transportation	3.12 Noise-Vibration	3.13 Visual Effects - Community Character	3.14 Community Facilities, Open Space, Recreation	3.15 Socioeconomic	3.16 Environmental Justice	4.0 Cumulative Effects	5.0 Public Review - Procedural	6.0 General Comments (support & opposition)	Email	submitted via	
8/8/2025	Marsh, Cornelia						X	X	X		X	X	X	X	X				X	X		X		conniemarsh6@gmail.com	email	
8/8/2025	Martin, Ben						X	X	X		X	X	X	X	X				X	X		X		bendicoot@yahoo.com	email	
8/8/2025	Matteson, Patricia						X	X	X		X	X	X	X	X				X	X		X		vlyhome@yahoo.com	email	
8/8/2025	McBrown, Shaeril						X	X	X		X	X	X	X	X				X	X		X		cutiepastaf28@gmail.com	email	
8/8/2025	McCall, Laurie						X	X	X		X	X	X	X	X				X	X		X		lmcalls57@icloud.com	email	
8/8/2025	McCloskey, Cynde						X	X	X		X	X	X	X	X				X	X		X		cynde6@juno.com	email	
8/8/2025	McCord, Carol						X	X	X		X	X	X	X	X				X	X		X		carolm@fastmail.com	email	
8/8/2025	McGowan, Lea						X	X	X		X	X	X	X	X				X	X		X		lea.mcgowan@gmail.com	email	
8/8/2025	McKenley, Cillon						X	X	X		X	X	X	X	X				X	X		X		csbmck@netscape.net	email	
8/8/2025	Menter, Daniel						X	X	X		X	X	X	X	X				X	X		X		dan.menter@yahoo.com	email	
8/8/2025	Meyers, Paul						X	X	X		X	X	X	X	X				X	X		X		paulclarkmeyers@gmail.com	email	
8/8/2025	Michel, Tonya						X	X	X		X	X	X	X	X				X	X		X		tojorn70@yahoo.com	email	
8/8/2025	Miller, Linda						X	X	X		X	X	X	X	X				X	X		X		lmemiller@yahoo.com	email	
8/8/2025	Miracola, Jessica						X	X	X		X	X	X	X	X				X	X		X		nibbles-abettor0w@icloud.com	email	
8/8/2025	Monostory, Leslie							X				X	X	X					X				X		fishbugm5@twcnry.rr.com	email
8/8/2025	Morales, Annajean						X	X	X		X	X	X	X	X				X	X		X		annajean@yahoocom	email	
8/8/2025	Mufson, Susan						X	X	X		X	X	X	X	X				X	X		X		suatmuf@gmail.com	email	
8/8/2025	Mugdan, Elana						X	X	X		X	X	X	X	X				X	X		X		lenkv1@aol.com	email	
8/8/2025	Mulder, James						X	X	X		X	X	X	X	X				X	X		X		jmulder@aol.com	email	
8/8/2025	Muller, Erick						X	X	X		X	X	X	X	X				X	X		X		erickmuller2@aol.com	email	
8/8/2025	Nanos, Sharon						X	X	X		X	X	X	X	X				X	X		X		lists@rnanos.me	email	
8/8/2025	Natkins, Judith						X	X	X		X	X	X	X	X				X	X		X		jnatkins@yahoo.com	email	
8/8/2025	Nelson, Anne						X	X	X		X	X	X	X	X				X	X		X		doghappy33@hotmail.com	email	
8/8/2025	Nelson, Miranda						X	X	X		X	X	X	X	X				X	X		X		mirandabnelson@gmail.com	email	
8/8/2025	Oswego County Legislature		X					X				X												Jessica.Davern@OswegoCounty.com	email/att	
8/8/2025	Otto, Dale						X	X	X		X	X	X	X	X				X	X		X		ottoonematic@gmail.com	email	
8/8/2025	Packer, Patti						X	X	X		X	X	X	X	X				X	X		X		pattiac@nycap.rr.com	email	
8/8/2025	Pasch, Lisa						X	X	X		X	X	X	X	X				X	X		X		paschl@hotmail.com	email	
8/8/2025	Pelzman, Julie						X	X	X		X	X	X	X	X				X	X		X		juliepelzman@hotmail.com	email	
8/8/2025	Peters, Paula			X			X		X							X							X		squarrelgirl547@outlook.com	email
8/8/2025	Pirouz, Kamrava						X	X	X		X	X	X	X	X				X	X		X		kamravap@vt.edu	email	
8/8/2025	Pleskach, Ryan	Town of Clay Town Board	X					X				X			X	X		X					X		rpleskach@townofclay.org	email/att
8/8/2025	Polvere Fred, Polvere, Natalie						X	X	X		X	X	X	X	X				X	X		X		polverenatalie@gmail.com	email	
8/8/2025	Porder, Deborah						X	X	X		X	X	X	X	X				X	X		X		dporder@gmail.com	email	
8/8/2025	Proctor, Chris						X	X	X		X	X	X	X	X				X	X		X		chrisproctorh@gmail.com	email	
8/8/2025	Prybylski, John						X	X	X		X	X	X	X	X				X	X		X		jprybs46@yahoo.com	email	
8/8/2025	Raven, Jackie						X	X	X		X	X	X	X	X				X	X		X		jackie_raven@hotmail.com	email	
8/8/2025	Rios, Judy	Town of Clay	X								X	X			X									jrios@townofclay.org	email/att	
8/8/2025	Rivers, Jerry							X	X		X	X		X										jerry.rivers13@yahoo.com	email	
8/8/2025	Robinson, Jill							X			X		X		X				X			X		jilr1017@gmail.com	email	
8/8/2025	Robinson, Jill and Richard						X	X	X		X	X	X	X	X				X	X		X		jilr1017@gmail.com	email	
8/8/2025	Roemer, Joel						X	X	X		X	X	X	X	X				X	X		X		jroemer9597@gmail.com	email	
8/8/2025	Rogers, Michelle						X	X	X		X	X	X	X	X				X	X		X		bombshe173@yahoo.com	email	
8/8/2025	Rose, Robert						X	X	X		X	X	X	X	X				X	X		X		hannibal.kuvasz@gmail.com	email	
8/8/2025	Rouleau, Kyle Nicholay																									US mail
8/8/2025	Rovedo, Nivo						X	X	X		X	X	X	X	X				X	X		X		rovedonivo@optonline.net	email	
8/8/2025	Rumayor, Rebeca						X	X	X		X	X	X	X	X				X	X		X		beckyrumayor@gmail.com	email	
8/8/2025	Russo, Sylvie						X	X	X		X	X	X	X	X				X	X		X		nouerrusso@aol.com	email	
8/8/2025	Scanlon, Joanne						X	X	X		X	X	X	X	X				X	X		X		jscanlon62@gmail.com	email	
8/8/2025	Schmeierer, Terrie						X	X	X		X	X	X	X	X				X	X		X		terrieann.schmeierer@icloud.com	email	
8/8/2025	Schmitthener, Christine						X	X	X		X	X	X	X	X				X	X		X		chriswhf@yahoo.com	email	
8/8/2025	Schwarzlander, Harry, Schwarzlander, Patricia						X	X	X		X	X	X	X	X				X	X		X		pcs@tigerbunny.com	email	
8/8/2025	Scott, G. Eric						X	X	X		X	X	X	X	X				X	X		X		void-oatmeal0q@icloud.com	email	
8/8/2025	Sheehan, Maryellen							X				X	X										X		farmermaryellen@gmail.com	email
8/8/2025	Sheridan, John						X	X	X		X	X	X	X	X				X	X		X		johnsheridan@gmail.com	email	
8/8/2025	Siegel, Lenny	Center for Public Environmental Oversight						X			X	X	X						X					lsiegel@cpeo.org	email/attach	
8/8/2025	Singer, Janice						X	X	X		X	X	X	X	X				X	X		X		janingsinger895@gmail.com	email	
8/8/2025	Smith, Janis						X	X	X		X	X	X	X	X				X	X		X		janis195752@yahoo.com	email	
8/8/2025	Spencer, Taylor						X	X	X		X	X	X	X	X				X	X		X		trs418@aol.com	email	
8/8/2025	Sperbeck, Elaine						X	X	X		X	X	X	X	X				X	X		X		ejsperbeck@yahoo.com	email	
8/8/2025	Stedje, Deborah						X	X	X		X	X	X	X	X				X	X		X		djstedje@gmail.com	email	
8/8/2025	Steiner, A.L.						X	X	X		X	X	X	X	X				X	X		X		asteinerny@gmail.com	email	
8/8/2025	Stoeltje, Sam						X	X	X		X	X	X	X	X				X	X		X		sstoeltje@gmail.com	email	
8/8/2025	Sutton, Kadjah	EarthJustice																						ksutton@earthjustice.org	email	
8/8/2025	Swartz, Tami						X	X	X		X	X	X	X	X				X	X		X		tamiswartz@gmail.com	email	
8/8/2025	Talentino, Arnold						X	X	X		X	X	X	X	X				X	X		X		talentino@courtlad.edu	email	
8/8/2025	Tanner, Elizabeth						X	X	X		X	X	X	X	X				X	X		X		wildchild13@yahoo.com	email	
8/8/2025	Tether, Alicia						X	X	X		X	X	X	X	X				X	X		X		astether@verizon.net	email	
8/8/2025	Tignanello, Doreen						X	X	X		X	X	X	X	X				X	X		X		doreentig@aol.com	email	
8/8/2025	Tingley, Derrick						X	X	X		X	X	X	X	X				X	X		X		ericktingley@yahoo.com	email	
8/8/2025	Topp, Krista						X	X	X		X	X	X	X	X				X	X		X		ktopp@stry.rr.com	email	
8/8/2025	Tussing, Katharine						X	X	X		X	X	X	X	X				X	X		X		kathytussing@yahoo.com	email	

Date	Name	Representing	AGENCY	1.1 Purpose & Need	2.0 Proposed Action & Alternatives	3.1 Land Use - Zoning	3.2 Geology-Soils-Topography	3.3 Water Resources	3.4 Biological Resources	3.5 Historic & Cultural	3.6 & 3.7 Air Quality-GHG-Climate Change	3.8 Solid waste-Hazardous Materials	3.9 Health & Human Safety	3.10 Utilities	3.11 Transportation	3.12 Noise-Vibration	3.13 Visual Effects - Community Character	3.14 Community Facilities, Open Space, Recreation	3.15 Socioeconomic	3.16 Environmental Justice	4.0 Cumulative Effects	5.0 Public Review - Procedural	6.0 General Comments (support & opposition)	Email	submitted via	
8/8/2025	Twomey, Cristalle						X	X	X		X	X	X	X	X				X	X		X		christalletwomey@gmail.com	email	
8/8/2025	Ubrico, Laura							X	X		X	X	X	X										las7997@aol.com	email	
8/8/2025	Valentine, Jennifer						X	X	X		X	X	X	X					X	X		X		faboo1028@gmail.com	email	
8/8/2025	Varon, Joseph						X	X	X		X	X	X	X					X	X		X		jvaron613@aol.com	email	
8/8/2025	Visconti, Kyle			X					X					X									X	kjrich171@gmail.com	email	
8/8/2025	Wackett, Evelyn						X	X	X		X	X	X	X					X	X		X		even8r@yahoo.com	email	
8/8/2025	Walker, Nora						X	X	X		X	X	X	X					X	X		X		nowalk54@gmail.com	email	
8/8/2025	Walkowicz, Helene						X	X	X		X	X	X	X					X	X		X		cowling_excess_5j@icloud.com	email	
8/8/2025	Weinberg, Patti						X	X	X		X	X	X	X					X	X		X		pattw175@msn.com	email	
8/8/2025	Weis, Judith						X	X	X		X	X	X	X					X	X		X		jweis@newark.rutgers.edu	email	
8/8/2025	Wheaton, Alfred						X	X	X		X	X	X	X					X	X		X		alfie1_@hotmail.com	email	
8/8/2025	Younger, Kristinia						X	X	X		X	X	X	X					X	X		X		key12061@gmail.com	email	
8/8/2025	Zackrone, Alex						X	X	X		X	X	X	X					X	X		X		sealexonly@aol.com	email	
8/8/2025	Zinn, Andrea						X	X	X		X	X	X	X					X	X		X		andrea_zinn050@aol.com	email	
8/9/2025	Aitchison, Jocelyn						X	X	X		X	X	X	X					X	X		X		jocelyn.aitchison@gmail.com	email	
8/9/2025	Bartholomew						X	X	X		X	X	X	X					X	X		X		carbar994@gmail.com	email	
8/9/2025	Becker, Serena						X	X	X		X	X	X	X					X	X		X		serenabecker@gmail.com	email	
8/9/2025	Berkon, Marilyn						X	X	X		X	X	X	X					X	X		X		marbkn@aol.com	email	
8/9/2025	Best, Lorraine						X	X	X		X	X	X	X					X	X		X		larab@usa.com	email	
8/9/2025	Beutel, Teresa						X	X	X		X	X	X	X					X	X		X		teresabeutel@hotmail.com	email	
8/9/2025	Bickom, Hannah						X	X	X		X	X	X	X					X	X		X		hbickom@gmail.com	email	
8/9/2025	Bloom, Jane						X	X	X		X	X	X	X					X	X		X		jbloom507@gmail.com	email	
8/9/2025	Braunstein, Jack						X	X	X		X	X	X	X					X	X		X		jackbraunstein100@gmail.com	email	
8/9/2025	Brown-Newball, Thylais						X	X	X		X	X	X	X					X	X		X		tnadji@gmail.com	email	
8/9/2025	Bryant, Frank						X	X	X		X	X	X	X					X	X		X		fbryant@optonline.net	email	
8/9/2025	Buttny, Richard						X	X	X															rbuttny@syr.edu	email	
8/9/2025	Cahl-Hoy, Lynn						X	X	X		X	X	X	X					X	X		X		lcayhillhoy@twcny.rr.com	email	
8/9/2025	Canino, Marjorie			X		X																	X	marjbsn@aol.com	email	
8/9/2025	Canino, Tracey							X						X									X	one_ocklock_fox@yahoo.com	email	
8/9/2025	Canino, Tracey							X						X									X	one_ocklock_fox@yahoo.com	email	
8/9/2025	Carney, Mary						X	X	X		X	X	X	X					X	X		X		mary.e.carney@gmail.com	email	
8/9/2025	Chapman, Brenda						X	X	X		X	X	X	X					X	X		X		red22chap@gmail.com	email	
8/9/2025	Curtin, Doreen						X	X	X		X	X	X	X					X	X		X		judyol1@yahoo.com	email	
8/9/2025	D., Liz						X	X	X		X	X	X	X					X	X		X		lizgospel@yahoo.com	email	
8/9/2025	Daniel, C.						X	X	X		X	X	X	X					X	X		X		05-hugs.latch@icloud.com	email	
8/9/2025	Darice, Chandra						X	X	X		X	X	X	X					X	X		X		chandra_nyc@hotmail.com	email	
8/9/2025	Demeter, Mike	Immanuel Evangelical Church of Clay, Council President									X			X		X								mgdemeter@gmail.com	email	
8/9/2025	Dillman, George						X	X	X		X	X	X	X					X	X		X		gdthre@yaho.com	email	
8/9/2025	Downing, Kathryn						X	X	X		X	X	X	X					X	X		X		ksimmons@gmail.com	email	
8/9/2025	Downing, Summer						X	X	X		X	X	X	X					X	X		X		summers808@gmail.com	email	
8/9/2025	Eigo, Jim						X	X	X		X	X	X	X					X	X		X		jmeigo@aol.com	email	
8/9/2025	Fischman, Roy						X	X	X		X	X	X	X					X	X		X		ropaf@aol.com	email	
8/9/2025	Friedman, Judy																									
8/9/2025	Galvano, Clara						X	X	X		X	X	X	X					X	X		X		eclair09@hotmail.com	email	
8/9/2025	Gedicks, Winston					X		X			X	X		X		X								wcgedicks@gmail.com	email	
8/9/2025	Halloran, Susan						X	X	X		X	X	X	X					X	X		X		sjhalloran@yahoo.com	email	
8/9/2025	Hammer, Julie																						X	jhammer7136@gmail.com	email	
8/9/2025	Hammer, Julie							X															X	jhammer7136@gmail.com	email	
8/9/2025	Herb, Christine						X	X	X		X	X	X	X					X	X		X		beabeaconoflove@gmail.com	email	
8/9/2025	Hollywood, Michael						X	X	X		X	X	X	X					X	X		X		mihollywood@hotmail.com	email	
8/9/2025	Horowitz, Jen						X	X	X		X	X	X	X					X	X		X		jenhorowitz3@gmail.com	email	
8/9/2025	Jaskowitz, Rita						X	X	X		X	X	X	X					X	X		X		rtajaskowitz@yahoo.com	email	
8/9/2025	Joiner, Dorothy						X	X	X		X	X	X	X					X	X		X		dorpj@msn.com	email	
8/9/2025	Jones, Chris						X	X	X		X	X	X	X					X	X		X		coolvibnyc@gmail.com	email	
8/9/2025	Kastner, John						X	X	X		X	X	X	X					X	X		X		johnkastner49@gmail.com	email	
8/9/2025	Keavey, Karen						X	X	X		X	X	X	X					X	X		X		karenkeavey@gmail.com	email	
8/9/2025	Kellogg, Syd						X	X	X		X	X	X	X					X	X		X		sydthekid521@gmail.com	email	
8/9/2025	Kienzi, Oliver						X	X	X		X	X	X	X					X	X		X		oliver_kienzi@hotmail.com	email	
8/9/2025	Klosterman, Pete						X	X	X		X	X	X	X					X	X		X		pete_k@pacbell.net	email	
8/9/2025	Knaack, Dennis						X	X	X		X	X	X	X					X	X		X		knaackdennis@yahoo.com	email	
8/9/2025	Kramer, Sally						X	X	X		X	X	X	X					X	X		X		sally.m.kramer@gmail.com	email	
8/9/2025	Lawrence, George													X										lelaw@twcny.rr.com	email	
8/9/2025	Lawrence, Leslie							X				X	X											lelaw@twcny.rr.com	email	
8/9/2025	Lawrence, Leslie																		X					lelaw@twcny.rr.com	email	
8/9/2025	Lenthall, Kate						X	X	X		X	X	X	X					X	X		X		tiredqueer@duck.com	email	
8/9/2025	Lieblein, Judy						X	X	X		X	X	X	X					X	X		X		judylieblen@hotmail.com	email	
8/9/2025	Long, Jim						X	X	X		X	X	X	X					X	X		X		p.jlong@earthlink.net	email	
8/9/2025	Malach, Andrea						X	X	X		X	X	X	X					X	X		X		armalach@gmail.com	email	
8/9/2025	Malik, Laila						X	X	X		X	X	X	X					X	X		X		lailtamalik@aol.com	email	
8/9/2025	Mandigo, Richard						X	X	X		X	X	X	X					X	X		X		richmanr1@yahoo.com	email	
8/9/2025	Marinilli, Jennifer						X	X	X		X	X	X	X					X	X		X		jmarinilli@frontiernet.net	email	

Date	Name	Representing	AGENCY	1.1 Purpose & Need	2.0 Proposed Action & Alternatives	3.1 Land Use - Zoning	3.2 Geology-Soils-Topography	3.3 Water Resources	3.4 Biological Resources	3.5 Historic & Cultural	3.6 & 3.7 Air Quality-GHG-Climate Change	3.8 Solid waste-Hazardous Materials	3.9 Health & Human Safety	3.10 Utilities	3.11 Transportation	3.12 Noise-Vibration	3.13 Visual Effects - Community Character	3.14 Community Facilities, Open Space, Recreation	3.15 Socioeconomic	3.16 Environmental Justice	4.0 Cumulative Effects	5.0 Public Review - Procedural	6.0 General Comments (support & opposition)	Email	submitted via	
8/9/2025	Mclaughlin, Susan						X	X	X		X	X	X	X	X				X	X		X		suzzymryc@gmail.com	email	
8/9/2025	Mcloughlin, Carol						X	X	X		X	X	X	X	X				X	X		X		themclcats@gmail.com	email	
8/9/2025	Morrell, Diane						X	X	X		X	X	X	X	X				X	X		X		jmorrell5@verizon.net	email	
8/9/2025	Mueller, Abigail						X	X	X		X	X	X	X	X				X	X		X		abigailmueller@yahoo.com	email	
8/9/2025	Muok, Gwendolyn	Pres. NAACP, Syracuse-Onondaga County						X		X					X	X				X				syraaacpprez@gmail.com	email/att	
8/9/2025	Naumovitz, Debra						X	X	X		X	X	X	X	X				X	X		X		psychopractor@aol.com	email	
8/9/2025	Nielsen, Douglas						X	X	X		X	X	X	X	X				X	X		X		doungai47@yahoo.com	email	
8/9/2025	Nolling, Sharon						X	X	X		X	X	X	X	X				X	X		X		sharonnolling1@gmail.com	email	
8/9/2025	PACNY	Preservation Association of NY				X				X														email@pacny.net	email/att	
8/9/2025	Parko, Drew						X	X	X		X	X	X	X	X				X	X		X		dparko@ppln.com	email	
8/9/2025	Parsons, Araby						X	X	X		X	X	X	X	X				X	X		X		arabie06@gmail.com	email	
8/9/2025	Peters, Bob			X										X					X				X	sretepob@yahoo.com	email	
8/9/2025	Peters, Robert			X										X					X				X	sretepob@outlook.com	email	
8/9/2025	Price, Charlee Ray						X	X	X		X	X	X	X	X				X	X		X		charleeray@hotmail.com	email	
8/9/2025	Purcell, Katie						X	X	X		X	X	X	X	X				X	X		X		kmprcrl555@gmail.com	email	
8/9/2025	Purcell, Katie				X			X	X		X	X	X											kmprcrl555@gmail.com	email	
8/9/2025	Ramsden, Anne						X	X	X		X	X	X	X	X				X	X		X		ramsdenan@gmail.com	email	
8/9/2025	Reukauf, Barbara						X	X	X		X	X	X	X	X				X	X		X		reubarb53@verizon.net	email	
8/9/2025	Rosenfeld, David						X	X	X		X	X	X	X	X				X	X		X		dvdfr6314@gmail.com	email	
8/9/2025	Rutigliano, Mallory						X	X	X		X	X	X	X	X				X	X		X		mwrutigliano@gmail.com	email	
8/9/2025	Sarnacki, Mark						X	X	X		X	X	X	X	X				X	X		X		ironmark500@yahoo.com	email	
8/9/2025	Schimmel, Amy						X	X	X		X	X	X	X	X				X	X		X		mythandritual@mac.com	email	
8/9/2025	Shawver, James						X	X	X		X	X	X	X	X				X	X		X		jshawver@mac.com	email	
8/9/2025	Slattery, Deborah						X	X	X		X	X	X	X	X				X	X		X		mainething04@aol.com	email	
8/9/2025	Smith, Anthony						X	X	X		X	X	X	X	X				X	X		X		atsmith48@twc.com	email	
8/9/2025	Smith, Christian						X	X	X		X	X	X	X	X				X	X		X		csmith.smith352@gmail.com	email	
8/9/2025	Stout, Rowan						X	X	X		X	X	X	X	X				X	X		X		rubym2005@gmail.com	email	
8/9/2025	tatasage						X	X	X		X	X	X	X	X				X	X		X		tatasage@gmail.com	email	
8/9/2025	Thomas, Karen						X	X	X		X	X	X	X	X				X	X		X		ktcatlover@verizon.net	email	
8/9/2025	Uttech, Mary						X	X	X		X	X	X	X	X				X	X		X		beaverholow@frontier.net	email	
8/9/2025	Veale, Brigid						X	X	X		X	X	X	X	X				X	X		X		brigidveale@yahoo.com	email	
8/9/2025	Veza, Renee						X	X	X		X	X	X	X	X				X	X		X		rvilone@aol.com	email	
8/9/2025	victoriaheaterarts						X	X	X		X	X	X	X	X				X	X		X		victoriaheaterarts@gmail.com	email	
8/9/2025	Vitale, Barbara						X	X	X		X	X	X	X	X				X	X		X		bcbrez@msn.com	email	
8/9/2025	Wallace, Diane						X	X	X		X	X	X	X	X				X	X		X		dhw810@gmail.com	email	
8/9/2025	Ward, Nancy						X	X	X		X	X	X	X	X				X	X		X		nancyward520@gmail.com	email	
8/9/2025	Wilson, Rose Marie						X	X	X		X	X	X	X	X				X	X		X		rmwilson32@gmail.com	email	
8/9/2025	Yost, Wendy						X	X	X		X	X	X	X	X				X	X		X		wyost@verizon.net	email	
8/9/2025	Yost, Wendy							X																wyost@verizon.net	email	
8/10/2025	Arno, Iris						X	X	X		X	X	X	X	X				X	X		X		hisk37@gmail.com	email	
8/10/2025	Beyer, Mark						X	X	X		X	X	X	X	X				X	X		X		mbeyer55@gmail.com	email	
8/10/2025	Bhattacharya, Tripti						X	X				X	X									X		Bhattacharya.Tripti@gmail.com	email	
8/10/2025	Brown, Maurice																		X					Maurice.r.brown@gmail.com	email	
8/10/2025	Buske, Chad																		X					chadmbuske2@icloud.com	email	
8/10/2025	Castricone, Felicia						X	X	X		X	X	X	X	X				X	X		X		castriconef@yahoo.com	email	
8/10/2025	Cockett, Nancy						X	X	X		X	X	X	X	X				X	X		X		ncockett@gmail.com	email	
8/10/2025	Coffin, Lucinda							X	X					X	X				X					lucinda.coffin@gmail.com	email	
8/10/2025	Coffin, Lucinda						X	X	X		X	X	X	X	X				X	X		X		lucinda.coffin@gmail.com	email	
8/10/2025	Dannible, Christy							X	X		X	X	X	X	X								X	copydiva58@gmail.com>	email	
8/10/2025	Denton, Elaine						X	X	X		X	X	X	X	X				X	X		X		elainementon@gmail.com	email	
8/10/2025	Denton, Matthew																		X			X		matt@mdbitz.com	email	
8/10/2025	Drechsler, Jacquelyn						X	X	X		X	X	X	X	X				X	X		X		jacquifute456@gmail.com	email	
8/10/2025	Duva-Sprague, Echo											X								X				eduva2@yahoo.com	email	
8/10/2025	Elter, Tom										X												X			email
8/10/2025	Federman, Barbara						X	X	X		X	X	X	X	X				X	X		X		bfliny@aol.com		
8/10/2025	Felleman, John	Professor Emeritus SUNY-ESF						X			X	X												jfelleman@gmail.com	email/att	
8/10/2025	Fergusson, Brady						X	X	X		X	X	X	X	X				X	X		X		brady585@gmail.com	email	
8/10/2025	Gason, Julia						X	X	X		X	X	X	X	X				X	X		X		gansonjulii@gmail.com	email	
8/10/2025	Gomez, Maria						X	X	X		X	X	X	X	X				X	X		X		maria270@msn.com	email	
8/10/2025	Gormley, Ethan						X	X	X		X	X	X	X	X				X	X		X		ethansg@hotmail.com	email	
8/10/2025	Granatstein, Judy						X	X	X		X	X	X	X	X				X	X		X		judygran50@gmail.com	email	
8/10/2025	Griffin, Glenn			X	X				X		X	X	X	X	X			X	X					griffinglenn77@gmail.com	email	
8/10/2025	Griffin, Shirley							X				X	X	X	X			X	X					shirleygriffinmail@gmail.com	email	
8/10/2025	Haas, Karen	Sterling Water Stewards					X	X																mnyblade21@gmail.com>	Email	
8/10/2025	Haney, Jonathan						X	X	X		X	X	X	X	X				X	X		X		haney.jonathan@gmail.com	email	
8/10/2025	Harcourt, Emily							X			X	X			X									emharcourt@gmail.com>	email	
8/10/2025	Harrel-DeLamater, Lisa						X	X	X		X	X	X	X	X				X	X		X		isaharrdel@gmail.com	email	
8/10/2025	Helling, Tom						X	X	X		X	X	X	X	X				X	X		X		tom.helling@gmail.com	email	
8/10/2025	Hinkelman, Carol						X	X	X		X	X	X	X	X				X	X		X		carolhroc@gmail.com	email	
8/10/2025	Johnson, Mark						X	X	X		X	X	X	X	X				X	X		X		nirnar@mindspring.com	email	
8/10/2025	Kazmirski, AnnMarie							X				X			X	X							X	AMK-MLP@twcny.rr.com	email	

Date	Name	Representing	AGENCY	1.1 Purpose & Need	2.0 Proposed Action & Alternatives	3.1 Land Use - Zoning	3.2 Geology-Soils-Topography	3.3 Water Resources	3.4 Biological Resources	3.5 Historic & Cultural	3.6 & 3.7 Air Quality-GHG-Climate Change	3.8 Solid waste-Hazardous Materials	3.9 Health & Human Safety	3.10 Utilities	3.11 Transportation	3.12 Noise-Vibration	3.13 Visual Effects - Community Character	3.14 Community Facilities, Open Space, Recreation	3.15 Socioeconomic	3.16 Environmental Justice	4.0 Cumulative Effects	5.0 Public Review - Procedural	6.0 General Comments (support & opposition)	Email	submitted via
8/10/2025	Keevert, John						X	X	X		X	X	X	X	X				X	X		X		jkeev101@gmail.com	email
8/10/2025	King, Peter	Moving People Transport Coalition									X				X									pking271@pm.me	email/att
8/10/2025	Lawrence, George							X				X		X										lelaw@twcny.rr.com	email
8/10/2025	Lawrence, Leslie							X				X												lelaw1963@gmail.com	email
8/10/2025	Lawrence, Leslie							X	X		X	X	X	X										lelaw1963@gmail.com	email
8/10/2025	Lawson, Alex	Moving People Transportation Coalition									X				X									alexander.m.lawson@gmail.com	email.att
8/10/2025	Lawson, Martha														X				X					martha.lawson279@gmail.com	email
8/10/2025	LeBlanc, Susan							X	X		X	X		X										leblanc.sl@gmail.com	email
8/10/2025	Lippincott, Aura						X	X	X		X	X	X	X	X				X	X				alippinc@gmail.com	email
8/10/2025	Lord, John						X	X	X		X	X	X	X	X				X	X				john.lord@gmail.com	email
8/10/2025	Lynn, Mary						X	X	X		X	X	X	X	X				X	X				kathleenlynnlaw@gmail.com	email
8/10/2025	Matt, Cheryl						X	X	X		X	X	X	X	X				X	X				cmattphotos@gmail.com	email
8/10/2025	Mcfarland-Porter, Theresa						X	X	X		X	X	X	X	X				X	X				tess@rochester.rr.com	email
8/10/2025	Minardi, Christopher							X	X				X		X									christminardi@icloud.com	email
8/10/2025	Montemayor, Lizmarie						X	X	X		X	X	X	X				X						lzma00953@gmail.com	email
8/10/2025	Muck, Gwendolyn	Pres. NAACP, Syracuse-Onondaga County						X		X				X	X					X				synaaccpprez@gmail.com	email/att
8/10/2025	Nyblade, Madeline			X				X			X	X	X			X								mnyblade21@gmail.com	email
8/10/2025	O'Donnell, Any						X	X	X		X	X	X	X	X				X	X				fallenango05@msn.com	email
8/10/2025	O'Reilly, Mary						X	X	X		X	X	X	X	X				X	X				ARLS.O'Reilly@gmail.com	email
8/10/2025	Prowell, Nancy						X	X	X		X	X	X	X	X				X	X				neprowell@gmail.com	email
8/10/2025	Radin, Linda							X	X		X			X										lbradin@twcny.rr.com	email
8/10/2025	Root, Barb						X	X	X		X	X	X	X	X				X	X				broot1@twcny.rr.com	email
8/10/2025	Root, Barb							X	X			X												broot1@twcny.rr.com	email
8/10/2025	Rupert, Mark							X			X			X										markrupert1957@gmail.com	email
8/10/2025	Russell, Craig							X				X		X										csrusse86307@gmail.com	email
8/10/2025	Salerno, Matt							X	X		X	X	X	X					X				X	mattpsalerno@gmail.com	email
8/10/2025	Sarason, Robert													X					X	X				robert.sarason@gmail.com	email
8/10/2025	Saslow, Lori						X	X	X		X	X	X	X	X				X	X				loriasa@msn.com	email
8/10/2025	Schaefer, Matt						X	X	X		X	X	X	X	X				X	X				mschaefer390@gmail.com	email
8/10/2025	Schaem, Suzanne																							suzannems@yahoo.com	email
8/10/2025	Schipper, Caroline													X					X					schipper44@gmail.com	email
8/10/2025	Sheridan, John						X	X			X		X	X	X									johnsheridan@gmail.com	email
8/10/2025	Sherwin, Boyce						X	X	X		X	X	X	X	X				X	X				bsherwin02@yahoo.com	email
8/10/2025	Skolnick, Katharine						X	X	X		X	X	X	X	X				X	X				krs1123@gmail.com	email
8/10/2025	Smith, Mal					X																		mgsmith1000@yahoo.com	email
8/10/2025	Smith, Malcolm						X	X	X		X	X	X	X	X				X	X				mgsmith1000@yahoo.com	email
8/10/2025	Spinanger, Victoria						X	X	X		X	X	X	X	X				X	X				vkspinanger@hotmail.com	email
8/10/2025	Suli, Madison						X	X	X		X	X	X	X	X				X	X				foxyrox443@gmail.com	email
8/10/2025	Vineski, Patricia						X	X	X		X	X	X	X	X				X	X				vineskipatricia@gmail.com	email
8/10/2025	Voelker, Cheryl						X	X	X		X	X	X	X	X				X	X				voelker1234@icloud.com	email
8/10/2025	wilpke50						X	X	X		X	X	X	X	X				X	X				wilpke50@gmail.com	email
8/10/2025	Wolf, Doug													X										doug.wolf.1948@gmail.com	email
8/10/2025	Wolf, Elaine						X	X	X			X	X	X										elainewolf148@gmail.com	email
8/10/2025	Yost, Wendy							X				X	X	X										wyost@verizon.net	email
8/10/2025	Yost, Wendy							X						X										wyost@verizon.net	email
8/10/2025	Yost, Wendy													X					X					wyost@verizon.net	email
8/10/2025	Yost, Wendy							X				X	X	X										wyost@verizon.net	email
8/10/2025	Yost, Wendy						X	X	X		X		X	X					X	X				wyost@verizon.net	email
8/10/2025	Zorn, Tom						X	X	X		X	X	X	X	X				X	X				milestzorn@gmail.com	email
8/11/2025	yamaprints						X	X	X		X	X	X	X	X				X	X				yamaprints@gmail.com	email
8/11/2025	crpolhamus						X	X	X		X	X	X	X	X				X	X				crpolhamus@aol.com	email
8/11/2025	grenardmarkhayduke						X	X	X		X	X	X	X	X				X	X				grenardmarkhayduke@yahoo.com	email
8/11/2025	hhays75						X	X	X		X	X	X	X	X				X	X				hhays75@gmail.com	email
8/11/2025	jezebelfilms@gmail.com						X	X	X		X	X	X	X	X				X	X				jezebelfilms@gmail.com	email
8/11/2025	jhubnette						X	X	X		X	X	X	X	X				X	X				jhubnette@hotmail.com	email
8/11/2025	jquirk66						X	X	X		X	X	X	X	X				X	X				jquirk66@gmail.com	email
8/11/2025	jsmncilns						X	X	X		X	X	X	X	X				X	X				jsmncilns@gmail.com	email
8/11/2025	juliad370						X	X	X		X	X	X	X	X				X	X				juliad370@gmail.com	email
8/11/2025	ktquinlan						X	X	X		X	X	X	X	X				X	X				ktquinlan@gmail.com	email
8/11/2025	menjavi						X	X	X		X	X	X	X	X				X	X				menjavi@gmail.com	email
8/11/2025	probyngregory						X	X	X		X	X	X	X	X				X	X				probyngregory@gmail.com	email
8/11/2025	wen6969						X	X	X		X	X	X	X	X				X	X				wen6969@gmail.com	email
8/11/2025	Adams, Analyse						X	X	X		X	X	X	X	X				X	X				analyseadams@gmail.com	email
8/11/2025	Adams, Analyse						X	X	X		X	X	X	X	X				X	X				analyseadams@gmail.com	email
8/11/2025	Ahmad, Sidra						X	X	X		X	X	X	X	X				X	X				theobabka@gmail.com	email
8/11/2025	Amy M						X	X	X		X	X	X	X	X				X	X				tearingitdown3@yahoo.com	email
8/11/2025	Angell, JL						X	X	X		X	X	X	X	X				X	X				jangell@earthlink.net	email
8/11/2025	applepies			X				X	X		X	X		X					X	X			X	wishtomakeapplepie@gmail.com	email
8/11/2025	Arno, Iris						X	X	X		X	X	X	X	X				X	X				hisk37@gmail.com	email
8/11/2025	Arsenault, Peter				X			X	X		X			X	X	X								peter@pjaarch.com	email

Date	Name	Representing	AGENCY	1.1 Purpose & Need	2.0 Proposed Action & Alternatives	3.1 Land Use - Zoning	3.2 Geology-Soils-Topography	3.3 Water Resources	3.4 Biological Resources	3.5 Historic & Cultural	3.6 & 3.7 Air Quality-GHG-Climate Change	3.8 Solid waste-Hazardous Materials	3.9 Health & Human Safety	3.10 Utilities	3.11 Transportation	3.12 Noise-Vibration	3.13 Visual Effects - Community Character	3.14 Community Facilities, Open Space, Recreation	3.15 Socioeconomic	3.16 Environmental Justice	4.0 Cumulative Effects	5.0 Public Review - Procedural	6.0 General Comments (support & opposition)	Email	submitted via
8/11/2025	atrigross						X	X	X		X	X	X	X	X				X	X		X		atrigross@gmail.com	email
8/11/2025	baballenger						X	X	X		X	X	X	X	X				X	X		X		baballenger1@gmail.com	email
8/11/2025	Baka, Ryan						X	X	X		X	X	X	X	X				X	X		X		ryan.baka@icloud.com	email
8/11/2025	Bakuzzi, Kevin	NYSDEC Region 7	X				X	X			X													kevin.bakuzzi@dec.ny.gov	email/att
8/11/2025	Bapista, Sandra						X	X	X		X	X	X	X	X				X	X		X		svbapista@gmail.com	email
8/11/2025	Barabi, Soraya						X	X	X		X	X	X	X	X				X	X		X		musiclover2478@yahoo.com	email
8/11/2025	Barges, Meredith								X				X	X		X								mbarges@esf.edu	email
8/11/2025	Barnum, Nancy						X	X	X		X	X	X	X	X				X	X		X		rbarnum2@yahoo.com	email
8/11/2025	Batson, Katelyn						X	X	X		X	X	X	X	X				X	X		X		kbatson508@gmail.com	
8/11/2025	Baum, Carol						X	X			X	X	X						X	X		X		carolbaum@riseup.net	email
8/11/2025	Bauststa						X	X	X		X	X	X	X	X				X	X				mpbaustista@nyc.rr.com	email
8/11/2025	Belletier, Anthony						X	X	X		X	X	X	X	X				X	X		X		belletierlaw@gmail.com	email
8/11/2025	Beltran, Michelle	Director of Continuing Education, Center for Occupational and Environmental Health, Berkeley Public Health						X	X		X	X	X											michellerenee513@gmail.com	email
8/11/2025	Betsy						X	X	X		X	X	X	X	X				X	X		X		betsy@betsyroot.com	email
8/11/2025	Billue, Twigg	Jobs to Move America					X	X	X		X	X	X	X	X				X	X		X		kahmad@jobstomoveamerica.org	email/att/mail
8/11/2025	Block, Leanne						X	X	X		X	X	X	X	X				X	X		X		leanne.block@gmail.com	email
8/11/2025	bluetoothfairy18						X	X	X		X	X	X	X	X				X	X		X		bluetoothfairy18@gmail.com	email
8/11/2025	Boot, Patrick						X	X	X		X	X	X	X	X				X	X		X		psi-wines@wanadoo.fr	email
8/11/2025	Brenner, Lise						X	X	X		X	X	X	X	X				X	X		X		lisebrenner@gmail.com	email
8/11/2025	Bridges, Elizabeth	Jobs to Move America					X	X	X		X	X	X	X	X				X	X		X		kahmad@jobstomoveamerica.org	email/att/mail
8/11/2025	brightroad						X						X						X					lelaw1963@gmail.com	email
8/11/2025	Brown-Newball, Thylis						X	X	X		X	X	X	X	X				X	X		X		tnadji@gmail.com	email
8/11/2025	Burch, Kathy						X	X	X		X	X	X	X	X				X	X		X		kathy.burch58@gmail.com	email
8/11/2025	Burgess, Devin						X	X	X		X	X	X	X	X				X	X		X		dimburgess@gmail.com	email
8/11/2025	Byrne, Nick						X	X	X		X	X	X	X	X				X	X		X		victoriatheaterarts@gmail.com	email
8/11/2025	Cahl-Hoy, Lynn							X				X										X		lcahlhoy@twcny.rr.com	email
8/11/2025	Caiazza, Roger	Pragmatic Environmentalist of New York									X			X										nypragmaticenvironmentalist@gmail.com	email/attach
8/11/2025	Cain, Jenna						X	X	X		X	X	X	X	X				X	X		X		jenna.cain56@gmail.com	email
8/11/2025	Cameron, Alexis						X	X	X		X	X	X	X	X				X	X		X		alexis.cameron@gmail.com	email
8/11/2025	Carnamela, Laura						X	X	X		X	X	X	X	X				X	X		X		lcanname@hotmail.com	email
8/11/2025	Catherine						X	X	X		X	X	X	X	X				X	X		X		cdmeforplanet1@gmail.com	email
8/11/2025	cbrexel						X	X	X		X	X	X	X	X				X	X		X		cbrexel@aol.com	email
8/11/2025	ceskym						X	X	X		X	X	X	X	X				X	X		X		ceskym@gmail.com	email
8/11/2025	cwest67						X	X	X		X	X	X	X	X				X	X		X		cwest67@gmail.com	email
8/11/2025	Cho, AJ						X	X	X		X	X	X	X	X				X	X		X		amenoartemis@gmail.com	email
8/11/2025	Cho, AJ						X	X	X		X	X	X	X	X				X	X		X		amenoartemis@gmail.com	email
8/11/2025	Chock, Carol						X	X	X		X	X	X	X	X				X	X		X		carolchock@gmail.com	email
8/11/2025	Ciavarrì, Paul						X	X	X		X	X	X	X	X				X	X		X		pciavarrì@iscny.org	email
8/11/2025	Ciurczak, Diane						X	X	X		X	X	X	X	X				X	X		X		dianeciurczak@gmail.com	email
8/11/2025	claw4						X	X	X		X	X	X	X	X				X	X		X		claw4@comcast.net	email
8/11/2025	CNY Chapter NYS Alliance for Retired Americans																								mail/hand deliv
8/11/2025	CNY Solidarity Coalition							X	X			X		X										cnysolidarity@gmail.com	email
8/11/2025	Cohn, Katherin	CHIPS Communities United			X			X			X	X	X						X					katherine@chipscommunitiesunited.org	email/att
8/11/2025	Conklin, F.						X	X	X		X	X	X	X	X				X	X		X		f.conklin7@gmail.com	email
8/11/2025	Coppola, Hilary-Anne						X	X	X		X	X	X	X	X							X		hilcoppola@gmail.com	email
8/11/2025	Couchon, Doug						X	X	X		X	X	X	X	X				X	X		X		doucouchon@yahoo.com	email
8/11/2025	Cridland, Lee						X	X	X		X	X	X	X	X				X	X		X		lee.cridland@gmail.com	email
8/11/2025	Cronin, Cathy						X	X	X		X	X	X	X	X				X	X		X		cathymecronin@gmail.com	email
8/11/2025	Crovella, Paul										X													plcrovella@esf.edu	email/att
8/11/2025	Damalt, Bruce						X	X	X		X	X	X	X	X				X	X		X		gunpowder555@yahoo.com	email
8/11/2025	Deshotels, James						X	X	X		X	X	X	X	X				X	X		X		jdesh@loyno.edu	email
8/11/2025	dianed						X	X	X		X	X	X	X	X				X	X		X		dianed@nirs.org	email
8/11/2025	DiFlorio, Nancy						X	X	X		X	X	X	X	X				X	X		X		diflorio.nancy2@gmail.com	email
8/11/2025	dmatza9						X	X	X		X	X	X	X	X				X	X		X		dmatza9@gmail.com	email
8/11/2025	Doody, Paul					X	X	X	X	X	X	X	X	X	X		X		X	X		X	X	pauldoody1978@gmail.com	email/att
8/11/2025	Douglas, Covington						X	X	X		X	X	X	X	X				X	X		X		covingtondouglas@gmail.com	email
8/11/2025	Drew, Ian	USFWS	X																						
8/11/2025	Druke, Lisa							X	X		X	X		X										lsadruke@gmail.com	email
8/11/2025	Durbin-Westby, Paula				X			X			X	X							X					durbinwestbyindexing@gmail.com	email
8/11/2025	dvdtr6314						X	X	X		X	X	X	X	X				X	X		X		dvdtr6314@gmail.com	email
8/11/2025	eam1220						X	X	X		X	X	X	X	X				X	X		X		eam1220@gmail.com	email
8/11/2025	ebanks						X	X	X		X	X	X	X	X				X	X		X		ebanks@daemen.edu	email
8/11/2025	Egan, Chris										X			X					X					chrisegan01@gmail.com	email
8/11/2025	elizbeutler						X	X	X		X	X	X	X	X				X	X		X		elizbeutler@gmail.com	email
8/11/2025	Elliott, Diana	Citizen				X		X	X		X			X	X				X	X				diana.elliott505@gmail.com	email
8/11/2025	Ellis, Tom						X	X	X		X	X	X	X	X								X	tomellis107@gmail.com	email
8/11/2025	Elison, Martha						X	X	X		X	X	X	X	X				X	X		X		arthaellison1@gmail.com	email
8/11/2025	emswaine9						X	X	X		X	X	X	X	X				X	X		X		emswaine9@gmail.com	email

Date	Name	Representing	AGENCY	1.1 Purpose & Need	2.0 Proposed Action & Alternatives	3.1 Land Use - Zoning	3.2 Geology-Soils-Topography	3.3 Water Resources	3.4 Biological Resources	3.5 Historic & Cultural	3.6 & 3.7 Air Quality-GHG-Climate Change	3.8 Solid waste-Hazardous Materials	3.9 Health & Human Safety	3.10 Utilities	3.11 Transportation	3.12 Noise-Vibration	3.13 Visual Effects - Community Character	3.14 Community Facilities, Open Space, Recreation	3.15 Socioeconomic	3.16 Environmental Justice	4.0 Cumulative Effects	5.0 Public Review - Procedural	6.0 General Comments (support & opposition)	Email	submitted via	
8/11/2025	Escobar, Heidi						X	X	X			X	X	X					X					heidescobar1@gmail.com	email	
8/11/2025	Escobar, Heidi							X	X		X	X	X						X				X		heidescobar1@gmail.com	email
8/11/2025	Esposito, Louis						X	X	X		X	X	X	X	X				X	X			X		lasurf4life@gmail.com	email
8/11/2025	even8r						X	X	X		X	X	X	X	X				X	X			X		even8r@yahoo.com	email
8/11/2025	Fadden, Christina					X		X	X																christinafitch1@gmail.com	email
8/11/2025	Federman, Barbara						X	X	X		X	X	X	X									X		bflrny@aol.com	email
8/11/2025	Feliciano, Lorrie						X	X	X		X	X	X	X	X				X						lafcactusife@gmail.com	email
8/11/2025	Feliciano, Lorrie Ann							X	X		X	X		X											lafcactusife@gmail.com	email
8/11/2025	Ferrante, Caitlin	Sierra Club, Atlantic Chapter			X			X	X		X	X	x	X	X			X			X		X		caitlin.ferrante@sierrackub.org	email
8/11/2025	Figuera, Linda						X	X	X		X	X	X	X	X				X	X			X		teddyLucyinda@yahoo.com	email
8/11/2025	Finneran, Mary						X	X	X		X	X	X	X	X				X	X			X		msf123@yahoo.com	email
8/11/2025	Fiorello, Kate	Town of Cicero Town Engineer	X					X										X							kfiorello@cicerony.gov	email
8/11/2025	Fisk, Kaya						X	X	X		X	X	X	X	X				X	X			X		k.fisk715@gmail.com	email
8/11/2025	Fogden, Julie						X	X	X		X	X	X	X	X				X	X			X		jgfogden@gmail.com	email
8/11/2025	Fonger, Nicole						X	X	X		X	X	X	X	X				X	X					rfonger@syr.edu	email
8/11/2025	Frances m						X	X	X		X	X	X	X	X				X	X			X		conquerthegreatdivide3@aol.com	email
8/11/2025	Friedman, David							X			X	X													duvbab@aol.com	email
8/11/2025	Frisch, Tracy	Clean Air Action Network of Glens Falls						X			X	X		X											tracy.frisch@gmail.com	email
8/11/2025	García, Julio	Jobs to Move America					X	X	X		X	X	X	X	X				X	X			X		kahmad@jobstomoveamerica.org	email/att/mail
8/11/2025	Gataletto, Donna							X			X	X		X					X						deegmail@yahoo.com	email
8/11/2025	gb191919gb						X	X	X		X	X	X	X	X				X	X			X		gb191919gb@gmail.com	email
8/11/2025	Gibb, Ken						X	X	X		X	X	X	X	X				X	X			X		kengibb@gmail.com	email
8/11/2025	Gigler-Caro, Jacob						X	X	X		X	X	X	X	X				X	X			X		info@saltcityharvest.farm	email
8/11/2025	gilmores						X	X	X		X	X	X	X	X				X	X			X		gilmores@ccsu.edu	email
8/11/2025	Gionet, Melanie					X		X	X		X	X	X	X				X					X		mrsionet@gmail.com	email
8/11/2025	Giorgio, Nicola						X	X	X		X	X	X	X	X				X	X			X		ncl.grg@gmail.com	email
8/11/2025	Glazier, Christa	CenterState CEO (see also complete list of signatories)						X											X				X		cglazier@centerstateceo.com	email/att
8/11/2025	Goin, Cody						X	X	X		X	X	X	X	X				X	X			X		codygoin2021@gmail.com	email
8/11/2025	Gonzalez, Brittany	Jobs to Move America					X	X	X		X	X	X	X	X				X	X			X		kahmad@jobstomoveamerica.org	email/att/mail
8/11/2025	Gorak, Martha						X	X	X		X	X	X	X	X				X	X			X		martha2503@gmail.com	email
8/11/2025	Gordon, Barry						X	X	X		X	X	X	X	X				X	X			X		barry@barrygordon.com	email
8/11/2025	Gornley, Ethan	Citizen Action of New York					X	X			X	X	X						X				X		egornley@citizenactionny.com	email/att
8/11/2025	Graham, Sean						X	X	X		X	X	X	X	X				X	X			X		seancgraham@gmail.com	email
8/11/2025	Graner, Ron						X	X	X		X	X	X	X	X				X	X			X		ronfgraner@gmail.com	email
8/11/2025	Gruber, Samuel							X				X		X	X				X						samuelgruber@gmail.com	email
8/11/2025	Haitaian, Kristen Ryan, Jill	Freshwater Future, Executive Director						X			X			X											kristen@freshwaterfuture.org	email/att
8/11/2025	Hale, Melleny							X																	MelAnieHale@gmail.com	email
8/11/2025	Hale, Melleny							X				X		X											MelAnieHale@gmail.com	email
8/11/2025	Hall, Cory						X	X	X		X	X	X	X	X				X	X			X		oryrose84@aol.com	email
8/11/2025	Hamlin John					X		X	X		X	X	X	X	X				X	X			X		JHHAMLIN@AOL.COM	email
8/11/2025	Hamlin, Mary						X	X	X		X	X	X	X	X				X	X			X		mjoHamlin@aol.com	email
8/11/2025	Hammond, Sue						X	X	X		X	X	X	X	X				X	X			X		s1ph0h2@protonmail.com	email
8/11/2025	Hayes, Regan						X	X	X		X	X	X	X	X				X	X			X		reganhayes2018@gmail.com	email
8/11/2025	Haynie, Ph.D., Michael	Syracuse University																					X			email/attach mail
8/11/2025	Heinlein, Phil						X	X	X		X	X	X	X	X				X	X			X		pdeheinlein@gmail.com	email
8/11/2025	Hellquist, Eric							X	X			X	X	X					X				X		ehellquist@hotmail.com	email
8/11/2025	Hepburn, Adam	Syracuse University																					X		ahhepburn@syr.edu	email
8/11/2025	Hoffmann, Melissa						X	X	X		X	X	X	X	X				X	X			X		melssahoffmann5@gmail.com	email
8/11/2025	Hok, Jennifer						X	X			X	X	X	X	X				X	X			X		jennyhok@hotmail.com	email
8/11/2025	Hollinrake, Mark						X	X	X		X	X	X	X	X				X	X			X		markhollinrake1993@gmail.com	email
8/11/2025	Hollo, Tamsin						X	X	X		X	X	X	X	X				X	X			X		tamsin.hollo@gmail.com	email
8/11/2025	Horwitz, Martin						X	X	X		X	X	X	X	X				X	X			X		martin7ahorwitz@yahoo.com	email
8/11/2025	Imlay, Marc						X	X	X		X	X	X	X	X				X	X			X		marc.imlay@mdsierra.org	email
8/11/2025	Irish, Grace						X	X	X		X	X	X	X	X				X	X			X		graceocat12@gmail.com	email
8/11/2025	Jacobi, Etana	IUE-CWA					X	X	X		X	X	X	X	X				X	X			X		ejacobi@cwa-union.org	email/attach
8/11/2025	Jeanne						X	X	X		X	X	X	X	X				X	X			X		jeanne184490@gmail.com	email
8/11/2025	jemarolo10						X	X	X		X	X	X	X	X				X	X			X		jemaralo10@gmail.com	email
8/11/2025	Jennifer, Cooper						X	X	X		X	X	X	X	X				X	X			X		cooperjennifer093@gmail.com	email
8/11/2025	Jimenez, Caroline						X	X	X		X	X	X	X	X				X	X			X		projectcaroline.jimenez@gmail.com	email
8/11/2025	jimkeenan48						X	X	X		X	X	X	X	X				X	X			X		jimkeenan48@icloud.com	email
8/11/2025	K., Saran						X	X	X		X	X	X	X	X				X	X			X		cdmeforplanet1@gmail.com	email
8/11/2025	KSLund						X	X	X		X	X	X	X	X				X	X			X		KSLund@gmail.com	email
8/11/2025	Kalmuss-Katz, Jon	EarthJustice and others						X	X		X	X	X	X											jkalmusskatz@earthjustice.org	email/att
8/11/2025	Kellogg, Kitty						X	X	X		X	X	X	X	X				X	X			X		keldel1@aol.com	email
8/11/2025	Kellogg, Syd						X	X	X		X	X	X	X	X				X	X			X		sydthekid521@gmail.com	email
8/11/2025	Kent-Burman, Meredith						X	X	X		X	X	X	X	X				X	X			X		mkent@health.nyc.gov	email
8/11/2025	Kerney, Owen	City of Syracuse Deputy Commissioner, City Planning & Sustainability	X					X						X	X								X		okerney@syr.gov	email/att
8/11/2025	King, Peter	Moving People Transport Coalition						X			X			X											pking271@pm.me	email/att

Date	Name	Representing	AGENCY	1.1 Purpose & Need	2.0 Proposed Action & Alternatives	3.1 Land Use - Zoning	3.2 Geology-Soils-Topography	3.3 Water Resources	3.4 Biological Resources	3.5 Historic & Cultural	3.6 & 3.7 Air Quality-GHG-Climate Change	3.8 Solid waste-Hazardous Materials	3.9 Health & Human Safety	3.10 Utilities	3.11 Transportation	3.12 Noise-Vibration	3.13 Visual Effects - Community Character	3.14 Community Facilities, Open Space, Recreation	3.15 Socioeconomic	3.16 Environmental Justice	4.0 Cumulative Effects	5.0 Public Review - Procedural	6.0 General Comments (support & opposition)	Email	submitted via		
8/11/2025	King, Peter	Moving People Transport Coalition					X																	pking271@pm.me	email/att		
8/11/2025	Kliche, Diana						X	X	X		X	X	X	X	X				X	X		X			klichediana@gmail.com	email	
8/11/2025	Kline, Jennifer						X	X	X		X	X	X	X	X				X	X		X			jenniferckline@gmail.com	email	
8/11/2025	kminault						X	X	X		X	X	X	X	X				X	X		X			kminault@gmail.com	email	
8/11/2025	Korwinski, Laurie						X	X	X		X	X	X	X	X				X	X		X			laurie.korwinski@dor.org	email	
8/11/2025	Korbas, Traci						X	X	X		X	X	X	X	X				X	X		X			rocnrollgr@yahoo.com	email	
8/11/2025	Kornbluth, Dick	Urban Jobs Task Force			X			X	X			X													dick@dickkornbluth.com	email	
8/11/2025	Kublick, Jan							X			X	X	X	X								X			jan.kublick@gmail.com	email/att	
8/11/2025	Kulczyk						X	X	X		X	X	X	X	X				X	X		X			jkulczyk@fwatch.org	email	
8/11/2025	Kwiek, Michael							X	X		X	X	X	X				X	X		X				mikekwiek@gmail.com	email	
8/11/2025	Lamit, Jamie							X										X		X		X			jlamit@syr.edu	email	
8/11/2025	Lamit, Jamie							X						X											morchella8@gmail.com	email	
8/11/2025	Lamit, Jamie							X						X											morchella8@gmail.com	email	
8/11/2025	Landes, Ann & Scott				X	X		X	X		X			X	X						X				-criccracker@bellsouth.net-	email/att	
8/11/2025	Landis, Catherine							X	X		X											X			landis@syr.edu	email/attach	
8/11/2025	laurel2000						X	X	X		X	X	X	X	X				X	X		X			laurel2000@gmail.com	email	
8/11/2025	Law, Tom																								handwritten, in person review	letter	
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Date	Name	Representing	AGENCY	1.1 Purpose & Need	2.0 Proposed Action & Alternatives	3.1 Land Use - Zoning	3.2 Geology-Soils-Topography	3.3 Water Resources	3.4 Biological Resources	3.5 Historic & Cultural	3.6 & 3.7 Air Quality-GHG-Climate Change	3.8 Solid waste-Hazardous Materials	3.9 Health & Human Safety	3.10 Utilities	3.11 Transportation	3.12 Noise-Vibration	3.13 Visual Effects - Community Character	3.14 Community Facilities, Open Space, Recreation	3.15 Socioeconomic	3.16 Environmental Justice	4.0 Cumulative Effects	5.0 Public Review - Procedural	6.0 General Comments (support & opposition)	Email	submitted via		
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SustainCNY Petition to Extend the Comment Period

392 signatories listed below provided additional comment with their request for an extension.

1,250 additional signatories did not provide any further comment, and are not listed individually on this table, but are noted as signatory 393-1642 at the end of the table.

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From: Lauren LaBorde <noreply@adv.actionnetwork.org>
Sent: Friday, July 18, 2025 11:49 AM
To: chipsnepa
Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

CHIPS Program Office CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
- **Greenhouse Gases:** The DEIS does not state how Micron will meet its own 100% renewable

energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar –and without relying on renewable energy credits or using renewable energy that is already on the grid – to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,
Lauren

Lauren LaBorde
lauren.laborde@gmail.com
4873 North Hermitage Avenue, Apt 1S
Chicago, Illinois 60640

Archived: Wednesday, July 30, 2025 9:14:28 AM

From: [David Cotner](#)

Mail received time: Tue, 22 Jul 2025 18:59:06

Sent: Tuesday, July 22, 2025 2:59:07 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

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- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
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Thank you for your consideration of my comments.

Sincerely,

David Cotner
hertzion@gmail.com
675 E Santa Clara St
Ventura, California 93001

Archived: Wednesday, July 30, 2025 9:19:17 AM

From: [Dominique Edmondson](#)

Mail received time: Tue, 22 Jul 2025 19:00:05

Sent: Tuesday, July 22, 2025 3:00:05 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Dominique Edmondson
dedmondson@cwa-union.org
10706 Wyld Drive
Upper Marlboro, Maryland 20772

Archived: Wednesday, July 30, 2025 9:19:22 AM

From: [karen winnubst](#)

Mail received time: Tue, 22 Jul 2025 19:00:11

Sent: Tuesday, July 22, 2025 3:00:12 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

karen winnubst
taos84@earthlink.net
415 HOUSTON ST
CEDAR HILL, Texas 75104

Archived: Wednesday, July 30, 2025 9:19:28 AM

From: [Joseph Pfister](#)

Mail received time: Tue, 22 Jul 2025 19:01:15

Sent: Tuesday, July 22, 2025 3:01:17 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Joseph Pfister
a1w2q6yef@mozmail.com
651 Vanderbilt Street
Brooklyn, New York 11218

Archived: Wednesday, July 30, 2025 9:19:33 AM

From: epash@diamondpharmacy.com

Mail received time: Tue, 22 Jul 2025 19:01:18

Sent: Tuesday, July 22, 2025 3:01:19 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

epash@diamondpharmacy.com
373 Degaetano Road Indiana, PA 15701
Indiana, Pennsylvania 15701

Archived: Wednesday, July 30, 2025 9:19:38 AM

From: [Robert Lombardi](#)

Mail received time: Tue, 22 Jul 2025 19:01:41

Sent: Tuesday, July 22, 2025 3:01:41 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Robert Lombardi
bob532@aol.com
1465 E 64th St
Brooklyn, New York 11234

Archived: Wednesday, July 30, 2025 9:19:43 AM

From: [Jodie Leidecker](#)

Mail received time: Tue, 22 Jul 2025 19:02:26

Sent: Tuesday, July 22, 2025 3:02:26 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Jodie Leidecker
jodieleidecker@gmail.com
334 Lott Avenue
Brooklyn, New York 11212-7006

Archived: Wednesday, July 30, 2025 9:19:48 AM

From: [Jaszmene Smith](#)

Mail received time: Tue, 22 Jul 2025 19:02:41

Sent: Tuesday, July 22, 2025 3:02:42 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Jaszmene Smith
smith.jaszmene9@gmail.com
1017 School Vlg
Bridgeton , New Jersey 08302

Archived: Wednesday, July 30, 2025 9:19:59 AM

From: tia@anlf.com

Mail received time: Tue, 22 Jul 2025 19:03:17

Sent: Tuesday, July 22, 2025 3:03:18 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

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Thank you for your consideration of my comments.

Sincerely,

tia@anlf.com

3959 Berryman Avenue

Los Angeles, California 90066

Archived: Wednesday, July 30, 2025 9:20:04 AM

From: [Jared Cornelia](#)

Mail received time: Tue, 22 Jul 2025 19:03:50

Sent: Tuesday, July 22, 2025 3:03:51 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Jared Cornelia
jaredc1200@gmail.com
2165 Bedell Road
Grand Island, New York 14072

Archived: Wednesday, July 30, 2025 9:20:10 AM

From: [Vicki Fox](#)

Mail received time: Tue, 22 Jul 2025 19:05:54

Sent: Tuesday, July 22, 2025 3:05:55 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

Vicki Fox
vicki831@earthlink.net
67 Wodenethe Dr
Beacon, New York 12508

Archived: Wednesday, July 30, 2025 9:20:15 AM

From: [Felicia Killiebrew](#)

Mail received time: Tue, 22 Jul 2025 19:05:55

Sent: Tuesday, July 22, 2025 3:05:56 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

Felicia Killiebrew
fkilliebrew76@gmail.com
5340 ville Cecelia lane
Hazelwood, Missouri 63042

Archived: Wednesday, July 30, 2025 9:20:20 AM

From: [Ken Gibb](#)

Mail received time: Tue, 22 Jul 2025 19:07:49

Sent: Tuesday, July 22, 2025 3:07:50 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Sincerely,

Ken Gibb

kengibb@gmail.com

PO Box 11616

Zephyr Cove, Nevada 89448

Archived: Wednesday, July 30, 2025 9:20:25 AM

From: [Martin Horwitz](#)

Mail received time: Tue, 22 Jul 2025 19:08:09

Sent: Tuesday, July 22, 2025 3:08:10 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

Martin Horwitz
martin7ahorwitz@yahoo.com
1326 23rd Ave
San Francisco, California 94122

Archived: Wednesday, July 30, 2025 9:20:30 AM

From: ethanbfox@gmail.com

Mail received time: Tue, 22 Jul 2025 19:08:19

Sent: Tuesday, July 22, 2025 3:08:20 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

ethanbfox@gmail.com
4513 State Highway 28 South
Oneonta, New York 13820

Archived: Wednesday, July 30, 2025 9:17:24 AM

From: [Lisa Hammermeister](#)

Mail received time: Tue, 22 Jul 2025 19:08:55

Sent: Tuesday, July 22, 2025 3:08:55 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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DON'T SACRIFICE OUR ENVIRONMENT FOR BIG BUSINESS GREED.

Thank you for your consideration of my comments.

Sincerely,

Lisa Hammermeister
necrohead56@gmail.com
16456 Shamhart Drive
Granada Hills, California 91344

Archived: Wednesday, July 30, 2025 9:17:31 AM

From: [Cheryl Speer](#)

Mail received time: Tue, 22 Jul 2025 19:09:40

Sent: Tuesday, July 22, 2025 3:09:42 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Cheryl Speer
cherylaspeer@gmail.com
410 SW Park St
Camas, Washington 98607

Archived: Wednesday, July 30, 2025 9:17:37 AM

From: [Linda Fighera](#)

Mail received time: Tue, 22 Jul 2025 19:10:47

Sent: Tuesday, July 22, 2025 3:10:49 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

Linda Fighera

teddylucylinda@yahoo.com

1 WELLS MANOR LANE APT.11

Rhinebeck, New York 12572-1934

Archived: Wednesday, July 30, 2025 9:17:43 AM

From: [Martha Ellison](#)

Mail received time: Tue, 22 Jul 2025 19:11:14

Sent: Tuesday, July 22, 2025 3:11:15 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Martha Ellison
marthaellison1@gmail.com
130 N. Ryans Way
Saint Joseph, Missouri 64506

Archived: Wednesday, July 30, 2025 9:17:49 AM

From: strych916@icloud.com

Mail received time: Tue, 22 Jul 2025 19:11:24

Sent: Tuesday, July 22, 2025 3:11:25 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Sincerely,

strych916@icloud.com
17540 St. Francis Blvd
Ramsey, Minnesota 55303

Archived: Wednesday, July 30, 2025 9:17:54 AM

From: mkent@health.nyc.gov

Mail received time: Tue, 22 Jul 2025 19:12:11

Sent: Tuesday, July 22, 2025 3:12:12 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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CHIPS Program Office,

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Sincerely,

mkent@health.nyc.gov
235 East 22nd Street, Apt# 12E
New York City, USA, New York 10010

Archived: Wednesday, July 30, 2025 9:17:59 AM

From: [Cynthia Fredrick](#)

Mail received time: Tue, 22 Jul 2025 19:12:30

Sent: Tuesday, July 22, 2025 3:12:31 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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CHIPS Program Office,

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Sincerely,

Cynthia Fredrick
fredrick.cynthia@gmail.com
12 Circle Lane
Albany, New York 12203

Archived: Wednesday, July 30, 2025 9:18:04 AM

From: [Diana Emerich](#)

Mail received time: Tue, 22 Jul 2025 19:13:15

Sent: Tuesday, July 22, 2025 3:13:17 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Sincerely,

Diana Emerich
dianaemerich@gmail.com
284 Eastern Parkway
Brooklyn, New York 11225

Archived: Wednesday, July 30, 2025 9:18:09 AM

From: [Naomi W](#)

Mail received time: Tue, 22 Jul 2025 19:17:07

Sent: Tuesday, July 22, 2025 3:17:08 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Sincerely,

Naomi W
naomi4everafter@hotmail.com
2596 N Hearthglow Ave
Eagle, Idaho 83616

Archived: Wednesday, July 30, 2025 9:18:15 AM

From: [Joseph Naidnur](#)

Mail received time: Tue, 22 Jul 2025 19:27:31

Sent: Tuesday, July 22, 2025 3:27:35 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Sincerely,
Joseph Naidnur

Joseph Naidnur
jnaidnur@gmail.com
3031 W Larchmont Ln
Peoria, Illinois 61615

Archived: Wednesday, July 30, 2025 9:18:20 AM

From: markhollinrake1993@gmail.com

Mail received time: Tue, 22 Jul 2025 19:27:44

Sent: Tuesday, July 22, 2025 3:27:45 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
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Sincerely,

markhollinrake1993@gmail.com
35 Morningside Av
New York , New York 10026

Archived: Wednesday, July 30, 2025 9:18:25 AM

From: [CATHY CRONIN](#)

Mail received time: Tue, 22 Jul 2025 19:27:49

Sent: Tuesday, July 22, 2025 3:27:51 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

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Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

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Thank you for your consideration of my comments.

Sincerely,

CATHY CRONIN

cathymecronin@gmail.com

169 Centre St N

Schenectady, New York 12345

Archived: Wednesday, July 30, 2025 9:18:31 AM

From: [Cody Goin](#)

Mail received time: Tue, 22 Jul 2025 19:30:07

Sent: Tuesday, July 22, 2025 3:30:08 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

Cody Goin
codygoin2021@gmail.com
3073 State Highway 73
Buffalo, Missouri 65622

Archived: Wednesday, July 30, 2025 9:18:36 AM

From: [Jill Diane](#)

Mail received time: Tue, 22 Jul 2025 19:32:46

Sent: Tuesday, July 22, 2025 3:32:47 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

Jill Diane
juliad370@proton.me
3230 INDIANOLA AVE
COLUMBUS, Ohio 43202

Archived: Wednesday, July 30, 2025 9:18:41 AM

From: [JL Angell](#)

Mail received time: Tue, 22 Jul 2025 19:34:28

Sent: Tuesday, July 22, 2025 3:34:28 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

JL Angell

jangell@earthlink.net

2391 Ponderosa Rd

Rescue, California 95672

Archived: Wednesday, July 30, 2025 9:18:46 AM

From: [Lana May](#)

Mail received time: Tue, 22 Jul 2025 19:35:23

Sent: Tuesday, July 22, 2025 3:35:24 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Sincerely,

Lana May
lanamay300@gmail.com
300 S. Edward St.
Mount Prospect, Illinois 60056

Archived: Wednesday, July 30, 2025 9:18:51 AM

From: [Ken Broome](#)

Mail received time: Tue, 22 Jul 2025 19:35:29

Sent: Tuesday, July 22, 2025 3:35:30 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Sincerely,

Ken Broome
ellesseye@gmail.com
1209 Filmore St Apt C
Raleigh, North Carolina 27605-1278

Archived: Wednesday, July 30, 2025 9:18:56 AM

From: [Martha Gorak](#)

Mail received time: Tue, 22 Jul 2025 19:35:31

Sent: Tuesday, July 22, 2025 3:35:32 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Sincerely,

Martha Gorak
martha2503@gmail.com
837 Jaquet Dr
Bellaire, Texas 77401

Archived: Wednesday, July 30, 2025 9:19:02 AM

From: [Diana Kliche](#)

Mail received time: Tue, 22 Jul 2025 19:38:43

Sent: Tuesday, July 22, 2025 3:38:44 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Sincerely,

Diana Kliche
klichediana@gmail.com
3351 Rldge Park Court
Long Beach, California 90804

Archived: Wednesday, July 30, 2025 9:19:07 AM

From: [Ceri McClellan](#)

Mail received time: Tue, 22 Jul 2025 19:44:13

Sent: Tuesday, July 22, 2025 3:44:14 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Sincerely,

Ceri McClellan
enfys72@gmail.com
107 Smugglers, Bridgemarsh Lane,
Althorne , England CM3 6DQ

Archived: Wednesday, July 30, 2025 9:19:12 AM

From: [Susan Gilmore](#)

Mail received time: Tue, 22 Jul 2025 19:47:37

Sent: Tuesday, July 22, 2025 3:47:38 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

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- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
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Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,

Susan Gilmore
susannadinegilmore@yahoo.com
19 Auburn Rd
West Hartford, Connecticut 06119

Archived: Wednesday, July 30, 2025 9:24:43 AM

From: [Alyson Shotz](#)

Mail received time: Tue, 22 Jul 2025 19:48:23

Sent: Tuesday, July 22, 2025 3:48:25 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

Alyson Shotz
signatures.carmaker214@passinbox.com
63 flushing ave
Brooklyn, New York 11205

Archived: Wednesday, July 30, 2025 9:24:51 AM

From: [Briar Winters](#)

Mail received time: Tue, 22 Jul 2025 19:49:50

Sent: Tuesday, July 22, 2025 3:49:51 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

Briar Winters

briar.winters@gmail.com

157 Rivington St, Apt 11

New York, New York 10002

Archived: Wednesday, July 30, 2025 9:24:57 AM

From: [Abigail Gindele](#)

Mail received time: Tue, 22 Jul 2025 19:51:36

Sent: Tuesday, July 22, 2025 3:51:37 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Abigail Gindele
agindele@gmail.com
229 Clinton St
Portsmouth, New Hampshire 03801

Archived: Wednesday, July 30, 2025 9:24:21 AM

From: [Elizabeth Seltzer](#)

Mail received time: Tue, 22 Jul 2025 19:52:43

Sent: Tuesday, July 22, 2025 3:52:44 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Elizabeth Seltzer
ees01@earthlink.net
11 W. Ridge Rd.
Media, Pennsylvania 19063

Archived: Wednesday, July 30, 2025 9:24:27 AM

From: [Perry Gx](#)

Mail received time: Tue, 22 Jul 2025 19:53:57

Sent: Tuesday, July 22, 2025 3:53:59 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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CHIPS Program Office,

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Sincerely, Perry Gx

Perry Gx
perrygxx@gmail.com
14312 Franklin Avenue
Tustin, California 92780

Archived: Wednesday, July 30, 2025 9:24:33 AM

From: [Frances m](#)

Mail received time: Tue, 22 Jul 2025 19:56:27

Sent: Tuesday, July 22, 2025 3:56:29 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Frances m
conquerthisgreatdivide3@aol.com
332 Campbell Dr
Rogersville, Tennessee 37857

Archived: Wednesday, July 30, 2025 9:26:48 AM

From: [Amy M](#)

Mail received time: Tue, 22 Jul 2025 19:56:44

Sent: Tuesday, July 22, 2025 3:56:46 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Sincerely,

Amy M
tearingitdown3@yahoo.com
332 Campbell Dr
Rogersville, Tennessee 37857

Archived: Wednesday, July 30, 2025 9:26:54 AM

From: mendezj@hawaii.edu

Mail received time: Tue, 22 Jul 2025 19:57:19

Sent: Tuesday, July 22, 2025 3:57:20 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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mendezj@hawaii.edu
1326B Alewa Dr.
Honolulu, Hawaii 96816

Archived: Wednesday, July 30, 2025 9:26:59 AM

From: [Fern Schlesinger](#)

Mail received time: Tue, 22 Jul 2025 20:00:35

Sent: Tuesday, July 22, 2025 4:00:37 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

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- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
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Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,

Fern Schlesinger
fern.schlesinger@gmail.com
3951 Gouverneur Ave Apt 6B
Bronx, New York 10463

Archived: Wednesday, July 30, 2025 9:27:04 AM

From: [jared windus](#)

Mail received time: Tue, 22 Jul 2025 20:00:36

Sent: Tuesday, July 22, 2025 4:00:38 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

jared windus
jared.windus@gmail.com
401 boston st
topsfield, Massachusetts 01983

Archived: Wednesday, July 30, 2025 9:27:10 AM

From: threegables1819@gmail.com

Mail received time: Tue, 22 Jul 2025 20:00:37

Sent: Tuesday, July 22, 2025 4:00:39 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

threegables1819@gmail.com
1209 T St #3
Sacramento, California 95811

Archived: Wednesday, July 30, 2025 9:27:15 AM

From: lrpodobinski@gmail.com

Mail received time: Tue, 22 Jul 2025 20:01:53

Sent: Tuesday, July 22, 2025 4:01:54 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

lrpodobinski@gmail.com
570 Warner Ave S
Mahtomedi , Minnesota 55115

Archived: Wednesday, July 30, 2025 9:27:20 AM

From: [Beth Goode](#)

Mail received time: Tue, 22 Jul 2025 20:06:20

Sent: Tuesday, July 22, 2025 4:06:21 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

I am very concerned about the environmental impact of this project on the wetlands which are home to a diverse and rich species population. I also have a lot of dread when it comes to the PFAS that will enter the water and the soil. These chemicals are "forever" and they are NOT healthy for any living thing.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

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Thank you for your consideration of my comments.

Sincerely,

Beth Goode
goodeb22@gmail.com
5633 Spokane St
Los Angeles, California 90016

Archived: Wednesday, July 30, 2025 9:27:26 AM

From: steven.j.vogel@earthlink.net

Mail received time: Tue, 22 Jul 2025 20:07:27

Sent: Tuesday, July 22, 2025 4:07:28 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Sincerely,

steven.j.vogel@earthlink.net
449 Hampton Ct
Falls Church, Virginia 22046-4121

Archived: Wednesday, July 30, 2025 9:25:34 AM

From: [Sharon Longyear](#)

Mail received time: Tue, 22 Jul 2025 20:21:47

Sent: Tuesday, July 22, 2025 4:21:48 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Sincerely,

Sharon Longyear
sharonmlongyear@gmail.com
21 Rondout Harbor
Port Ewen, New York 12466

Archived: Wednesday, July 30, 2025 9:25:40 AM

From: [Ryan Baka](#)

Mail received time: Tue, 22 Jul 2025 20:22:21

Sent: Tuesday, July 22, 2025 4:22:23 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

Ryan Baka

ryan.baka@icloud.com

3107 Knox Ave N.

Minneapolis , Minnesota 55411

Archived: Wednesday, July 30, 2025 9:25:46 AM

From: [Melanie Dieringer](#)

Mail received time: Tue, 22 Jul 2025 20:23:55

Sent: Tuesday, July 22, 2025 4:23:57 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,

Melanie Dieringer
meldier7681@gmail.com
68 Leddy Dr,
EPPING, New Hampshire 03042-3308

Archived: Wednesday, July 30, 2025 9:25:51 AM

From: [Jamie Shields](#)

Mail received time: Tue, 22 Jul 2025 20:24:35

Sent: Tuesday, July 22, 2025 4:24:36 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
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Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

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Thank you for your consideration of my comments.

Sincerely,

Jamie Shields
jfillmore66@gmail.com
523 E. 2nd Street
Rainier, Oregon 97048

Archived: Wednesday, July 30, 2025 9:25:57 AM

From: [Jeff Kulp](#)

Mail received time: Tue, 22 Jul 2025 20:31:34

Sent: Tuesday, July 22, 2025 4:31:35 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Jeff Kulp
jskulp1@gmail.com
5417 Oldtowne Road
Raleigh, North Carolina 27612

Archived: Wednesday, July 30, 2025 9:26:02 AM

From: aruther.ny@gmail.com

Mail received time: Tue, 22 Jul 2025 20:33:46

Sent: Tuesday, July 22, 2025 4:33:48 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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NYPA to have them build enough publicly owned renewable energy to power their operations, and if they used heat pumps and thermal energy networks to heat the building instead of gas. Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

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Thank you for your consideration of my comments.

Sincerely,

aruther.ny@gmail.com
2 Town Garden Drive
Liverpool, New York 13088

Archived: Wednesday, July 30, 2025 9:26:07 AM

From: [steve lucas](#)

Mail received time: Tue, 22 Jul 2025 20:34:11

Sent: Tuesday, July 22, 2025 4:34:13 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

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Thank you for your consideration of my comments.

Sincerely,

steve lucas
slucas78704@gmail.com
2706 del curto rd
austin, Texas 78704

Archived: Wednesday, July 30, 2025 9:26:12 AM

From: jphilipps1259@gmail.com

Mail received time: Tue, 22 Jul 2025 20:35:15

Sent: Tuesday, July 22, 2025 4:35:16 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

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Thank you for your consideration of my comments.

Sincerely,

jphilipps1259@gmail.com
1385 Independence Court
Newark, Ohio 43055

Archived: Wednesday, July 30, 2025 9:26:17 AM

From: [Charlotta Ball](#)

Mail received time: Tue, 22 Jul 2025 20:36:27

Sent: Tuesday, July 22, 2025 4:36:29 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Charlotta Ball
mariahball@yahoo.com
237 SE 18th Ave Apt 202
Hillsboro, Oregon 97123

Archived: Wednesday, July 30, 2025 9:26:23 AM

From: ejacobi@cwa-union.org

Mail received time: Tue, 22 Jul 2025 20:40:47

Sent: Tuesday, July 22, 2025 4:40:48 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

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Thank you for your consideration of my comments.

Sincerely,

ejacobi@cwa-union.org
1205 Miller Ave
Columbus, Ohio 43206

Archived: Wednesday, July 30, 2025 9:26:28 AM

From: [Allister Layne](#)

Mail received time: Tue, 22 Jul 2025 20:48:37

Sent: Tuesday, July 22, 2025 4:48:38 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Allister Layne

layneallister@yahoo.com

1369 Revel Cove Drive SW

Conyers , Georgia 30094

Archived: Wednesday, July 30, 2025 9:26:33 AM

From: [Brian Still](#)

Mail received time: Tue, 22 Jul 2025 20:53:33

Sent: Tuesday, July 22, 2025 4:53:34 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
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Thank you for your consideration of my comments.

Sincerely,

Brian Still
brianmstill@gmail.com
4077 3rd Ave
San Diego , California 92103

Archived: Wednesday, July 30, 2025 9:26:38 AM

From: [Thyais Brown-Newball](#)

Mail received time: Tue, 22 Jul 2025 20:59:56

Sent: Tuesday, July 22, 2025 4:59:56 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPs Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Thyais Brown-Newball
tnadji@gmail.com
480 Lefferts Ave.
Brooklyn, New York 11225

Archived: Wednesday, July 30, 2025 9:26:43 AM

From: [Shawn Johnson](#)

Mail received time: Tue, 22 Jul 2025 21:00:26

Sent: Tuesday, July 22, 2025 5:00:27 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

Shawn Johnson
shawninbarca@gmail.com
951 Stratford Dr
Encinitas, California 92024

Archived: Wednesday, July 30, 2025 8:51:15 AM

From: [Taylor Smith](#)

Mail received time: Tue, 22 Jul 2025 21:09:59

Sent: Tuesday, July 22, 2025 5:10:00 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

Taylor Smith
taylorsmith1051@gmail.com
6424 Green Ridge Ave
New Carlisle , Ohio 45344

Archived: Wednesday, July 30, 2025 8:51:21 AM

From: [Diana Saxon](#)

Mail received time: Tue, 22 Jul 2025 21:32:41

Sent: Tuesday, July 22, 2025 5:32:42 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Sincerely,

Diana Saxon
moondaughter72@hotmail.com
4098 Market St NE, Apt 23
Salem, Oregon 97301

Archived: Wednesday, July 30, 2025 8:50:53 AM

From: [Kanwaldeep Sekhon](#)

Mail received time: Tue, 22 Jul 2025 21:34:55

Sent: Tuesday, July 22, 2025 5:34:55 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Sincerely,

Kanwaldeep Sekhon
vytor.tsfc@gmail.com
8014 263rd Street
Glen Oaks , New York 11004

Archived: Wednesday, July 30, 2025 8:50:59 AM

From: amenoartemis@gmail.com

Mail received time: Tue, 22 Jul 2025 21:38:12

Sent: Tuesday, July 22, 2025 5:38:13 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Sincerely,

amenoartemis@gmail.com
159 Santa Teresa
San Leandro, California 94579

Archived: Wednesday, July 30, 2025 8:51:04 AM

From: [Charles Wieland](#)

Mail received time: Tue, 22 Jul 2025 21:41:10

Sent: Tuesday, July 22, 2025 5:41:11 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Sincerely,

Charles Wieland
casper55@hush.com
206A Compton Circle
San Ramon, 94583

Archived: Wednesday, July 30, 2025 8:51:10 AM

From: [Jerry Lee](#)

Mail received time: Tue, 22 Jul 2025 21:43:41

Sent: Tuesday, July 22, 2025 5:43:42 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

Jerry Lee
jerryglee1102@gmail.com
2211 Legacy Park Loop
Tuscaloosa , Alabama 35404

Archived: Wednesday, July 30, 2025 8:42:26 AM

From: [Jacoba Dolloff](#)

Mail received time: Tue, 22 Jul 2025 21:46:17

Sent: Tuesday, July 22, 2025 5:46:19 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

Jacoba Dolloff
coba@cox.net
4545 Taft Ave
La Mesa, California 91941

Archived: Wednesday, July 30, 2025 8:42:34 AM
From: [Dita \[EXTERNAL\]](#) <>RE: [Draft Environmental Asse](#)
Mail received time: Tue, 22 Jul 2025 21:57:26
Sent: Tuesday, July 22, 2025 5:57:27 PM
To: [chipsnepa](#)
Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001
Importance: Normal
Sensitivity: None

CHIPS Program Office CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Dita Škalič

dita.skalic@gmail.com

Levstikova ulica 4

Moravske Toplice, 9226

Archived: Wednesday, July 30, 2025 8:42:40 AM

From: [Laura Long](#)

Mail received time: Tue, 22 Jul 2025 22:00:13

Sent: Tuesday, July 22, 2025 6:00:14 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Sincerely,

Laura Long
lauralynn7@gmail.com
317 Shady Oaks Loop
Cedar Creek, Texas 78612-3396

Archived: Wednesday, July 30, 2025 8:42:46 AM

From: [Amanda Gordon](#)

Mail received time: Tue, 22 Jul 2025 22:00:20

Sent: Tuesday, July 22, 2025 6:00:21 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Sincerely,

Amanda Gordon
gordonsgoods407@gmail.com
828 Lighthouse Cove
Sanford, Florida 32773

Archived: Wednesday, July 30, 2025 8:42:51 AM

From: [H Ande](#)

Mail received time: Tue, 22 Jul 2025 22:02:55

Sent: Tuesday, July 22, 2025 6:02:56 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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CHIPS Program Office,

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Sincerely,

H Ande
shredbetty70@gmail.com
3310 69th st e
SSP, Minnesota 55075

Archived: Wednesday, July 30, 2025 8:42:57 AM

From: [Simone Fonseca](#)

Mail received time: Tue, 22 Jul 2025 22:09:16

Sent: Tuesday, July 22, 2025 6:09:17 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Sincerely,

Simone Fonseca
piteu36@yahoo.com
14584 Woodworth Way
Victorville, California 92394-0834

Archived: Wednesday, July 30, 2025 8:43:02 AM

From: [Jill Nicholas](#)

Mail received time: Tue, 22 Jul 2025 22:13:10

Sent: Tuesday, July 22, 2025 6:13:11 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Sincerely,

Jill Nicholas
jlnicholas@rochester.rr.com
45 Oak Hill Terrace
Penfield, New York 14526

Archived: Wednesday, July 30, 2025 8:43:07 AM

From: [James Deshotels](#)

Mail received time: Tue, 22 Jul 2025 22:21:25

Sent: Tuesday, July 22, 2025 6:21:31 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Sincerely,

James Deshotels
jdes@loyno.edu
161 Vondera Dr
Robertsville, Missouri 63072

Archived: Wednesday, July 30, 2025 8:43:13 AM

From: [Daniel polley](#)

Mail received time: Tue, 22 Jul 2025 22:22:52

Sent: Tuesday, July 22, 2025 6:22:53 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

Daniel polley
dannypolley@gmail.com
6201 N Wayne Ave apt 2
Chicago, Illinois 60660

Archived: Wednesday, July 30, 2025 8:43:19 AM

From: [Phoenix Giffen](#)

Mail received time: Tue, 22 Jul 2025 22:25:07

Sent: Tuesday, July 22, 2025 6:25:08 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

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- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
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Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

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Thank you for your consideration of my comments.

Sincerely,

Phoenix Giffen
phoenixgiffen@gmail.com
115 Bodega Ave
Petaluma, California 94952

Archived: Wednesday, July 30, 2025 8:43:24 AM

From: [Cory Hall](#)

Mail received time: Tue, 22 Jul 2025 22:30:20

Sent: Tuesday, July 22, 2025 6:30:21 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

Cory Hall

coryrose84@aol.com

94 Old Coach Rd

Clifton Park, New York 12065

Archived: Wednesday, July 30, 2025 8:43:29 AM

From: [Jace Mccabe](#)

Mail received time: Tue, 22 Jul 2025 22:37:49

Sent: Tuesday, July 22, 2025 6:37:50 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Sincerely,

Jace McCabe
mccabejace@gmail.com
Fairmount
Wichita, Kansas 67220

Archived: Wednesday, July 30, 2025 8:43:35 AM

From: smcobb@beechmere.com

Mail received time: Tue, 22 Jul 2025 22:42:44

Sent: Tuesday, July 22, 2025 6:42:45 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

smcobb@beechmere.com
3880 Ellendale Rd
Chagrin Falls, Ohio 44022

Archived: Wednesday, July 30, 2025 8:43:40 AM

From: [Louis Esposito](#)

Mail received time: Tue, 22 Jul 2025 22:43:48

Sent: Tuesday, July 22, 2025 6:43:50 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Sincerely,

Louis Esposito

lasurf4life@gmail.com

325 Marine Ave. Apt. #B8

Brooklyn, New York 11209

Archived: Wednesday, July 30, 2025 8:43:45 AM

From: [Lori Stefano](#)

Mail received time: Tue, 22 Jul 2025 22:51:31

Sent: Tuesday, July 22, 2025 6:51:33 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Sincerely,

Lori Stefano
lorilstefano@gmail.com
22440 Vale Court SE
Yelm, Washington 98597

Archived: Wednesday, July 30, 2025 8:43:50 AM

From: [Florence Carnahan](#)

Mail received time: Tue, 22 Jul 2025 22:52:56

Sent: Tuesday, July 22, 2025 6:52:57 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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As a 76 year old I see so many things that people will regret allowing to take over our future and the future of many generations to come. Just because some people think we'll all embrace these far fetched ideas doesn't mean they should happen without more lengthy and involved investigation.

Thank you for your consideration of my comments.

Sincerely,

Florence Carnahan
fjcarnahan@gmail.com
2023 McClellan Street
Schenectady, New York 12309

Archived: Wednesday, July 30, 2025 8:43:55 AM

From: [Steven Andrychowski](#)

Mail received time: Tue, 22 Jul 2025 23:00:05

Sent: Tuesday, July 22, 2025 7:00:07 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Sincerely,

Steven Andrychowski
vvcsteve@yahoo.com
105 Clinic Dr
New Britain, Connecticut 06051

Archived: Wednesday, July 30, 2025 8:44:00 AM

From: [Jason Crawford](#)

Mail received time: Tue, 22 Jul 2025 23:06:21

Sent: Tuesday, July 22, 2025 7:06:23 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely, Jason Crawford.

Jason Crawford
jrobcraft@aol.com
10 S. Prince St Apt 408
Lancaster, Pennsylvania 17603

Archived: Wednesday, July 30, 2025 8:44:06 AM

From: pittaylor@gmail.com

Mail received time: Tue, 22 Jul 2025 23:07:12

Sent: Tuesday, July 22, 2025 7:07:14 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

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- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
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Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,

pitttaylor@gmail.com

55 Camino Soledad

San Jose , New Mexico 87565

Archived: Wednesday, July 30, 2025 8:44:11 AM

From: caswank1@gmail.com

Mail received time: Tue, 22 Jul 2025 23:11:44

Sent: Tuesday, July 22, 2025 7:11:45 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

caswank1@gmail.com

69 Michigan Dr

Reading, Pennsylvania 19608

Archived: Wednesday, July 30, 2025 8:44:16 AM

From: [Tobey Thatcher](#)

Mail received time: Tue, 22 Jul 2025 23:18:38

Sent: Tuesday, July 22, 2025 7:18:38 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

Tobey Thatcher
thtaz2011@gmail.com
1170 W Quiet Glen Ct
Sahuarita, Arizona 85629

Archived: Wednesday, July 30, 2025 8:44:21 AM

From: [Laura Vera](#)

Mail received time: Tue, 22 Jul 2025 23:19:25

Sent: Tuesday, July 22, 2025 7:19:26 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Laura Vera
vera.ranch@gmail.com
2731 Mary Lane
Dickinson, Texas 77539

Archived: Wednesday, July 30, 2025 8:44:27 AM

From: [Barbara Johns](#)

Mail received time: Tue, 22 Jul 2025 23:26:09

Sent: Tuesday, July 22, 2025 7:26:10 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Sincerely,

Barbara Johns
barbarajohns20@gmail.com
5258 Wynnewood Road, Apt A, Apt A
Harrisburg, Pennsylvania 17109

Archived: Wednesday, July 30, 2025 8:44:32 AM

From: [Maureen Wahl](#)

Mail received time: Tue, 22 Jul 2025 23:33:56

Sent: Tuesday, July 22, 2025 7:33:57 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

Maureen Wahl
mwahl411@gmail.com
315 Waterside Rd
Northport , New York 11768

Archived: Wednesday, July 30, 2025 8:44:39 AM

From: [Lou Priem](#)

Mail received time: Tue, 22 Jul 2025 23:35:03

Sent: Tuesday, July 22, 2025 7:35:04 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Sincerely,

Lou Priem

loupriem@icloud.com

276 Van Yahres Rd

Cooperstown, New York 13326-4148

Archived: Wednesday, July 30, 2025 8:44:45 AM

From: [Steven M Rosenberg](#)

Mail received time: Tue, 22 Jul 2025 23:43:00

Sent: Tuesday, July 22, 2025 7:43:01 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Sincerely,

Steven M Rosenberg
sunydays33304@gmail.com
2424 Parkview Drive 10P, 10P
San Angelo, Texas 76904

Archived: Wednesday, July 30, 2025 8:44:51 AM

From: jim@jimyanda.net

Mail received time: Tue, 22 Jul 2025 23:46:38

Sent: Tuesday, July 22, 2025 7:46:39 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Sincerely,

jim@jimyanda.net
4 Main St Unit 595
Hurley, New York 12443

Archived: Wednesday, July 30, 2025 8:44:56 AM

From: aweeble25@gmail.com

Mail received time: Tue, 22 Jul 2025 23:47:38

Sent: Tuesday, July 22, 2025 7:47:40 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

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Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,

aweeble25@gmail.com
4301 S Bryant Ave apt 131
Del City, Oklahoma 73115

Archived: Wednesday, July 30, 2025 8:45:02 AM

From: [Jim Malone](#)

Mail received time: Tue, 22 Jul 2025 23:51:09

Sent: Tuesday, July 22, 2025 7:51:10 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,
Jim Malone

Jim Malone
ritajim12@gmail.com
12 Turvey Drive
Donabate, Fingal

Archived: Wednesday, July 30, 2025 8:45:08 AM

From: [Lenore Sivulich](#)

Mail received time: Tue, 22 Jul 2025 23:53:31

Sent: Tuesday, July 22, 2025 7:53:31 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

Lenore Sivulich
msivulic@maine.rr.com
47 Gloucester Hill Road
New Gloucester , Maine 04260

Archived: Wednesday, July 30, 2025 8:45:13 AM

From: [Lyle Funderburk](#)

Mail received time: Tue, 22 Jul 2025 23:55:56

Sent: Tuesday, July 22, 2025 7:55:57 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

Lyle Funderburk
lyle.funderburk@gmail.com
10003 SE Foster
Portland, Oregon 97266

Archived: Wednesday, July 30, 2025 8:45:18 AM

From: [Jessica Rollins](#)

Mail received time: Wed, 23 Jul 2025 00:02:59

Sent: Tuesday, July 22, 2025 8:03:01 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Jessica Rollins
littlezen67@aol.com
6435 Adahi Drive
Independence, Kentucky 41051

Archived: Wednesday, July 30, 2025 8:45:24 AM

From: [Marisa Morales](#)

Mail received time: Wed, 23 Jul 2025 00:03:11

Sent: Tuesday, July 22, 2025 8:03:16 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Sincerely,

Marisa Morales
marisamcawthorne@gmail.com
5767 Los Olivas Pt.
Parker, Colorado 80134

Archived: Wednesday, July 30, 2025 8:45:30 AM

From: vroundsa@gmail.com

Mail received time: Wed, 23 Jul 2025 00:12:51

Sent: Tuesday, July 22, 2025 8:12:52 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

vroundsa@gmail.com
1070 Elton Drive
Endicott, New York 13760

Archived: Wednesday, July 30, 2025 8:45:35 AM

From: sarank@mac.com

Mail received time: Wed, 23 Jul 2025 00:15:07

Sent: Tuesday, July 22, 2025 8:15:12 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

sarank@mac.com

1710 Bagley

Los Angeles, California 90035

Archived: Wednesday, July 30, 2025 8:45:41 AM

From: [Tracy marotta](#)

Mail received time: Wed, 23 Jul 2025 00:17:59

Sent: Tuesday, July 22, 2025 8:18:00 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Sincerely,

Tracy marotta
tracyrocks@gmail.com
322 Bay 14th Street
Brooklyn, New York 11214

Archived: Wednesday, July 30, 2025 8:45:47 AM

From: [Nicola Giorgio](#)

Mail received time: Wed, 23 Jul 2025 00:22:06

Sent: Tuesday, July 22, 2025 8:22:07 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

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- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
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Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,

Nicola Giorgio

ncl.grg@gmail.com

14 Jeff Rd

Largo, Florida 33774-2036

Archived: Wednesday, July 30, 2025 8:45:53 AM

From: [carolyn Massey](#)

Mail received time: Wed, 23 Jul 2025 00:31:08

Sent: Tuesday, July 22, 2025 8:31:09 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

carolyn Massey
claudia1112003@outlook.com
810 S 10th St
Quincy, Illinois 62301-5233

Archived: Wednesday, July 30, 2025 8:45:59 AM

From: [Maria Magana](#)

Mail received time: Wed, 23 Jul 2025 00:37:45

Sent: Tuesday, July 22, 2025 8:37:47 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

Maria Magana
mariamagana@gmail.com
1290 Hillcrest Drive
Burlington, Washington 98233

Archived: Wednesday, July 30, 2025 8:46:05 AM

From: [Susan Jordan](#)

Mail received time: Wed, 23 Jul 2025 00:43:55

Sent: Tuesday, July 22, 2025 8:43:57 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

Susan Jordan
honeygirl2361@gmail.com
2361 Unity Ave N
Golden Valley, Minnesota 55422-3411

Archived: Wednesday, July 30, 2025 8:46:10 AM

From: [Robert Renfro](#)

Mail received time: Wed, 23 Jul 2025 01:13:37

Sent: Tuesday, July 22, 2025 9:13:38 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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CHIPS Program Office,

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Sincerely,

Robert Renfro
ngongpingrrenfro@gmail.com
5789 East 9th Avenue
Denver, Colorado 80220-4568

Archived: Wednesday, July 30, 2025 8:46:18 AM

From: [Kate Skolnick](#)

Mail received time: Wed, 23 Jul 2025 01:24:11

Sent: Tuesday, July 22, 2025 9:28:06 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Sincerely,

Kate Skolnick

krs1123@gmail.com

40 W. 116th St., PH A1206

New York, New York 10026

Archived: Wednesday, July 30, 2025 8:46:24 AM

From: [Karen McCaw](#)

Mail received time: Wed, 23 Jul 2025 01:47:56

Sent: Tuesday, July 22, 2025 9:47:58 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

Karen McCaw
mccaw.karen@yahoo.com
4526 Mount Vernon Dr
Los Angeles, California 90043

Archived: Wednesday, July 30, 2025 8:46:29 AM

From: [Michael Garitty](#)

Mail received time: Wed, 23 Jul 2025 01:54:57

Sent: Tuesday, July 22, 2025 9:54:57 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Sincerely,

Michael Garitty
garitty@nccn.net
13088 Vista Knolls
Nevada City , California 95959

Archived: Wednesday, July 30, 2025 8:46:35 AM

From: [Richard Stern](#)

Mail received time: Wed, 23 Jul 2025 02:19:33

Sent: Tuesday, July 22, 2025 10:19:34 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Sincerely,

Richard Stern
rsisyh@yahoo.com
11 Riverside Dr
New York, New York 10023

Archived: Wednesday, July 30, 2025 8:46:41 AM

From: [Elizabeth Kelly](#)

Mail received time: Wed, 23 Jul 2025 02:25:40

Sent: Tuesday, July 22, 2025 10:25:40 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

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- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
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Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

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Thank you for your consideration of my comments.

Sincerely,

Elizabeth Kelly
simmygirl34@gmail.com
900 W Tyler St
Dalton, Georgia 30720

Archived: Wednesday, July 30, 2025 8:46:47 AM

From: [B. R. Lemonik](#)

Mail received time: Wed, 23 Jul 2025 03:00:07

Sent: Tuesday, July 22, 2025 11:00:08 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

B. R. Lemonik
earthjustice@eeyore18.info
240 Peekskill rd
Mahopac, New York 10541

Archived: Wednesday, July 30, 2025 8:46:53 AM

From: [James Campbell](#)

Mail received time: Wed, 23 Jul 2025 03:08:28

Sent: Tuesday, July 22, 2025 11:08:29 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Sincerely,

James Campbell
mcampbell641@gmail.com
400 LeRanch Blvd
Ridgway, Colorado 81432

Archived: Wednesday, July 30, 2025 8:46:58 AM

From: [Caephren McKenna](#)

Mail received time: Wed, 23 Jul 2025 03:41:31

Sent: Tuesday, July 22, 2025 11:41:32 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

Caephren McKenna
caephren@gmail.com
392 44th Street
Oakland, California 94609

Archived: Wednesday, July 30, 2025 8:47:03 AM

From: dcouchon@yahoo.com

Mail received time: Wed, 23 Jul 2025 03:46:31

Sent: Tuesday, July 22, 2025 11:46:32 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Sincerely,

dcouchon@yahoo.com
109 Foster Avenue
Elmira, New York 14905

Archived: Wednesday, July 30, 2025 8:47:10 AM

From: [John Stofko](#)

Mail received time: Wed, 23 Jul 2025 06:24:12

Sent: Wednesday, July 23, 2025 2:24:14 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

John Stofko
johnstofko@yahoo.com
431 North 10th Street
Allentown, Pennsylvania 18102

Archived: Wednesday, July 30, 2025 8:47:16 AM

From: [Andrej Beder](#)

Mail received time: Wed, 23 Jul 2025 06:36:21

Sent: Wednesday, July 23, 2025 2:36:22 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Sincerely,

Andrej Beder
beeeeeedo@gmail.com
8420 Kingston Pike
Knoxville, Tennessee 37919-5351

Archived: Wednesday, July 30, 2025 8:47:21 AM

From: [laura dickey](#)

Mail received time: Wed, 23 Jul 2025 07:04:55

Sent: Wednesday, July 23, 2025 3:04:55 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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CHIPS Program Office,

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Sincerely,

laura dickey
poetfire40@gmail.com
2879 route 23
newfoundland, New Jersey 07435

Archived: Wednesday, July 30, 2025 8:47:26 AM

From: [Pat Scowen](#)

Mail received time: Wed, 23 Jul 2025 07:12:51

Sent: Wednesday, July 23, 2025 3:12:52 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Pat Scowen

pat.scowen@icloud.com

Foxgloves, The Common, Surlingham

Norwich, England NR14 7AP

Archived: Wednesday, July 30, 2025 8:47:32 AM

From: [Marion Kraus](#)

Mail received time: Wed, 23 Jul 2025 08:15:23

Sent: Wednesday, July 23, 2025 4:15:25 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office CHIPS Program Office,

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.

- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.

- **Greenhouse Gases:** The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar –and without relying on renewable energy credits or using renewable energy that is already on the grid – to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- **Job Access, Housing & Transportation.** The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while

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Thank you for your consideration of my comments.

Sincerely,

Marion Kraus

krausies@web.de

Kantstr. 2

Heidenheim, Baden-Württemberg 89522

Archived: Wednesday, July 30, 2025 8:47:37 AM

From: [Abbie Bernstein](#)

Mail received time: Wed, 23 Jul 2025 08:21:33

Sent: Wednesday, July 23, 2025 4:21:35 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Abbie Bernstein
hedgebeast@aol.com
1245 N Kings Rd Apt 7
West Hollywood, California 90069

Archived: Wednesday, July 30, 2025 8:47:43 AM

From: merylpinque@gmail.com

Mail received time: Wed, 23 Jul 2025 09:53:26

Sent: Wednesday, July 23, 2025 5:53:28 AM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

merylpinque@gmail.com

615 Odlin Rd

Bangor, Maine 04401

Archived: Wednesday, July 30, 2025 8:47:48 AM

From: pupycom123@yahoo.es

Mail received time: Wed, 23 Jul 2025 10:27:32

Sent: Wednesday, July 23, 2025 6:27:34 AM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

pupycom123@yahoo.es

Avinguda Corts Catalanes, 530

Sant Adrián del Besos, Cataluna 08930

Archived: Wednesday, July 30, 2025 8:47:53 AM

From: kdeckel@maritime.edu

Mail received time: Wed, 23 Jul 2025 10:40:45

Sent: Wednesday, July 23, 2025 6:40:46 AM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

kdeckel@maritime.edu

31 Chippewa Dr

Buzzards Bay, Massachusetts 02532-4426

Archived: Wednesday, July 30, 2025 8:47:58 AM

From: [Corry Paul](#)

Mail received time: Wed, 23 Jul 2025 12:20:20

Sent: Wednesday, July 23, 2025 8:20:21 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

Corry Paul
corrypaul@gmail.com
1602 Forest Ave
Nashville, Tennessee 37206

Archived: Wednesday, July 30, 2025 8:48:03 AM

From: [Serena Becker](#)

Mail received time: Wed, 23 Jul 2025 12:31:11

Sent: Wednesday, July 23, 2025 8:31:11 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Sincerely,

Serena Becker
serenabecker@gmail.com
4871 Bethel Rd
Cazenovia, New York 13035

Archived: Wednesday, July 30, 2025 8:48:09 AM

From: [Mercedes Lackey](#)

Mail received time: Wed, 23 Jul 2025 12:33:38

Sent: Wednesday, July 23, 2025 8:33:39 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Sincerely,

Mercedes Lackey
helloelsie@gmail.com
16525 E 470 RD
CLAREMORE, Oklahoma 74017

Archived: Wednesday, July 30, 2025 8:48:14 AM

From: sgronim@rcn.com

Mail received time: Wed, 23 Jul 2025 13:10:38

Sent: Wednesday, July 23, 2025 9:10:39 AM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office CHIPS Program Office,

While I recognize the eagerness with which the Governor and other elected officials want to stimulate the economy of central New York, the huge Micron project may bring more drags on the economy and well-being of the region than benefits.

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Sincerely,

sgronim@rcn.com

35 PROSPECT PARK WEST
BROOKLYN, New York 11215

Archived: Wednesday, July 30, 2025 8:48:20 AM

From: hotep_amen@yahoo.com

Mail received time: Wed, 23 Jul 2025 13:12:10

Sent: Wednesday, July 23, 2025 9:12:10 AM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
- **Greenhouse Gases:** The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar –and without relying on renewable energy credits or using renewable energy that is already on the grid – to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,

hotep_amen@yahoo.com

1041 41st

Long Island City, New York 11101

Archived: Wednesday, July 30, 2025 8:48:27 AM

From: [Timothy Judson](#)

Mail received time: Wed, 23 Jul 2025 13:50:16

Sent: Wednesday, July 23, 2025 9:50:17 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Timothy Judson
judson.tim@gmail.com
103 Rugby Road
Syracuse, New York 13206

Archived: Wednesday, July 30, 2025 8:48:34 AM

From: harrigan5500@mindspring.com

Mail received time: Wed, 23 Jul 2025 15:02:00

Sent: Wednesday, July 23, 2025 11:02:01 AM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

harrigan5500@mindspring.com
p.o. box343
Kennesaw, Georgia 30156

Archived: Wednesday, July 30, 2025 8:48:40 AM

From: [david casales](#)

Mail received time: Wed, 23 Jul 2025 15:23:46

Sent: Wednesday, July 23, 2025 11:23:47 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPs Program Office,

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Thank you for your consideration of my comments.

Sincerely,

david casales

david@agreeny.org

GEDEES ST.

SYRACUSE, New York 13204

Archived: Wednesday, July 30, 2025 8:48:46 AM

From: [Jackie Stolfi](#)

Mail received time: Wed, 23 Jul 2025 15:30:08

Sent: Wednesday, July 23, 2025 11:30:09 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPs Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Jackie Stolfi
jacqueline4sight@aol.com
267 Harbor Ln
Massapequa Park, New York 11762

Archived: Wednesday, July 30, 2025 8:48:52 AM

From: melissahoffmann5@gmail.com

Mail received time: Wed, 23 Jul 2025 16:05:40

Sent: Wednesday, July 23, 2025 12:05:41 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

melissahoffmann5@gmail.com
188 Mill st
Poughkeepsie, New York 12601

Archived: Wednesday, July 30, 2025 8:48:58 AM

From: [El. Pe.](#)

Mail received time: Wed, 23 Jul 2025 16:16:36

Sent: Wednesday, July 23, 2025 12:16:37 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

El. Pe.

liz1952@gmail.com

Po Box 178

Santa Rosa, CA, California 95481

Archived: Wednesday, July 30, 2025 8:49:04 AM

From: [AJ Ruther](#)

Mail received time: Wed, 23 Jul 2025 16:25:44

Sent: Wednesday, July 23, 2025 12:25:45 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Micron will destroy our environment, climate, and communities. It's absolutely unacceptable that we're giving billions of dollars of taxpayer and ratepayer handouts to a massive corporation when there's not even a guarantee that the resulting jobs will go to our community or be good, union jobs. Micron will also use more energy than the entire state of Vermont, none of which is guaranteed to be renewable. I urge you to reject Micron's proposal to come to CNY entirely. We need an investment in jobs that our community actually needs instead, like lead remediation and social services.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

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Thank you for your consideration of my comments.

Sincerely,

AJ Ruther

aruther.ny@gmail.com

2 Town Garden Drive, Apt. 10

Liverpool, New York 13088

Archived: Wednesday, July 30, 2025 8:49:10 AM

From: [Leigh Swanker](#)

Mail received time: Wed, 23 Jul 2025 17:13:48

Sent: Wednesday, July 23, 2025 1:13:49 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. I find the 45 day comment period on a 20,000 page document to be an inadequate time frame to purposefully and accurately read and thoroughly understand the depth of this project. I can only assume that this minute time period is due to the many issues that are not positive for the environment and surrounding communities and thus the shortened time frame. What is being hidden here? By being this covert in this response time, it clearly leads to deception being felt by many community members and the truth is not truly being told. Again, there has been no public response to the petition that was signed. Again, what are you hiding? Therefore I am requesting that this comment period be extended to at least October 25, 2025. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** I bet none of you live here and are worried about the flooding from the removal of these wetlands but I do live here and am very concerned about the flooding. Will you be the agency we sue when our yard and home floods from the lack of appropriate watershed? If not, please provide me with the agency or will it be Micron or McMahon himself that will be responsible so I can prepare for such litigation. Yes, I know that you are replacing some watershed/wetlands at a rate of 2:1 or 3:1 but those are not connected and therefore will not assist in the flooding issues. The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss. Now, about the displaced animals. Again who do I send the bill to when I have an insane number of animals being displaced and they are now attempting to live under my shed or house. Who shall I send the bill to when I have to hire an animal control specialist to trap and relocate? Please determine the numbers of beavers, weasels, mink,

raccoons, snakes and other animal species and how, what your plan is to assist them in migrating to a safer habitat.

- Protection of Air, Water, and Workers. The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. What is the plan to prevent transportation accidents from occurring? There must be a safety plan. Please disclose this safety plan and where and how these forever chemicals will be taken for storage. Will Clay NY be the next Love Canal? Will there be litigation for years and millions have been paid out for leakage of these chemicals such as Alcoa, Honeywell, and DuPont? How will Micron protect our community and its workers? Do you know what a million gallons of sludge looks like? I didn't either until I realized that it is the same capacity as 74 24 foot round swimming pools.

- Greenhouse Gases: The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. What is Micron's plan to be 'green'. How will they generate the type of power that is necessary to power 1, 2, 3, and then the 4th fab? Has it taken into consideration that CNY does not get much sun in the winter months? How many solar panels will it take or wind turbines will it take to create this 'green' energy? The DEIS report does not address these issues which I would like answered. This report does not address how the upgrades to energy systems or water systems will be paid for. Please address these issues. Again is this something that you want to hide from the public as you need them to pay for these upgrades? Please provide a comprehensive plan from Micron and how they must create a comprehensive plan to generate or purchase renewable energy using wind and solar and geothermal and without relying on renewable energy credits or using renewable energy that is already on the grid – to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront This issue and demand a response from Micron.

Highways:

Has anyone who wrote this DEIS report been through the Rt 11 & Rt 31 exchange during rush hour? What about on weekends? Has anyone been through the Rt 11 corridor between Reis Dr and Bear Rd on the weekends after 10 am? Please provide an extensive report on this traffic situation and how a truck going in and out of this site at the rate of 1 truck a minute during the 16 year construction period will affect the traffic. I have read how Rt 81 will be diverted at the exits but as we know, this takes months, years to complete. Shouldn't this be done first before trucks begin rolling? Yes, there is going to be a RR extension. Again, this takes time. Please provide a more thorough mitigation plan on the traffic with time lines and how it will be mitigated at the start.

With progress comes devastation to our environment. This must be how the Native Americans must have felt with 'Manifest Destiny'. However we need to ensure that we do not become the next largest polluted area of the country. Do we really want another Onondaga Lake on our

hands? Please provide answers to the above requests as well as providing the comment time to extend until October 25, 2025.

Thank you for your consideration of my comments.

Sincerely,

Leigh Swanker

Leigh Swanker
swank6179@gmail.com
4962 Greenberry Dr
Clay, New York 13041

Archived: Wednesday, July 30, 2025 8:49:16 AM

From: [Judith Ackerman](#)

Mail received time: Wed, 23 Jul 2025 17:21:15

Sent: Wednesday, July 23, 2025 1:21:15 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,

Judith Ackerman
ackerson@yahoo.com
636 west End Av
Ny, New York 10024

Archived: Wednesday, July 30, 2025 8:49:23 AM

From: [Olivia Whitmarsh](#)

Mail received time: Wed, 23 Jul 2025 17:24:41

Sent: Wednesday, July 23, 2025 1:24:42 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

A concerned educator

Olivia Whitmarsh

olwhitma@esf.edu

1 Forestry Drive

Syracuse, New York 13210

Archived: Wednesday, July 30, 2025 8:49:30 AM

From: [Terrie Smith](#)

Mail received time: Wed, 23 Jul 2025 17:40:53

Sent: Wednesday, July 23, 2025 1:40:54 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Terrie Smith
sugarfootc@aol.com
1221 Portola Ave
Spring Valley, California 91977-4529

Archived: Wednesday, July 30, 2025 8:49:36 AM

From: care4animals@hotmail.co.uk

Mail received time: Wed, 23 Jul 2025 17:46:50

Sent: Wednesday, July 23, 2025 1:46:51 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
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Thank you for your consideration of my comments.

Sincerely,

care4animals@hotmail.co.uk
1612 Woodglen Ln
Altadena, California 91001

Archived: Wednesday, July 30, 2025 8:49:42 AM

From: [Khadeejah Ahmad](#)

Mail received time: Wed, 23 Jul 2025 18:06:08

Sent: Wednesday, July 23, 2025 2:06:09 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Khadeejah Ahmad
info@jobstomoveamerica.org
102 Sherbrooke Rd.
Manlius, New York 13104

Archived: Wednesday, July 30, 2025 8:49:47 AM

From: [Jacalyn Dinhofer](#)

Mail received time: Wed, 23 Jul 2025 18:29:50

Sent: Wednesday, July 23, 2025 2:29:51 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
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Thank you for your consideration of my comments.

Sincerely,

Jacalyn Dinhofer
jdinhofer@gmail.com
16 West 16 Street
NY, New York 10011

Archived: Wednesday, July 30, 2025 8:49:53 AM

From: [Patrick BOOT](#)

Mail received time: Wed, 23 Jul 2025 19:20:59

Sent: Wednesday, July 23, 2025 3:21:00 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Patrick BOOT

psi-wines@wanadoo.fr

320 Avenue du Père Prévost

Montpellier, Occitanie 34090

Archived: Wednesday, July 30, 2025 8:49:58 AM

From: [Aimee Morein](#)

Mail received time: Wed, 23 Jul 2025 19:57:19

Sent: Wednesday, July 23, 2025 3:57:20 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

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Thank you for your consideration of my comments.

Sincerely,

Aimee Morein
photochk611@gmail.com
3296 Maricopa Highway
Ojai, California 93023

Archived: Wednesday, July 30, 2025 8:50:03 AM

From: [Daniel Gremillion](#)

Mail received time: Wed, 23 Jul 2025 20:06:12

Sent: Wednesday, July 23, 2025 4:06:13 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

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Thank you for your consideration of my comments.

Sincerely,

Daniel Gremillion
frenchcreoledanny@gmail.com
216 Stonefield Rd.
Syracuse, New York 13205

Archived: Wednesday, August 13, 2025 9:30:32 AM

From: [Anandita Kumar](#)

Mail received time: Wed, 23 Jul 2025 20:50:53

Sent: Wednesday, July 23, 2025 4:50:55 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Anandita Kumar

ananditakumar96@gmail.com

53 Griffin Rd.

Westford, Massachusetts 01886

Archived: Wednesday, August 13, 2025 9:30:39 AM

From: [Jill Robinson](#)

Mail received time: Wed, 23 Jul 2025 20:51:45

Sent: Wednesday, July 23, 2025 4:51:46 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

Jill Robinson
jillr1017@gmail.com
4690 Grange Road
Clay, New York 13041

Archived: Wednesday, August 13, 2025 9:30:47 AM

From: [Rachel Brown](#)

Mail received time: Wed, 23 Jul 2025 20:56:14

Sent: Wednesday, July 23, 2025 4:56:15 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

Rachel Brown
rachel_anne_brown@hotmail.com
2647 30th St.
Astoria, New York 11102

Archived: Wednesday, August 13, 2025 9:30:54 AM

From: [Jen Horowitz](#)

Mail received time: Wed, 23 Jul 2025 21:46:06

Sent: Wednesday, July 23, 2025 5:46:07 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Jen Horowitz

jenhorowitz3@gmail.com

55 Bonnie Meadow Road,

Scarsdale, New York 10583

Archived: Wednesday, August 13, 2025 9:31:01 AM

From: [Eugene Blum](#)

Mail received time: Wed, 23 Jul 2025 22:13:54

Sent: Wednesday, July 23, 2025 6:13:55 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Eugene Blum

gab2799@gmail.com

•• 5650 Parliament Ln

Delavan, Wisconsin 53115

Archived: Wednesday, August 13, 2025 9:26:50 AM

From: [Elijah L.](#)

Mail received time: Thu, 24 Jul 2025 01:17:33

Sent: Wednesday, July 23, 2025 9:17:34 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

Elijah L.
infectedtitan97@gmail.com
6724 Rita Ave
Huntington Park , 90256

Archived: Wednesday, August 13, 2025 9:26:59 AM

From: 1942info@gmail.com

Mail received time: Thu, 24 Jul 2025 06:47:15

Sent: Thursday, July 24, 2025 2:47:16 AM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

1942info@gmail.com
3668 Cascades Drive
Fayetteville, 17222

Archived: Wednesday, August 13, 2025 9:27:06 AM

From: [John Coffey](#)

Mail received time: Thu, 24 Jul 2025 11:09:18

Sent: Thursday, July 24, 2025 7:09:19 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
- **Greenhouse Gases:** The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar –and without relying on renewable energy credits or using renewable energy that is already on the grid – to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

John Coffey

Sincerely,

John Coffey

coffeyjohnp@aol.com

903 Erie Park

Shortsville , New York 14548

Archived: Wednesday, August 13, 2025 9:27:14 AM

From: [Meredith Mohr](#)

Mail received time: Thu, 24 Jul 2025 13:09:43

Sent: Thursday, July 24, 2025 9:09:45 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
- **Greenhouse Gases:** The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar –and without relying on renewable energy credits or using renewable energy that is already on the grid – to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,

Meredith Mohr
meredithmohr2@gmail.com
7 Maple Court
Elkton, Maryland 21921

Archived: Wednesday, August 13, 2025 9:27:21 AM

From: [Deb Sosnowski](#)

Mail received time: Thu, 24 Jul 2025 13:19:33

Sent: Thursday, July 24, 2025 9:19:34 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPs Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss. We demand a clear plan for wetland restoration and its continued monitoring to ensure its ecological function is realized and maximized. This project should not result in a net loss for wetland habitat and flood mitigation.
- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols. We do not want another superfund site de-valuing property and quality of life in upstate NY down the road.
- **Greenhouse Gases:** The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using

wind and solar –and without relying on renewable energy credits or using renewable energy that is already on the grid – to meet New York State’s climate change objectives and the requirements of the New York Green CHIPS Act.

Affordable and abundant water and energy: The DEIS does not ensure Micron’s massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,

Deb Sosnowski
deb.sosnowski@gmail.com
1506 Court St.
Syracuse, New York 13208

Archived: Wednesday, August 13, 2025 9:27:28 AM

From: [Elio Mugnaini](#)

Mail received time: Thu, 24 Jul 2025 15:19:03

Sent: Thursday, July 24, 2025 11:19:04 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
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Thank you for your consideration of my comments.

Sincerely,

Elio M.

Elio Mugnaini
mugelsis@livecom.it
10 D. Veneziano Street
Florence - Italy, 50100

Archived: Wednesday, August 13, 2025 9:28:46 AM

From: [Chris Travis](#)

Mail received time: Thu, 24 Jul 2025 18:40:41

Sent: Thursday, July 24, 2025 2:40:42 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

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I think MICRON should develop a partnership with the City of Syracuse such that the City can apply for cost-share for the renovation, rehabilitation and improved energy efficiency of existing housing stock in the City of Syracuse. If MICRON is truly committed to helping those historically and systematically disadvantaged communities, this public-private partnership could provide a boon to worker enthusiasm, provide a strong base for community relations, and make those City residents working for MICRON, proud to do so.

Perhaps the City and MICRON could implement this for one city block as a demonstration project with the intent of building positive community relations and building housing for their workers.

Thank you for your consideration of my comments.

Sincerely,

Chris Travis
chrisdtravis@yahoo.com
2901 West Genesee St
Syracuse, New York 13219

Archived: Wednesday, August 13, 2025 9:28:53 AM

From: [A.L. Steiner](#)

Mail received time: Thu, 24 Jul 2025 19:07:52

Sent: Thursday, July 24, 2025 3:07:54 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
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Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,

A.L. Steiner
asteinerny@gmail.com
1299 Cornwallville RD.
Cornwallville, New York 12418

Archived: Wednesday, August 13, 2025 9:29:00 AM

From: [Sonja Nitschke](#)

Mail received time: Thu, 24 Jul 2025 19:08:04

Sent: Thursday, July 24, 2025 3:08:05 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
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Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,

Sonja Nitschke
sonjanitschke@gmail.com
116 Malverne Dr
Syracuse , New York 13208

From: Donna Gataletto <noreply@adv.actionnetwork.org>
Sent: Monday, July 28, 2025 11:35 AM
To: chipsnepa
Subject: [EXTERNAL] Environmental Concerns

CHIPS Program Office CHIPS Program Office,

I have the following concerns about the Micron project:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
- **Greenhouse Gases:** The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar –and without relying on renewable energy credits or using renewable energy that is already on the grid – to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Donna Gataletto

Donna Gataletto

deegmail@yahoo.com

110 Hallmore Dr

Camillus, New York 13031

Archived: Wednesday, July 30, 2025 7:28:28 AM

From: [Carol Hinkelman](#)

Mail received time: Fri, 25 Jul 2025 02:00:03

Sent: Thursday, July 24, 2025 10:00:03 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPs Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I am particularly concerned about water pollution with PFAS and other chemicals. My drinking water and that of thousands of other people comes from Lake Ontario where these chemicals will end up. I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
- **Greenhouse Gases:** The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar –and without relying on renewable energy credits or using renewable energy

that is already on the grid – to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,

Carol Hinkelman
carolhroc@gmail.com
348 Ripplewood Dr.
Rochester, New York 14616

Archived: Wednesday, July 30, 2025 7:28:33 AM

From: [Mark Hollinrake](#)

Mail received time: Fri, 25 Jul 2025 07:41:16

Sent: Friday, July 25, 2025 3:41:18 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

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Thank you for your consideration of my comments.

Sincerely,

Mark Hollinrake
markhollinrake1993@gmail.com
35 Morningside Av
New York , New York 10026

Archived: Wednesday, July 30, 2025 7:27:04 AM

From: [Karen McGuinness](#)

Mail received time: Fri, 25 Jul 2025 23:22:23

Sent: Friday, July 25, 2025 7:22:24 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Karen McGuinness
mindgarden1112@aol.com
40 Highland Ave
Hazlet , New Jersey 07730

Archived: Wednesday, July 30, 2025 7:27:14 AM

From: thorndebbie@comcast.net

Mail received time: Sat, 26 Jul 2025 20:16:36

Sent: Saturday, July 26, 2025 4:16:37 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

thorndebbie@comcast.net
900 290th Ave Se
Fall City, Washington 98024

Archived: Wednesday, July 30, 2025 7:27:20 AM

From: [Rebecca Berlant](#)

Mail received time: Sun, 27 Jul 2025 15:00:56

Sent: Sunday, July 27, 2025 11:00:57 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Rebecca Berlant
rsberlant@aol.com
183 15th St.
Brooklyn, New York 11215

Archived: Wednesday, July 30, 2025 7:27:25 AM

From: [Daniel Gremillion](#)

Mail received time: Sun, 27 Jul 2025 19:17:51

Sent: Sunday, July 27, 2025 3:17:53 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Sincerely,

Daniel Gremillion
frenchcreoledanny@gmail.com
216 Stonefield Rd
Syracuse , New York 13205

Archived: Wednesday, July 30, 2025 7:27:31 AM

From: [Mal Wetlands](#)

Mail received time: Sun, 27 Jul 2025 19:27:33

Sent: Sunday, July 27, 2025 3:27:34 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Sincerely,

Mal Wetlands
mgsmith1000@gmail.com
6008 Bay Hill Cir
Jamesville, New York 13078

Archived: Wednesday, July 30, 2025 7:27:38 AM

From: annjaeunlee@gmail.com

Mail received time: Sun, 27 Jul 2025 19:45:11

Sent: Sunday, July 27, 2025 3:45:12 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

annajaeunlee@gmail.com

99 Gorge Rd

Edgewater, New Jersey 07020-1095

Archived: Wednesday, July 30, 2025 7:27:44 AM

From: [Candace Rocha](#)

Mail received time: Sun, 27 Jul 2025 21:37:34

Sent: Sunday, July 27, 2025 5:37:34 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

Candace Rocha
candace8027@gmail.com
4423 Alpha St
Los Angeles, California 90032

Archived: Wednesday, July 30, 2025 7:27:49 AM

From: [Stephanie Cuellar](#)

Mail received time: Mon, 28 Jul 2025 06:56:01

Sent: Monday, July 28, 2025 2:56:03 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Sincerely,

Stephanie Cuellar
stephaniecuellar67@gmail.com
43-06 46ST APT 2D
Sunnyside, New York 11104

Archived: Wednesday, July 30, 2025 7:27:55 AM

From: [Rachael Propp](#)

Mail received time: Mon, 28 Jul 2025 13:35:52

Sent: Monday, July 28, 2025 9:35:52 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
- **Greenhouse Gases:** The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar –and without relying on renewable energy credits or using renewable energy that is already on the grid – to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,
Rachael Propp
Fayetteville, NY

PS. We have technology tools to help us rebuild the community to make it safe for humans and tech to thrive side by side.

Rachael Propp
rachaelpopp86@icloud.com
5100 Highbridge Street , 6B
Fayetteville, New York 13066

Archived: Wednesday, July 30, 2025 7:28:00 AM

From: [Khadeejah Ahmad](#)

Mail received time: Mon, 28 Jul 2025 14:05:25

Sent: Monday, July 28, 2025 10:05:26 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1600 residents of the region asking for more time.

In addition, I request that you hold additional public hearings at MULTIPLE locations. The hearings held at Liverpool H.S. are a good start, but that location is not accessible to county residents who lack a car. I request that you hold a public hearing in downtown Syracuse--easily accessed via Centro bus service, and several other locations, in the evening.

The Micron project will have major effects on the health and welfare of our region for the next 50+ years. It deserves a thorough review with public engagement.

Sincerely,

Khadeejah Ahmad

info@jobstomoveamerica.org

102 Sherbrooke Rd.

Manlius, New York 13104

Archived: Wednesday, July 30, 2025 7:28:06 AM

From: [Grace Ukoha](#)

Mail received time: Mon, 28 Jul 2025 15:06:05

Sent: Monday, July 28, 2025 11:06:07 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on-site wetlands loss, and address the watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, groundwater, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts of habitat loss.
- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety, given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize the use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
- **Greenhouse Gases:** The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar –and without relying on renewable energy credits or using renewable energy that is already on the grid – to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water, nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g., education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron, particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower-cost market-rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed-income affordable, climate-friendly, and safe housing while protecting the affordability of existing housing for current residents.

Sincerely,

Grace Ukoha
gugruggle@gmail.com
493 S Summit Dr.
Holts Summit, Missouri 65043

Archived: Wednesday, July 30, 2025 7:28:12 AM

From: deevounas@yahoo.com

Mail received time: Mon, 28 Jul 2025 15:36:03

Sent: Monday, July 28, 2025 11:36:04 AM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
- **Greenhouse Gases:** The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar –and without relying on renewable energy credits or using renewable energy that is already on the grid – to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,

deevounas@yahoo.com
2 Lakeview Cir
Skaneateles, New York 13152

Archived: Wednesday, July 30, 2025 7:28:17 AM

From: [Leigh Swanker](#)

Mail received time: Mon, 28 Jul 2025 18:53:49

Sent: Monday, July 28, 2025 2:53:50 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for allowing the public to ask questions that I understand will be answered prior to any ground breaking and building of this plant. I am requesting that you extend the 45 day comment period to be at least 120 days or until October 25, 2025 as it is incomprehensible that someone could read and understand a 20,000 document in this 45 day period.

Second, I urge your consideration and response to the following issues and concerns:

- What specifically are the PFAS 'forever chemicals' that will be used and what is the method of transportation to the plant? Now, even with the best safety plans, accidents occur. So, with this in mind, what are the health risks associated with each chemical within 1 year, 5 year, 10 year and 20 year of exposure such as through ground water seepage etc. Are these chemicals used anywhere else in the county? This 20,000 page document does not disclose the actual chemicals that would be used and it cannot be proprietary as I am not asking for the actual formulas with percentages of each used. I am concerned for the residents, workers and wildlife.

In the other areas of the USA, where Micron has plants, what are the PFAS levels in the air and water? Now comparatively to size, as none of those plants will be this large, please provide what the volume comparison is of these levels with 4 fabs.

Micron is pledging to meet 100% renewable energy. How will this be done? Please be specific as to the number of solar panels and windmills it will take to power one fab. When this is published, then we can all multiply by 4 to understand how many it will take to power 4 fabs. How much energy will it take to power the daycare, water treatment plant, and the offices? Where will all of these solar panels and windmills be placed? Will more land need to be acquired?

Thank you for your consideration of my comments and I look forward to hearing responses from my questions.

Sincerely,
Leigh Swanker

Leigh Swanker
swank6179@gmail.com

4962 Greenberry Dr
Clay, New York 13041

Archived: Wednesday, July 30, 2025 7:28:22 AM

From: [Francesco Rizzo](#)

Mail received time: Tue, 29 Jul 2025 00:34:04

Sent: Monday, July 28, 2025 8:34:05 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
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Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,
Francesco

Francesco Rizzo
far11@georgetown.edu
112 W. Heman St
East Syracuse, New York 13057

Archived: Thursday, July 31, 2025 10:50:58 AM

From: [Vail Varone](#)

Mail received time: Tue, 29 Jul 2025 16:09:45

Sent: Tuesday, July 29, 2025 12:09:46 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office CHIPs Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. I am a resident of Brooklyn, NY that spends significant time with family in Central New York. I am deeply concerned and troubled.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
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requirements of the New York Green CHIPS Act.

Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

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Thank you for your consideration of my comments.

Sincerely,
Vail Varone

Vail Varone
varonevail@gmail.com
66 Brooklyn Ave
Brooklyn, 11216

Archived: Thursday, July 31, 2025 10:50:30 AM

From: [Douglas Randall](#)

Mail received time: Tue, 29 Jul 2025 17:32:54

Sent: Tuesday, July 29, 2025 1:32:55 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] Re: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for your consideration of my comments.

First, the DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. It's important that MICRON create a comprehensive plan to generate or purchase renewable energy credits using wind and solar power.

Also, DEIS doesn't ensure Micron's energy and water use will not affect the affordability of energy and clean water. Ratepayers and tax dollars should not be used for infrastructure upgrades. MICRON certainly has the resources to address this issue.

Regards,

Douglas Randall
Syracuse, New York

Douglas Randall
bflo66@yahoo.com
125 Richard Rd
Syracuse, New York 13215

Archived: Thursday, July 31, 2025 10:50:37 AM

From: [Ron Vannorstrand](#)

Mail received time: Tue, 29 Jul 2025 18:04:31

Sent: Tuesday, July 29, 2025 2:04:32 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Ron Vannorstrand
ron@vannorstrandlaw.com
100 Janet Drive
SYRACUSE, NY, New York 13224

Archived: Thursday, July 31, 2025 10:50:42 AM

From: [gary maggi](#)

Mail received time: Tue, 29 Jul 2025 18:18:34

Sent: Tuesday, July 29, 2025 2:18:35 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

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Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

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Thank you for your consideration of my comments.

Sincerely,

gary maggi
garysmaggi@gmail.com
4964 Old Peck Hill Road
Jamesville, New York 13078

Archived: Thursday, July 31, 2025 10:50:48 AM

From: [Scott Bassett](#)

Mail received time: Tue, 29 Jul 2025 23:31:16

Sent: Tuesday, July 29, 2025 7:31:18 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
- **Greenhouse Gases:** The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar –and without relying on renewable energy credits or using renewable energy that is already on the grid – to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,

Scott Bassett
carbietron@gmail.com
5240 39th drive, 4n
Woodside, New York 11377

Archived: Thursday, July 31, 2025 10:50:53 AM

From: skorman06@gmail.com

Mail received time: Wed, 30 Jul 2025 05:27:01

Sent: Wednesday, July 30, 2025 1:27:03 AM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
- **Greenhouse Gases:** The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar –and without relying on renewable energy credits or using renewable energy that is already on the grid – to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,

skorman06@gmail.com

271-10 Grand Central Pkwy., Apt. 28K

Floral Park, New York 11005

Archived: Monday, August 4, 2025 12:56:27 PM

From: [Shawn Finlinson](#)

Mail received time: Wed, 30 Jul 2025 17:16:11

Sent: Wednesday, July 30, 2025 1:16:12 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPs Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. I would like to say that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025 at a minimum. Note that there has been no public response to a petition signed by over 1500 residents of the region asking for the same.

Based on my current understanding of the DEIS, I still want to highlight the environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. This is particularly important in light of the historical misuse and contamination of Onondaga Lake by corporate interests--this must never be allowed to happen again.

It's critical that the following considerations issues are addressed and responded to:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
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that is already on the grid – to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

- Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,

Shawn Finlinson
shawnfinlinson@yahoo.com
68 Downing St
Brooklyn, New York 11238

Archived: Monday, August 4, 2025 12:56:34 PM

From: [Kate Lucey](#)

Mail received time: Thu, 31 Jul 2025 16:45:38

Sent: Thursday, July 31, 2025 12:45:39 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
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Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

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Thank you for your consideration of my comments.

Sincerely,

Kate Lucey
klucey54@gmail.com
10 Madison Street
Hamilton, New York 13346

Archived: Monday, August 4, 2025 12:56:37 PM

From: [Shatara Walker](#)

Mail received time: Thu, 31 Jul 2025 22:20:04

Sent: Thursday, July 31, 2025 6:20:15 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

The cost of living in housing for those who already live in Onondaga County. Wages have not increased, yet houses and apartments are no longer affordable to those who reside within Onondaga county. With the insane raise of the housing market over the last three years, my mother-in-law is no longer able to purchase her own home. I cannot afford to get my own apartment. Once Micron is established, electric bills, water bills will skyrocket on top of unfordable mortgages and rents unless you had purchased a home years ago.

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
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Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,
Shatara Walker

Shatara Walker
shataraw311@gmail.com
6860 Benedict Rd
East Syracuse, New York 13057

Archived: Monday, August 4, 2025 12:56:41 PM

From: [Yvonne Taylor](#)

Mail received time: Thu, 31 Jul 2025 22:24:48

Sent: Thursday, July 31, 2025 6:24:49 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
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Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

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Thank you for your consideration of my comments.

Sincerely,

Yvonne Taylor
gasfreesenecagirl@gmail.com
PO Box 776
Burdett , New York 14818

Archived: Monday, August 4, 2025 12:56:45 PM

From: [Thyais Brown-Newball](#)

Mail received time: Thu, 31 Jul 2025 23:22:07

Sent: Thursday, July 31, 2025 7:22:08 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
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Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,

Thyais Brown-Newball
tnadji@gmail.com
480 Lefferts Ave.
Brooklyn, New York 11225

Archived: Monday, August 4, 2025 12:56:49 PM

From: [Melissa Carlson](#)

Mail received time: Fri, 1 Aug 2025 00:45:23

Sent: Thursday, July 31, 2025 8:45:24 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same.

PLEASE PAY ATTENTION TO THOSE LOCALS WHO WILL BE MOST AFFECTED!

THERE IS LOTS OF LIFE IN THE CURRENT WATERSHED: PLANTS, ANIMALS, MICROBES. THEY ARE IN A HEALTHY BALANCE THAT HUMANS CANNOT EASILY REPLICATE OR EXPECT TO 'SHIFT' TO ANOTHER PIECE OF LAND.

MICRON ITSELF WILL BE CREATING MORE POLLUTION DURING OPERATIONS, NOT JUST CONSTRUCTION. HOW WILL THAT BE CONTAINED AND PROCESSED SO AS NOT TO CONTINUE HARMING THE ENVIRONMENT AND THE LOCAL LIVES: MICROBES, PLANTS, ANIMALS AND HUMANS?

PLEASE ASK ALL THE LOCALS - NOT JUST THE ONES WITH THE LOUDEST VOICES. WHO IS TELLING YOU ABOUT THE LOW INCOME PEOPLE IN THE AREA. AND ALL THE OTHERS WITH LITTLE VOICE?

ALLOW A LONGER COMMENT PERIOD.

Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- Water and Ecological Resources. The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts

(including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.

- Protection of Air, Water, and Workers. The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.

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AGAIN, PAY ATTENTION TO THE LOCAL COMMUNITIES WHO WILL BE STRONGLY AFFECTED!

Thank you for your consideration of my comments.

Sincerely,

Melissa Carlson
melissacarlson22@gmail.com
246 Castlebar Rd
Rochester, New York 14610

Archived: Monday, August 4, 2025 12:56:53 PM

From: syidthekid521@gmail.com

Mail received time: Fri, 1 Aug 2025 05:46:06

Sent: Friday, August 1, 2025 1:46:06 AM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
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Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,
Syd

sydthekid521@gmail.com
5379 Mud Mill Rd
Brewerton, New York 13029

Archived: Monday, August 4, 2025 12:56:10 PM

From: htkeleher@gmail.com

Mail received time: Fri, 1 Aug 2025 10:28:28

Sent: Friday, August 1, 2025 6:28:29 AM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
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Thank you for your consideration of my comments.

Sincerely,

htkeleher@gmail.com
108 W. Pulteney St., Apt. 202
Corning, New York 14830

Archived: Monday, August 4, 2025 12:56:16 PM

From: taj269@gmail.com

Mail received time: Fri, 1 Aug 2025 16:11:46

Sent: Friday, August 1, 2025 12:11:47 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Respectfully,
Marilyn

taj269@gmail.com
269 Reed Ave
Syracuse, New York 13207

Archived: Monday, August 4, 2025 12:56:19 PM

From: [Leslie Lawrence](#)

Mail received time: Fri, 1 Aug 2025 17:30:18

Sent: Friday, August 1, 2025 1:30:19 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office CHIPS Program Office,

I am extremely disappointed in public officials lack of transparency. They kept the DEIS private while giving themselves 180+ days to read the thousands of pages. The public has just 45 days to take in this report which contains critical, life altering, technological information. It was released when many are on vacation and their attention is naturally elsewhere. One wonders what our officials are trying to hide. How does this restricted time to take in the DEIS serve constituents and the many people affected by this project?

Thank you for your consideration of my comments. There is still time to do the right thing and extend the time for the people to read the report and have public meetings.

Sincerely,

Leslie Lawrence

Leslie Lawrence

lelaw1963@gmail.com

102 Stoneridge Dr.

Syracuse, New York 13214

Archived: Monday, August 4, 2025 12:56:23 PM

From: [Gregory Spock](#)

Mail received time: Fri, 1 Aug 2025 17:51:09

Sent: Friday, August 1, 2025 1:51:10 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Gregory Spock
gregorymspock@gmail.com
24 Fraser Street
Village Of Pelham, New York 10803

Archived: Monday, August 4, 2025 12:48:40 PM

From: [Syd Kellogg](#)

Mail received time: Fri, 1 Aug 2025 18:32:41

Sent: Friday, August 1, 2025 2:32:43 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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I urge consideration and response to the following issues and concerns:

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Thank you for your consideration of my comments.

Sincerely,
Syd

Syd Kellogg
sydthekid521@gmail.com
5379 Mud Mill Rd
Brewerton, New York 13029

Archived: Monday, August 4, 2025 12:48:46 PM

From: [Diana Green](#)

Mail received time: Fri, 1 Aug 2025 22:59:06

Sent: Friday, August 1, 2025 6:59:08 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPs Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York despite the ridiculous short time for public comment. We Central New Yorkers know that this is a done deal, therefore my comments are directed at Micron's sense of responsibility. I went to many of the initial meetings where many promises were made and where I offered feedback and ideas from other organizations that could make positive suggestions to Micron, but never heard back from any of the organizers of these meetings or Micron. We also know President Trump has removed all federal environmental regulations on Micron and is pressuring them to remove any DEI commitments. I urge Micron to maintain its initial commitments. Here are my main concerns:

1. Micron will have a tremendous impact on our water and environment. Micron says it will cut 400 acres of trees and hundreds of acres of wetlands. Increasing tree acreage in the Northeast is the single most important thing we can do to reduce global warming, therefore I urge Micron to limit this destruction as much as they can. I urge Micron to use native plants on its grounds to provide habitat lost to this destruction and to use bird friendly glass in their buildings to mitigate the loss of birds, which are used to using the wetlands in this area.
2. There are many toxic chemicals in the production of microchips. In addition to being a risk to workers, ultimately these chemicals will end up back in our waters and I have not seen how Micron will limit this.
3. This project puts a burden on taxpayers, who are investing large amounts in it and whose sewage and infrastructure bills will skyrocket in the future.
4. How will Micron have zero emissions as they claim?
5. How will Micron offer reasonable housing and limit traffic pollution in the area?

I would like to support this project, but frankly I fear for the future of Central New York.

Sincerely, Diana Green

Diana Green
dgreen97@twcny.rr.com
4304 Abbey Road

Syracuse, New York 13215

Archived: Monday, August 4, 2025 12:48:50 PM

From: [Leslie Lawrence](#)

Mail received time: Sat, 2 Aug 2025 19:28:23

Sent: Saturday, August 2, 2025 3:28:24 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York.

The destruction of wetlands and the damage of nearby wetlands will be an enormous environmental loss. Our county seems to be full of housing and business developments built on wetlands. We are interfering with nature rather than adapting. These wetland store large amounts of carbon and are essential to slow the warming of our planet. What is Micron going to do to make up for the loss of carbon sequestration that the wetlands provide? The wetlands Micron are proposing will not store carbon approaching the amounts the present wetlands do for years. So what are Micron's plans for making up for the loss of carbon sequestration in the present?

Thank you for your consideration of my comments.

Sincerely,

Leslie Lawrence

Leslie Lawrence

lelaw1963@gmail.com

102 Stoneridge Dr.

Syracuse, New York 13214

Archived: Monday, August 4, 2025 12:48:53 PM

From: [Syd Kellogg](#)

Mail received time: Sat, 2 Aug 2025 21:17:57

Sent: Saturday, August 2, 2025 5:17:58 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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I urge consideration and response to the following issues and concerns:

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Thank you for your consideration of my comments.

Sincerely,
Syd

Syd Kellogg
sydthekid521@gmail.com
5379 Mud Mill Rd
Brewerton, New York 13029

Archived: Monday, August 4, 2025 12:48:57 PM

From: [Lynn House](#)

Mail received time: Sun, 3 Aug 2025 11:43:23

Sent: Sunday, August 3, 2025 7:43:24 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Lynn House
Lynnhouse59@gmail.com
5140 Lyle Dr
Clay, New York 13041

Archived: Monday, August 4, 2025 11:54:55 AM

From: [Dennis Lerner](#)

Mail received time: Sun, 3 Aug 2025 19:50:36

Sent: Sunday, August 3, 2025 3:50:37 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPs Program Office,

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I urge consideration and response to the following issues and concerns:

Micron's proposed development in Central New York is a welcome recognition of our community's assets and its history in fostering the success of innovative industries. Thank you for the opportunity to comment and pose questions regarding Micron's proposed Draft Environmental Impact Statement (DEIS).

I understand that the DEIS considers known and likely environmental impacts of the development and operation of the project as proposed; however, my question relates specifically to the lifecycle of the project. We here in Syracuse know painfully well, like many Eastern communities, that even the most locally originating industries can and do close, or leave for elsewhere. When they do, the community is left with what gets abandoned and left behind. In reviewing the Summary of the DEIS, I did not find consideration of what non-statutory obligations Micron, or others, are assuming with respect to restoring the site and remediating contamination on and off the project site.

As I understand it, the intent of this DEIS is to meet the permitting requirements for the full projected 46-year development of the project. Given the rapid and seemingly ever-accelerating rate of change, innovation, and consequent obsolescence, the DEIS does not appear to require further environmental impact analysis and remediation actions, as changes in Micron's operations occur. Grandfathering the treatment and remediation standards for a project that isn't expected to be operating at its planned capacity for nearly 50 years is unacceptable, given the certainty of changes in every aspect of plant operations over that timeframe. How will changes in environmental impacts be addressed?

Can you clarify what monitoring and reporting requirements Micron has with regard to planned and unanticipated changes in design, configuration, and operation of the facilities over their construction, operation, and closure?

With respect to the proposed two-to-one replacement of existing wetlands to be paved over for parking. What percent of the existing wetlands, if any, have standing or flowing water for more than a week following a rain event? Are the proposed scattered site replacement wetlands similar in terms of periods of standing or flowing water?

The DEIS catalogues the protected and endangered species affected by the loss of wetlands; however, no inventory or census is provided for other native plant and animal species, and how those will be preserved and protected. Is it Micron's position that only legally protected species are to be considered?

The DEIS identifies the installation of a 16" natural gas line to serve the development, and I believe 8 generators to be operated in groupings, but I did not see consideration, evaluation, or plans to cover the proposed parking area, and/or rooftops with photovoltaics, or wind-power generators as a partial offset to the impact of carbon byproduct release from combustion of natural gas. Why is the minimization of the project's carbon footprint not addressed?

As a global concern, each time the DEIS cites a condition of the project that is expected to have a material environmental impact, it is assumed that there is no feasible alternative, offset, or obligation to maintain a standard of best available technology throughout the project's lifecycle. Is there such an obligation and if not, why not?

The DEIS acknowledges that adaptation of relocated protected and endangered species to scattered-site wetlands will happen slowly. Why wasn't consideration given to the impact of relocation of these species to a consolidated site, or a consideration of what larger alternative sites might be available?

The DEIS makes reference to onsite waste treatment and storage. What provisions are there for the monitoring, securing, and proper disposal of hazardous and non-hazardous wastes?

The DEIS references the landfill disposal of non-hazardous wastes, since landfill space is limited and the demand competitive: what analyses does the DEIS make regarding the availability of adequate volumes of permitted landfill capacity, and or alternatives for waste reduction and reuse?

The DEIS does not consider the impacts of continuing and accelerating change in the climate from increased severity and length of high heat events, the increased flooding, erosion, and site drainage capacity required to deal with more and more severe storm events, and changes in water table height. While such climate effects cannot be accurately predicted, what consideration has been given to establishing a likely range of impacts and their respective offsets or mediation?

The project and community are slated to share utility capacity and infrastructure, and the presumption is that existing and proposed augmentations of such capacities will be sufficient for both project and community needs. Which gets priority if the aggregate available capacity is insufficient to meet the needs of the project and the community?

The DEIS considers both truck and train traffic impacts, but does not consider the impact on

commercial and private air traffic volumes based on project-related travel and the air travel needs of the thousands of added Central New York families employed directly and indirectly in connection with the project. Why not?

Thank you for your consideration of my comments.

Sincerely,

Dennis Lerner
120 E. Jefferson Street
#613
Syracuse, NY 12302
lerner.law2@gmail.com
315.439.3863

Dennis Lerner
lerner.law2@gmail.com
120 E. Jefferson ST #613
Syracuse, New York 13202

Archived: Monday, August 4, 2025 12:49:01 PM

From: [Cristofer Fernandez OFM Conv](#)

Mail received time: Mon, 4 Aug 2025 03:22:00

Sent: Sunday, August 3, 2025 11:22:01 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

To whom this will concern,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

As a Franciscan friar ecologist and a local minister working with the poor of Syracuse, I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
- **Greenhouse Gases:** The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using

wind and solar –and without relying on renewable energy credits or using renewable energy that is already on the grid – to meet New York State’s climate change objectives and the requirements of the New York Green CHIPS Act.

Affordable and abundant water and energy: The DEIS does not ensure Micron’s massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

"Simple" yet thoughtless gentrification is not the solution. I work with many low-income, poverty stricken families/children who are concerned about their future here in their own hometown. Couldn't Syracuse be a leader in social responsibility and sustainable development in a time like ours?

Thank you for your consideration of my comments.

Sincerely,

Cristofer Fernandez OFM Conv
cristofer.fernandez@olaprovince.org
812 N. Salina Street
Syracuse, New York 13208

Archived: Thursday, August 7, 2025 1:32:14 PM

From: [Cal Kirsch](#)

Mail received time: Mon, 4 Aug 2025 20:45:35

Sent: Monday, August 4, 2025 4:45:36 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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I urge consideration and response to the following issues and concerns:

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Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

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Thank you for your consideration of my comments.

Sincerely,

Cal Kirsch
mckirsch92@gmail.com
88 Tallman St
Oswego, New York 13126

Archived: Thursday, August 7, 2025 1:32:18 PM

From: coreanna@gmail.com

Mail received time: Tue, 5 Aug 2025 00:47:51

Sent: Monday, August 4, 2025 8:47:52 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
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Thank you for your consideration of my comments.

Sincerely,

coreanna@gmail.com
195 North Rd
Windsor, New York 13865

Archived: Thursday, August 7, 2025 1:32:23 PM

From: [Syd Kellogg](#)

Mail received time: Tue, 5 Aug 2025 16:10:01

Sent: Tuesday, August 5, 2025 12:10:02 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Syd Kellogg

sydthekid521@gmail.com

5379 Mud Mill Rd

Brewerton, New York 13029

Archived: Thursday, August 7, 2025 1:32:27 PM

From: [A.L. Steiner](#)

Mail received time: Tue, 5 Aug 2025 16:19:07

Sent: Tuesday, August 5, 2025 12:19:08 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPs Program Office,

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I urge consideration and response to the following issues and concerns:

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Thank you for your consideration of my comments.

Sincerely,

A.L. Steiner
asteinerny@gmail.com
1299 Cornwallville RD.
Cornwallville, New York 12418

Archived: Thursday, August 7, 2025 1:32:31 PM

From: [Thyais Brown-Newball](#)

Mail received time: Tue, 5 Aug 2025 16:58:08

Sent: Tuesday, August 5, 2025 12:58:10 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Thyais Brown-Newball
tnadji@gmail.com
480 Lefferts Ave.
Brooklyn, New York 11225

Archived: Thursday, August 7, 2025 1:32:36 PM

From: [Judy Schmid](#)

Mail received time: Tue, 5 Aug 2025 18:31:10

Sent: Tuesday, August 5, 2025 2:31:12 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Judy Schmid
schmid@twcny.rr.com
110 Windham Dr
Syracuse, New York 13224

Archived: Thursday, August 7, 2025 1:32:40 PM

From: [Karen Ryon](#)

Mail received time: Tue, 5 Aug 2025 20:03:25

Sent: Tuesday, August 5, 2025 4:03:27 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

John L. Ryon, III
Karen L. C. Ryon
305 Pleasant Street
Manlius, NY 13104

Onondaga County Industrial Development Agency
Attn: Micron Project
335 Montgomery Street, 2nd Floor
Syracuse, NY 13202
CHIPSNEPA@chips.gov

8/4/2025

To Whom It May Concern:

We would like to begin our comment by stating we are in favor of the Micron Project. However, considering the scope of the project we would appreciate;

1. More time for public comment before advancing to the EIS, not necessarily into October but an extension, nonetheless,
2. Much clearer and specific mitigation measures to be taken addressing;
 - a. Streams, rivers & lakes degradation
 - b. Water waste/industrial waste minimization
 - c. PFAS control (where will the ~ 100,000,000 tons of PFAS go), asphyxiants, spills (55 million gallons on-site, hazardous waste)
 - d. Utility use & who pays for how much, since we will become a "load pocket" vs. supplier?
 - e. Heat Island Affect (i.e., parking for 12,000 cars, in conventional parking lot = 15-20 acres of asphalt). Stacked structure to reduce footprint?
 - f. Wildlife & endangered species – protection?
 - g. Why use only fossil fuels? Wind? Solar?
 - h. Wetlands – typically take decades to recover.

We have both held various positions in our local Village government. We had a 140 acre parcel of land slated for clear cutting for development re-designated as a CEA. Karen was ZBA Chair & member & chair of our Planning Board. We became familiar with (albeit modest

comparatively) DEIS documents. It became apparent that size and volume became somewhat of a technique to distract.

We are thoroughly impressed with the skilled professionals who took on the challenge of 20,000 pages. They spoke clearly and succinctly regarding some of our concerns mentioned above.

It would be interesting to compare documents with their other sites in Manassas, VA & Boise, Idaho. We discovered that a former applicant to our Planning Board used statistics from an entirely different site with nothing similar.

We know that Micron has the skill and capability to clearly, simply address these concerns without the immense volume of pages. Our area is blessed with ample, clean, fresh water. The Great Lakes hold roughly 20% of the world's surface freshwater. Let's keep our water & air clean and safe for generations to come.

Thank you for your consideration.

Sincerely,

The Ryon's

Karen Ryon
ryon1051@gmail.com
305 Pleasant St
Manlius, New York 13104

Archived: Thursday, August 7, 2025 1:32:45 PM

From: susan@silverwaters.com

Mail received time: Tue, 5 Aug 2025 20:22:16

Sent: Tuesday, August 5, 2025 4:22:17 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York.

In addition to the comments below I would submit that the location of this facility over karst bedrock is highly questionable. So is the "remediation" for the destruction of the high quality wetland habitat that is being destroyed. And I do believe the influx of workers will make housing in the area LESS affordable at a time when many government programs are going under.

Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

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- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.

- Greenhouse Gases: The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar –and without relying on renewable energy credits or using renewable energy that is already on the grid – to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

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Thank you for your consideration of my comments.

Sincerely,
Susan P. Gateley

susan@silverwaters.com
14550 lake st
sterling, New York 13156

Archived: Thursday, August 7, 2025 1:31:52 PM

From: [Leslie Lawrence](#)

Mail received time: Tue, 5 Aug 2025 23:02:09

Sent: Tuesday, August 5, 2025 7:02:11 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPs Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York.

The size of the buildings and the size of the parking lots mean that rainstorms will result in lots more water onsite and running offsite. As this is an area that already has flooding issues how is Micron going deal with high water close to the site and downstream. With the size of the parking lots one can only imagine the size of the snow mountains and the flooding when they melt. How will Micron deal with super sized flooding events? Are there plans for permeable parking lot pavement?

Thank you for your consideration of my comments.

Sincerely,

Leslie Lawrence

Leslie Lawrence

lelaw1963@gmail.com

102 Stoneridge Dr.

Syracuse, New York 13214

Archived: Thursday, August 7, 2025 1:31:56 PM

From: [Beth Darlington](#)

Mail received time: Wed, 6 Aug 2025 01:21:11

Sent: Tuesday, August 5, 2025 9:21:13 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Beth Darlington
bedarlington@vassar.edu
124 Raymond Avenue, Box 323
Poughkeepsie, New York 12604-0323

Archived: Thursday, August 7, 2025 1:31:59 PM

From: ddaloise@yahoo.com

Mail received time: Wed, 6 Aug 2025 02:39:23

Sent: Tuesday, August 5, 2025 10:39:25 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

ddaloise@yahoo.com

36 S Bay DR

Massapequa, New York 11758

Archived: Thursday, August 7, 2025 1:32:03 PM

From: [Louis Esposito](#)

Mail received time: Wed, 6 Aug 2025 02:39:38

Sent: Tuesday, August 5, 2025 10:39:40 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

Louis Esposito
lasurf4life@gmail.com
325 Marine Ave. Apt. #B8
Brooklyn, New York 11209

Archived: Thursday, August 7, 2025 1:25:03 PM

From: [Jan Emerson](#)

Mail received time: Wed, 6 Aug 2025 02:44:52

Sent: Tuesday, August 5, 2025 10:44:53 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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CHIPS Program Office,

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Thank you.

Sincerely,

Jan Emerson
janemerson777@gmail.com
250 Fort Washington Ave Apt 5B
New York, New York 10032

Archived: Thursday, August 7, 2025 1:25:09 PM

From: [Beth Darlington](#)

Mail received time: Wed, 6 Aug 2025 02:45:45

Sent: Tuesday, August 5, 2025 10:45:46 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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CHIPS Program Office,

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Sincerely,

Beth Darlington
bedarlington@vassar.edu
124 Raymond Avenue, Box 323
Poughkeepsie, New York 12604-0323

Archived: Thursday, August 7, 2025 1:25:12 PM

From: yayoi@zerowasteithaca.org

Mail received time: Wed, 6 Aug 2025 02:48:06

Sent: Tuesday, August 5, 2025 10:48:07 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

yayoi@zerowasteithaca.org

Aurora St

Ithaca, New York 14850

Archived: Thursday, August 7, 2025 1:25:17 PM

From: [Calvin Kirsch](#)

Mail received time: Wed, 6 Aug 2025 02:49:25

Sent: Tuesday, August 5, 2025 10:49:27 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Calvin Kirsch
ckirsch92@duck.com
88 Tallman Street
Oswego, New York 13126

Archived: Thursday, August 7, 2025 1:25:21 PM

From: [Jodie Leidecker](#)

Mail received time: Wed, 6 Aug 2025 08:02:29

Sent: Wednesday, August 6, 2025 4:02:31 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Jodie Leidecker
jodieleidecker@gmail.com
334 Lott avenue
Brooklyn, New York 11212

Archived: Thursday, August 7, 2025 1:25:26 PM

From: [Renee Frontale](#)

Mail received time: Wed, 6 Aug 2025 11:25:26

Sent: Wednesday, August 6, 2025 7:25:28 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
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Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,
Renee frontale

Renee Frontale
ssfrontale@twcny.rr.com
7133 Totman Drive
Cicero, New York 13039

Archived: Thursday, August 7, 2025 1:25:30 PM

From: [Richard Stern](#)

Mail received time: Wed, 6 Aug 2025 11:46:05

Sent: Wednesday, August 6, 2025 7:46:06 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Richard Stern
rsisyh@yahoo.com
11 Riverside Dr
New York, New York 10023

Archived: Thursday, August 7, 2025 1:25:34 PM

From: [Sheila Out](#)

Mail received time: Wed, 6 Aug 2025 11:46:25

Sent: Wednesday, August 6, 2025 7:46:25 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Sheila Out
sheilaout49@gmail.com
247 Valley Rd
Ithaca, New York 14850

Archived: Thursday, August 7, 2025 1:25:38 PM

From: [Erin Zaika](#)

Mail received time: Wed, 6 Aug 2025 12:49:17

Sent: Wednesday, August 6, 2025 8:49:18 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,
Erin zaika

Erin Zaika
elmarie119@gmail.com
8300 Silvia Path
Clay, New York 13041

Archived: Thursday, August 7, 2025 1:25:45 PM

From: [Madeleine Bort](#)

Mail received time: Wed, 6 Aug 2025 12:55:39

Sent: Wednesday, August 6, 2025 8:55:40 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely, Madeleine Bort

Madeleine Bort
r45m46@yahoo.com
308 Elm Street
Fayetteville , New York 13066

Archived: Thursday, August 7, 2025 1:25:50 PM

From: lizcarivan@gmail.com

Mail received time: Wed, 6 Aug 2025 13:00:20

Sent: Wednesday, August 6, 2025 9:00:22 AM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

lizcarivan@gmail.com
10 Regent Street
Albany, New York 12202

Archived: Thursday, August 7, 2025 1:25:54 PM

From: [Barton Schoenfeld](#)

Mail received time: Wed, 6 Aug 2025 13:07:50

Sent: Wednesday, August 6, 2025 9:07:51 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Barton Schoenfeld
bschoenfeld@taconic.net
67 Grey Fox Lane
Valatie, New York 12184

Archived: Thursday, August 7, 2025 1:25:58 PM

From: [Kanwaldeep Sekhon](#)

Mail received time: Wed, 6 Aug 2025 13:09:38

Sent: Wednesday, August 6, 2025 9:09:40 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

Kanwaldeep Sekhon
vytor.tsfc@gmail.com
8014 263rd Street
Glen Oaks , New York 11004

Archived: Thursday, August 7, 2025 1:26:02 PM

From: [Karen Galster](#)

Mail received time: Wed, 6 Aug 2025 13:27:30

Sent: Wednesday, August 6, 2025 9:27:31 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Karen Galster
kgalster16@gmail.com
8840 new country dr
Cicero, New York 13039

Archived: Thursday, August 7, 2025 1:26:06 PM

From: [Theodore Smith](#)

Mail received time: Wed, 6 Aug 2025 14:10:54

Sent: Wednesday, August 6, 2025 10:10:56 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
- **Greenhouse Gases:** The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar –and without relying on renewable energy credits or using renewable energy that is already on the grid – to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,

Theodore Smith
tsmith@igc.org
465 South 15th Street
San Jose, California 95112

Archived: Thursday, August 7, 2025 1:26:10 PM

From: [Donald Banaszak](#)

Mail received time: Wed, 6 Aug 2025 14:11:46

Sent: Wednesday, August 6, 2025 10:11:47 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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I urge consideration and response to the following issues and concerns:

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Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

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Thank you for your consideration of my comments.

Sincerely,

Donald Banaszak
banazald@gmail.com
5331 Dean Rd.
Stockton, New York 14784

Archived: Thursday, August 7, 2025 1:26:13 PM

From: [Jane Slabowski](#)

Mail received time: Wed, 6 Aug 2025 14:13:53

Sent: Wednesday, August 6, 2025 10:13:53 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPs Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

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- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Our community killed one lake (Onondaga) over the past 100 years, and it's taken huge amounts of money and time to rectify that. (Some would say the solution is inadequate.). Please let's have the wisdom to avoid repeating past mistakes in Central NY. Please let's be pro-active in developing creative solutions to potential problems.

Thank you for your consideration of my comments.

Sincerely,
Jane Slabowski

Jane Slabowski
jslabowski@aol.com
1100 Cumberland Ave.
Syracuse, New York 13210

Archived: Thursday, August 7, 2025 1:26:17 PM

From: [Alyson Shotz](#)

Mail received time: Wed, 6 Aug 2025 14:23:58

Sent: Wednesday, August 6, 2025 10:23:58 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

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Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,

Alyson Shotz
signatures.carmaker214@passinbox.com
63 Flushing Ave
Brooklyn, New York 11205

Archived: Thursday, August 7, 2025 1:26:21 PM

From: [Maura Steff](#)

Mail received time: Wed, 6 Aug 2025 14:28:51

Sent: Wednesday, August 6, 2025 10:28:52 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPs Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite my submission of the following comments, I feel that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and I also understand that there has been no public response to a petition signed by over 1500 residents of the region asking the same. This is a lengthy document full of technical terms and it is also written way above the majority of the general public's comprehension or reading ability/level. Many of those people will be the most effected by any adverse impacts.

Having lived in this community for almost 40 years I feel I have a good sense of the area and it's history. I am hoping that we have learned something from what happened at Onondaga Lake when it became an industrial dumping ground in the 19th century. At that time there was not as much information out there about what impacts their actions could have, but we know better now. But we also know we don't know everything about long term effects.

I grew up near the Hanford Atomic Works in Washington State. My dad was a research scientist there. Everyone's dad worked there in some capacity. We used to go in the outer areas of the reservation and pick asparagus. It was the Wonder Years life of the 1960's and 70's with kids riding bikes, chasing tumbleweeds, and skipping stones on the Columbia River. We moved to the east coast when I was 15 for another job opportunity. I missed my life there. Speed ahead to 1999, I was diagnosed with breast cancer. I heard of another former neighbor a few years older than me being diagnosed as well. I was a 37 year old mother of 2 small children with no history of breast cancer in the family and in fact, subsequent genetic testing did not show anything for the known mutations.

I am not adverse to having Micron in the area. God knows the area needs jobs and some money infusion, but is this done at the cost of the next generation? There are so many things we don't know about the chemicals in our lives, but we do know a lot more than folks did in the 1800's.

So how can Micron be a good neighbor or really a good member of this community? Don't rush this assessment through, be transparent in monitoring, have plans to make changes as issues arise, treat the community as they are your family, your loved ones. My son and his family live

near the site. I fear for their continued quality of water, their safety on the roads during construction and operation, their clean air, and any potential flooding on their property which is already an issue due to the Eco-systems in the area.

Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.

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- **Greenhouse Gases:** The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar –and without relying on renewable energy credits or using renewable energy that is already on the grid – to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- **Job Access, Housing & Transportation.** The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. From my experience with other industry growth, many times workers from outside the area are the folks that get the jobs. Not the locals. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate

friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,
Maura Harling Stefl

Maura Stefl
mhstefl@gmail.com
106 Clarmar Rd.
Fayetteville, New York 13066

Archived: Thursday, August 7, 2025 1:26:25 PM

From: [Frankie Rowan](#)

Mail received time: Wed, 6 Aug 2025 14:32:35

Sent: Wednesday, August 6, 2025 10:32:36 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

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Thank you for your consideration of my comments.

Sincerely,

Frankie Rowan
frankierowan05@gmail.com
125 Gertrude Street
Syracuse, New York 13203

Archived: Thursday, August 7, 2025 1:26:29 PM

From: kahkej398@gmail.com

Mail received time: Wed, 6 Aug 2025 14:48:24

Sent: Wednesday, August 6, 2025 10:48:25 AM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

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Thank you for your consideration of my comments. I fear we are being lax regarding our environment, already under stress, in pursuit of economic growth.

Sincerely,

kahkej398@gmail.com

398 NY-69

Williamstown, New York 13493

Archived: Thursday, August 7, 2025 1:26:33 PM

From: [Anne Rabe](#)

Mail received time: Wed, 6 Aug 2025 15:19:40

Sent: Wednesday, August 6, 2025 11:19:40 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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I urge amendments to the DEIS to address the following outstanding problems.

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
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Thank you for your consideration of my comments.

Sincerely,

Anne Rabe
Don't Waste NY

Anne Rabe
annerabe@msn.com
1265 Maple Hill Rd.
CASTLETON ON HUDSON, New York 12033

Archived: Thursday, August 7, 2025 1:26:38 PM

From: [Bradley Smith](#)

Mail received time: Wed, 6 Aug 2025 15:25:50

Sent: Wednesday, August 6, 2025 11:25:52 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
- **Greenhouse Gases:** The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar –and without relying on renewable energy credits or using renewable energy that is already on the grid – to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,
Bradley

Bradley Smith
smithbl.ole@gmail.com
426 Long Branch Cir
Liverpool, New York 13090

Archived: Thursday, August 7, 2025 1:26:41 PM

From: [Beth Darlington](#)

Mail received time: Wed, 6 Aug 2025 15:44:49

Sent: Wednesday, August 6, 2025 11:44:49 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Beth Darlington
bedarlington@vassar.edu
124 Raymond Avenue, Box 323
Poughkeepsie, New York 12604-0323

Archived: Thursday, August 7, 2025 1:26:46 PM

From: [Anne Wilcox](#)

Mail received time: Wed, 6 Aug 2025 15:54:26

Sent: Wednesday, August 6, 2025 11:54:26 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** Without the due diligence needed to address hydrological and ecological issues Micron's proposed projects could have significant ill effects on our valuable wetlands, watershed, ground water, and the natural habitats of hundreds of species native to this land.
- The Syracuse area in particular has been devastated by water contaminations decades ago resulting in the dead Onadaga lack. We can not afford to jeopardize our clean water with further developments that do not take into adequate account of the fall out of its expansion. The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron is should not be allowed to proceed without accountability and re-thinking of their harmful designs for these regions.

We need to be smarter about our future and not succumb to short-sided planning that endangers people, the environment, our water and land.

Thank you for your consideration of my comments.

Sincerely,
Anne Harris Wilcox

Anne Wilcox
awilcoxh@ur.rochester.edu

570 Linden St
Rochester, New York 14620-2421

Archived: Thursday, August 7, 2025 1:26:49 PM

From: [David Friedman](#)

Mail received time: Wed, 6 Aug 2025 15:54:28

Sent: Wednesday, August 6, 2025 11:54:29 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York.

I urge consideration and response to the following issues and concerns:

Micron plans to fill or drain almost 200 acres of wetlands. Eliminating these will increase the risk of flooding, not only to nearby communities but to the plant itself. While Micron plans to restore wetlands in other areas to compensate for the loss, these new wetlands are not located downstream from the plant - and will therefore not mitigate the risk of flooding. Additionally, the original wetlands currently store considerable amounts of carbon; their elimination will increase greenhouse gases, something the country can ill afford.

Sincerely,

David Friedman
Fayetteville, NY

David Friedman
duvbab@aol.com
100 Margo Lane
Fayetteville, New York 13066-1529

Archived: Thursday, August 7, 2025 1:26:53 PM

From: [Anna Endreny](#)

Mail received time: Wed, 6 Aug 2025 15:56:31

Sent: Wednesday, August 6, 2025 11:56:32 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York.

I urge consideration and response to the following issues and concerns:

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Thank you for your consideration of my comments.

Sincerely,
Anna Endreny

Anna Endreny
annaendreny@gmail.com
2104 Euclid Avenue
Syracuse, New York 13224

Archived: Thursday, August 7, 2025 1:26:58 PM

From: [Mark Hollinrake](#)

Mail received time: Wed, 6 Aug 2025 16:14:41

Sent: Wednesday, August 6, 2025 12:14:42 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Mark Hollinrake
markhollinrake1993@gmail.com
35 Morningside Av
New York , New York 10026

Archived: Thursday, August 7, 2025 1:27:02 PM

From: [Syd Kellogg](#)

Mail received time: Wed, 6 Aug 2025 16:20:21

Sent: Wednesday, August 6, 2025 12:20:23 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Syd Kellogg

sydthekid521@gmail.com

5379 Mud Mill Rd

Brewerton, New York 13029

Archived: Thursday, August 7, 2025 1:27:07 PM

From: [Jill Nicholas](#)

Mail received time: Wed, 6 Aug 2025 16:34:16

Sent: Wednesday, August 6, 2025 12:34:17 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Jill Nicholas
jlnicholas@rochester.rr.com
45 Oak Hill Terrace
Penfield, New York 14526

Archived: Thursday, August 7, 2025 1:27:11 PM

From: [Moira Ashleigh](#)

Mail received time: Wed, 6 Aug 2025 16:34:47

Sent: Wednesday, August 6, 2025 12:34:48 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Moira Ashleigh
moira@solsticesun.com
427 Front St
Owego, New York 13827

Archived: Thursday, August 7, 2025 1:27:15 PM

From: [Laurel Flanagan](#)

Mail received time: Wed, 6 Aug 2025 16:55:31

Sent: Wednesday, August 6, 2025 12:55:31 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,
Laurel Flanagan

Laurel Flanagan
flanaganlaurel4@gmail.com
6200 Palisades Dr.
Cicero, New York 13039

Archived: Thursday, August 7, 2025 1:27:20 PM

From: [Gillian McManus](#)

Mail received time: Wed, 6 Aug 2025 17:53:29

Sent: Wednesday, August 6, 2025 1:53:30 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

The proposal is vast, vague in many areas that must be more fully considered, has many potentially harmful effects on the environment, its wetlands and the local population and wildlife, is too costly in electricity demands, and will take many years of disruption and billions of dollars to complete. Given the prevalence of flooding in wetlands areas, contamination can be spread at any time and toxics could shoot above allowable levels.

All in all, this is a very dangerous project for the climate, the land, and the people of the area. It should be limited to a smaller project or eliminated altogether, certainly until a proper EIS is completed. More community input and a longer time to comment is required.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including

best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.

- **Greenhouse Gases:** The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar –and without relying on renewable energy credits or using renewable energy that is already on the grid – to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- **Job Access, Housing & Transportation.** The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,

Gillian McManus

jimac4@verizon.net

401 E. 81st St., NY, NY 10028 #15C

New York, New York 10028-5811

Archived: Thursday, August 7, 2025 1:27:24 PM

From: [Traci Korbas](#)

Mail received time: Wed, 6 Aug 2025 18:23:48

Sent: Wednesday, August 6, 2025 2:23:49 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
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- **Greenhouse Gases:** The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar –and without relying on renewable energy credits or using renewable energy that is already on the grid – to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

All of these issues will have a large impact on this area which has been my home since I was born 45 years ago. I don't want to see another corporation come in with false promises and no follow through. Environmental impacts will affect countless generations in the area and it's such a beautiful place to see be destroyed. Please make sure that we aren't giving in to money and we are paying attention to what truly matters which is the people of the community now and for future generations.

Thank you for your consideration of my comments.

Sincerely,
Traci Korbas

Traci Korbas
rocnrollgrl@yahoo.com
231 Leonard St
Syracuse, New York 13211

Archived: Thursday, August 7, 2025 1:27:27 PM

From: [Thyais Brown-Newball](#)

Mail received time: Wed, 6 Aug 2025 18:34:03

Sent: Wednesday, August 6, 2025 2:34:04 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

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Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

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Thank you for your consideration of my comments.

Sincerely,

Thyais Brown-Newball
tnadji@gmail.com
480 Lefferts Ave.
Brooklyn, New York 11225

Archived: Thursday, August 7, 2025 1:27:32 PM

From: [Theresa Shaver](#)

Mail received time: Wed, 6 Aug 2025 18:49:29

Sent: Wednesday, August 6, 2025 2:49:31 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

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Thank you for your consideration of my comments.

Sincerely,

Theresa Shaver
starrbrite72@gmail.com
8714 E Patrol Rd
Baldwinsville, New York 13027

Archived: Thursday, August 7, 2025 1:27:36 PM

From: [Megan Kendzior](#)

Mail received time: Wed, 6 Aug 2025 18:52:43

Sent: Wednesday, August 6, 2025 2:52:43 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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I urge consideration and response to the following issues and concerns:

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Thank you for your consideration of my comments.

Sincerely,

Megan Kendzior
megan.kendzior@gmail.com
58 1/2 Albany Street
Cazenovia, New York 13035

Archived: Thursday, August 7, 2025 1:27:40 PM

From: [Sean Korbas](#)

Mail received time: Wed, 6 Aug 2025 19:19:17

Sent: Wednesday, August 6, 2025 3:19:18 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

An aquarium? That's your request for work life balance of your employees? How about invest in CNY wastewater infrastructure. City of Syracuse has its jewel of a lake polluted with any rain event due to decades old water treatment facility with combined sewer overflow. Please as an organization that will be coming to CNY STRICTLY for our water resources put in effort to improve water quality across CNY. Invest in the CITY OF SYRACUSE. Not just the suburbs. Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
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- **Greenhouse Gases:** The DEIS does not state how Micron will meet its own 100% renewable

energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar –and without relying on renewable energy credits or using renewable energy that is already on the grid – to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

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Thank you for your consideration of my comments.

Sincerely,

Sean M. Korbas (lifetime CNY resident)

Sean Korbas

seankrbs7@gmail.com

506 chestnut st

North Syracuse , New York 13212

Archived: Thursday, August 7, 2025 1:27:48 PM

From: [Christine Herrmann](#)

Mail received time: Wed, 6 Aug 2025 13:21:06

Sent: Wednesday, August 6, 2025 9:21:07 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] Your Environmental Assessment (EISX-006-55-CPO-001)

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

I live less than two miles from your proposed campus, and am asking you to extend the comment period to October 25, 2025, at a minimum. There has been no public response to a petition signed by over 1500 residents of the region, including myself, asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I'm most concerned about your planned project's impact on the local environment. The DEIS fails to adequately address these issues. Moreover, it fails to provide specific promises as to remediation of wetlands, let alone assurances as to on site wetlands loss, since flooding is such an issue; we are, as you may have noted, built in a swamp. The DEIS does not address watershed and habitat that will be destroyed. Your company absolutely needs to provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.

The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals. The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar – and without relying on renewable energy credits or using renewable energy that is already on the grid – to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act. We have already seen local increases in energy costs; the DEIS does not ensure Micron's massive energy and water use will not further affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project.

Lastly, the company's impact of local traffic, housing, and cost of living. The DEIS does not adequately explain how they plan to address traffic congestion while ensuring access. The DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,

Christine Herrmann
sirhc_warrior@yahoo.com
5574 Louis Ave
Brewerton, New York 13029

Archived: Thursday, August 7, 2025 1:28:56 PM

From: [Lily Leb](#)

Mail received time: Wed, 6 Aug 2025 19:07:27

Sent: Wednesday, August 6, 2025 3:07:27 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] Environmental Assessment

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

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Thank you for your consideration of my comments.

Sincerely,

Lily LeBlanc

Lily Leb

l.f.jarvis91@gmail.com

4901 Gorge Rd

Cazenovia, New York 13035

Archived: Thursday, August 7, 2025 1:31:38 PM

From: [Ronald Bort](#)

Mail received time: Wed, 6 Aug 2025 20:17:52

Sent: Wednesday, August 6, 2025 4:17:53 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

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- **Greenhouse Gases:** The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar –and without relying on renewable energy credits or using renewable energy that is already on the grid – to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely, Ronald G. Bort

Ronald Bort
r45m46@yahoo.com
308 Elm St.
Fayetteville, New York 13066

Archived: Thursday, August 7, 2025 1:31:44 PM

From: [Amanda Boyle](#)

Mail received time: Wed, 6 Aug 2025 20:18:50

Sent: Wednesday, August 6, 2025 4:18:51 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

While I am thankful that the Draft Environmental Impact Assessment for Micron was made available, I am deeply disappointed that only 45 days were allowed for the public comment period. I hope that you make the right choice and extend the comment period to October 25, 2025 to get a full sense of the community's thoughts, hopes, and concerns for the project.

There are many aspects of the projects that concern me, but I want to focus on those that impact me directly.

I am from Central New York. I came back to live in the area and have come to love how much nature and green spaces exist in this area, and the many ways one can enjoy their time in nature. As I have grown older and traveled, I have realized the amount and ease of access to green space like it exists in Central New York increasingly rare. Micron in the DEIS plan is dismissive and does not give due diligence in considering the massive environmental impacts it would have not just in Clay, or Onondaga county, but the larger Great Lakes region. The destruction of wetlands and watershed loss has always, historically, ended poorly. The fact also that the plant and the money it will make take precedent over threatened and endangered species is disappointing, especially in a state like New York that seems to pride itself on taking care of and protecting the natural environment. Additionally, the use of PFAS and other chemicals (that Micron has suspiciously not disclosed) that they may end up in the waste water and in Lake Ontario is deeply concerning. So much work has already been done to restore the damage that industries and pollution have had on the great lakes, and many people, including many of us in Onondaga county rely on the lake for the water we drink. The amount of greenhouses gases that would be produced by the plant, and the lack of information as to how the company plans to comply with NY's goals of becoming a zero emissions state by 2040 are concerning. As it stands, this plan does not account for the ways in which the production of the plant will disrupt and damage the environment, nor what will be done to minimize and repair the negative impact.

This was a place I saw myself spending the rest of my life, where I wanted to and could buy an affordable home, and have a family. But in the time since the Micron Plant announcement was made, I have started to feel this dream slip away. Already I am being priced out of the housing market which my real estate agent tells me is already being influenced by Micron. Each year my rent increases more than my salary does as a teacher, and I am constantly outbid on homes, homes whose sale prices supersede their actual worth. I am not going to be able to afford a

place to live if Micron's estimated influx of people further exacerbates the housing and rental market. How then will the families of my students whose families already struggle with housing costs survive? Micron needs to concretely and explicitly consider the impact on housing, transportation, and poverty especially for the residents already living in the area.

These are the following steps I would like to see taken at a minimum:

Allow and Ensure Community Oversight:

With uncertainties of this long-term project, Micron should be required to create and support a community-expert advisory and oversight committee which can help with on-going monitoring, environmental impacts assessment and response, and community engagement.

Scale Back the Project

Given recent proposals to build more Micron fabrication facilities elsewhere, Micron needs be required to further justify why 4 Fabrication Facilities are needed here. They also could be required to expand the DEIS to fully consider a smaller 2-Fab or 3-Fab (instead of 4-Fab) plan. A 2-Fab or 3-Fab facility would reduce the negative impacts on wetland and habitat loss

Poverty Reduction Plan

Micron needs to commit to actions that help reduce poverty, especially child poverty, in Onondaga County and the City of Syracuse. The DEIS should include an analysis of how the Micron development project will reduce and prevent poverty, especially child poverty.

Analysis of Housing Impacts

Micron needs to complete a housing analysis detailing the impacts of rising housing costs on the local community and plans to mitigate such impacts so that housing remains affordable. This plan could include specific details on how Micron plans to house all of their workers.

Wetland and Habitat Restoration

Micron should increase the wetland replacement ratio from 2:1 to 10 to 15:1, as was done for other projects. These wetlands could be in large continuous tracts that connect to grasslands and forests. Micron could also protect existing, mature wetlands in perpetuity, such as forested wetlands, floodplain forests or shrublands in the Oneida River and nearby watersheds.

Protect Existing Wetlands

Micron needs to commit to purchasing additional large areas of existing wetlands downstream of Micron, such as along the Oneida River floodplain, to protect in perpetuity through the TWT or the CNY Land Trust.

Better Planning for Endangered Bat Protection

Micron must base their endangered bat protection plans off of literature pertaining to the species of bats at their NY site, not common bats from other locations. Specifically, Micron could look at the efficacy of destroying and relocating maternity roosts for endangered bats that return to the same site year after year.

Require Renewable Energy

Micron should build out renewable energy across CNY and NY to support their energy needs. They could commit to putting more solar on their main campus rooftops.

No PFAS in our Water

Micron must commit to using treatment and monitoring technology that assures that no PFAS are released into the Oneida River, Oswego River, Lake Ontario, and our drinking water.

Details on Human Health Risks

Micron must release information produced by independent scientists on the human health risks of working with these chemicals.

Evaluate Air Emissions from Incineration and Consider Alternatives

Micron must review the environmental impacts of incineration and consider the use of alternative technologies within the DEIS.

Monitor Local Air Emissions

Micron must be required to monitor the regional (not Rochester) levels of these pollutants during construction and operation.

Details and Justification for Environmental Justice Conclusions

Micron could provide more details on how their Environmental Justice outreach process was determined and justification for this process. Micron could provide more detail and justification for how they choose the study area for their Environmental Justice review.

Expand Radius for Evaluating Environmental Justice Impacts

Micron could increase the area they evaluate for Environmental Justice impacts to include downstream communities, the Town of Clay, Liverpool, and parts of Syracuse, as well as communities within 5 (not .5) miles of their rail spur, childcare center, and water treatment plant expansion, and around planned roadway changes. Overall, Micron could expand their study area given that this is one of the largest development projects in NYS history.

Evaluate Local Climate Justice Impacts

Micron could evaluate how their contributions to global warming will have adverse local effects, and evaluate how these effects impact environmental justice.

And lastly, if it is too much to ask that the following steps be taken then I request that Micron choose a different site. They could choose a site that was already impacted by legacy industrial development to construct their fabrication facilities, rather than this site which remains as wetland, grassland, and forest habitat and has not previously been developed. Many such sites exist not just in NYS but in the rust belt as well. It is my hope that the opportunity for economic development not come at the cost of our environment.

Thank you for your consideration. I hope you ensure that the CNY I know and love can continue to be my home and the ecologically diverse place I know and love.

Sincerely,

Amanda Boyle

Amanda Boyle

a.boyle95@gmail.com

1200 Clayton Manor Dr, Apt. 4

Liverpool, New York 13088

Archived: Thursday, August 14, 2025 10:22:37 AM

From: [Richard Buttny](#)

Mail received time: Sat, 9 Aug 2025 15:01:52

Sent: Saturday, August 9, 2025 11:01:52 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Based on my current understanding of the DEIS, I still want to highlight key environmental, & mitigation measures, which are insufficiently addressed in the DEIS.

Wetlands. Restored wetlands are rarely as effective or biodiverse as original wetlands, and can take many decades to develop. Micron should do a wetland replacement ratio of 10 or 15:1, compared to Micron's 2:1.

The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts. Ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.

Sincerely,

Richard Buttny

Richard Buttny
rbuttny@syr.edu
2298 Carson Rd
Cortland, New York 13045

Archived: Thursday, August 14, 2025 12:08:55 PM

From: [Tripti Bhattacharya](#)

Mail received time: Sun, 10 Aug 2025 16:31:53

Sent: Sunday, August 10, 2025 12:31:55 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Wetland Restoration and Water Quality in EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's new facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same.

My main concern centers on wetland plans in the DEIS - while the effort to restore nearby wetlands is laudable,

- **Water and Ecological Resources:** the DEIS does outline efforts to avoid wetland loss, as well as plans for restoration. However, I am curious as to why the 2:1 ratio of restored area to lost wetland area is used, rather than a higher ratio. It is well established that restored wetlands tend to be less biodiverse and fulfill fewer ecosystem functions than mature, well-established ecosystems. Given this, it might be necessary to restore a greater area (e.g. 10:1 ratio as used in other regional projects) of wetland to truly offset the losses from construction.
- **Contamination Issues:** We all know fluorinated and chlorinated compounds pose a major risk to human health. The DEIS outlines the fact that Micron may be considering alternatives to PFAS use in the manufacturing workstream. Can more details be provided about the process by which alternatives to PFAS, OR changes in the treatment protocol for PFAS, will be conducted by Micron in the future? What role will the OCDWEP play in this?

Thank you for your consideration of my comments.

Sincerely,

Tripti Bhattacharya

Tripti Bhattacharya

bhattacharya.tripti@gmail.com

455 Buckingham Ave

Syracuse, New York 13210-3315

Archived: Thursday, August 14, 2025 12:33:22 PM

From: [Chad Buske](#)

Mail received time: Sun, 10 Aug 2025 19:52:58

Sent: Sunday, August 10, 2025 3:52:58 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] Micron's Environmental Impact

Importance: Normal

Sensitivity: None

CHIPS Program Office CHIPs Program Office,

What is the projected environmental impact to our community?

Chad Buske

chadmbuske2@icloud.com

16 Endora Drive

Baldwinsville , New York 13027

Archived: Thursday, August 14, 2025 12:34:08 PM

From: [Lucinda Coffin](#)

Mail received time: Sun, 10 Aug 2025 19:57:53

Sent: Sunday, August 10, 2025 3:57:54 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] Environmental impact of Micron

Importance: Normal

Sensitivity: None

CHIPS Program Office CHIPs Program Office,

Just writing as I have wearing regarding the Micron plant and the environment.

What precautions are being taken around housing of new employees and the effects on the environment? How will this be tracked and dealt with as an ever evolving issue? That about third homes that are already there?

What about the use of electricity and the increased need for this facility. How does this impact citizens electric bills, who will address these ongoing concerns?

How will increased transportation needs and those effect on the environment be addressed? Who is involved in tracing this and how will it be tracked on going?

What is the implication on the company's /plants water use and as well as wetlands. How will this be monitored and dealt with as an ongoing basis?

Who is coordinating ongoing tracing and community engagement to ensure the prevention of the destruction of our natural resources in CNY?

Respectfully

Lucinda coffin.

Lucinda Coffin

lucinda.coffin@gmail.com

3487 McClary Rd

LA FAYETTE, New York 13084

Archived: Thursday, August 14, 2025 12:34:43 PM

From: [John Sheridan](#)

Mail received time: Sun, 10 Aug 2025 20:03:34

Sent: Sunday, August 10, 2025 4:03:35 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] Making Micron a responsible, good neighbor.

Importance: Normal

Sensitivity: None

CHIPS Program Office CHIPs Program Office,

I want to see Micron collaborate with affected towns and villages on issues of electricity, of water, of public transportation, of wetlands, of having a local workforce, of respecting workers' rights to organize, of air pollution and of guaranteed goals that have penalties, if not met.

John Sheridan

johnbsheridan@gmail.com

100 Lewann Drive

North Syracuse, New York 13212

Archived: Thursday, August 14, 2025 12:37:48 PM

From: [Katie Mulligan](#)

Mail received time: Mon, 11 Aug 2025 00:09:12

Sent: Sunday, August 10, 2025 8:09:13 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001; Focus on Wetlands

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
- **Greenhouse Gases:** The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar –and without relying on renewable energy credits or using renewable energy that is already on the grid – to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, it must be addressed how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents. It also must be assessed whether the average position at Micron will provide a livable wage for workers.

Additionally, the lack of consideration for some key wetlands issues within the DEIS must be addressed. Alongside the plan to drain around 200 acres of initial wetlands, there will most certainly be damage to neighboring ecosystems through dewatering and other processes and mitigation wetlands will be constructed nearby in the Oneida River region. However, the community of Clay has a history of flood concerns; how will wetlands outside this region mediate floodwater? The DEIS must address this issue further. The wetlands that traditionally hold excess water directly in the community will be gone, and that water will not have a place to be stored, likely causing further complications for the community. There is also a lack of clarity within the DEIS as to what type of mediation wetlands will be generated; the area chosen is previous agricultural land, and it will take tens if not hundreds of years to truly generate an ecosystem mirroring the biodiversity of the current habitat. There must be clarity as to the types of wetlands that will be constructed, plant life that will be included, and other specific details. A plan for a potential spill of materials from Micron must also be constructed further within the DEIS, in specific relation to mitigating any potential damage to the local water table and wetland environments.

The ratio of wetlands restored also must rise; to replace the biodiverse rich ecosystem that will be destroyed, a ratio of at least 7:1 in terms of wetlands replacement is incredibly important. The location chosen is a rich wetland that has taken hundreds of years to form; we must ensure the replacement even comes close to replacing the habitat and benefit these wetlands hold. The DEIS must also address monitoring and measures to check mitigation wetlands' health and productivity as they develop. The environments being previous agricultural environments, there must be further monitoring to ensure that they are progressing healthfully in development. The DEIS should also clarify that local housing or development in direct relation to Micron be incentivized or made to cultivate native plant life, and support ecosystems remaining. The current DEIS does not address several key issues completely necessary to even begin to mitigate the loss of the potentially rich wetlands currently at the proposed site.

Thank you for your consideration of my comments.

Sincerely,
Katie Mulligan
Resident of Central New York

Katie Mulligan
kermullig@gmail.com
500 Edgerton St
Minoa , NY 13116

Archived: Thursday, August 14, 2025 12:39:34 PM

From: [Donna Gataletto](#)

Mail received time: Mon, 11 Aug 2025 01:38:00

Sent: Sunday, August 10, 2025 9:38:00 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] Several Concerns

Importance: Normal

Sensitivity: None

CHIPS Program Office CHIPS Program Office,

I think it's great that Micron is coming to CNY. However I have several concerns:

-Excessive use of Electricity (bringing our residential costs up)

-Excessive need of water

-I don't think there's been clear messaging regarding how waste from the various plants will be handled-these run offs will be in our water, and air with potentially harmful implications
Industry can be a positive thing for an area; but handling the day to day needs have to be carefully planned out.

Thank you for your consideration to my concerns.

Donna Gataletto

deegmail@yahoo.com

110 Hallmore Dr

Camillus, New York 13031

Leifer, Jessica B.

From: Barbara Federman (bfliny@aol.com) Sent You a Personal Message
<bfliny@grsdelivery.com>
Sent: Sunday, August 10, 2025 8:04 PM
To: chipsnepa
Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Dear Members of the CPO and OCIDA,

Possibly destroying water sources. Taking away areas where we know animals live. Potential danger to people living near the area. All these must first be addressed before moving forward.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

I urge consideration and response to the following issues and concerns:

- Water and Ecological Resources: The Micron project is slated to destroy hundreds of acres of wetlands that provide habitat for species and provide natural flood mitigation. The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds. Ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
- Protection of Air, Water, and Workers: Microchip production requires numerous toxic chemicals, including PFAS "forever chemicals," but the DEIS does not provide sufficient detail on the types of chemicals that will be used or how continuous environmental monitoring and compliance will be enforced. The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the use of thousands of tons of hazardous chemicals in semiconductor production every year. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
- Greenhouse Gases: The DEIS does not state how Micron will meet its own 100% renewable energy

commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar, and without relying on renewable energy credits or using renewable energy that is already on the grid, to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

- Affordable and Abundant Water and Energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Barbara Federman
666 Interlaken Ln
North Babylon, NY 11703
bfliny@aol.com
(631) 363-2655

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

From: Hal Smith (hals205b@aol.com) Sent You a Personal Message
<hals205b@advocacymessages.com>
Sent: Monday, August 11, 2025 11:57 AM
To: chipsnepa
Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources:** The Micron project is slated to destroy hundreds of acres of wetlands that provide habitat for species and provide natural flood mitigation. The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds. Ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
- **Protection of Air, Water, and Workers:** Microchip production requires numerous toxic chemicals, including PFAS "forever chemicals," but the DEIS does not provide sufficient detail on the types of chemicals that will be used or how continuous environmental monitoring and compliance will be enforced. The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the use of thousands of tons of hazardous chemicals in semiconductor production every year. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
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New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

- Affordable and Abundant Water and Energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Hal Smith
205B Garrett Rd
Windsor, NY 13865
hals205b@aol.com
(607) 655-2490

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Wednesday, August 13, 2025 11:43:15 AM

From: [Mary Hamlin](#)

Mail received time: Mon, 11 Aug 2025 18:16:17

Sent: Monday, August 11, 2025 2:16:19 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] My Concerns about Micron in Clay NY

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Hello. I am very concerned about the impact of Micron on the area I have lived in for the last 58 years. I am concerned about greatly increased traffic and greatly increased housing, such as apartment buildings which will involve the destruction of much of the beautiful natural environment in Clay, NY.

Also, I do not believe that the 45-day public comment period gives the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
- **Greenhouse Gases:** The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar –and without relying on renewable energy credits or using renewable energy

that is already on the grid – to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,

Mary Hamlin

Mary Hamlin

mjohamlin@aol.com

8024 Henry Clay Blvd

Liverpool, New York 13090

From:**Mail received time:** Mon, 11 Aug 2025 18:40:48**Sent:** Sender: Sender; bh=/2yr4KguRIRQIU5R88ub98fjbtHrJ8g0tkWcVOHhvbQ=; b=fGSW27ycQPSIMhpyUrJqjcTEje1tHSD3TfW/HPT66SNTf+GTXmltK8Ob2VOceFpoVyl1IZa0TAs4V9wy2wKh8wQRBJXZbRW2k8PoRFIJXISnsjsy2jpexmNk9a/nWgucEhdHEpu9VWcpgbHOy8Ma80D/nY96JluMGKKQwjRDKuo=X**To:** [chipsnepa](#)**Subject:** [EXTERNAL] Micron Project Draft Environmental Impact Statement**Importance:** Normal**Sensitivity:** None**Archived:** Wednesday, August 13, 2025 11:43:42 AM

Dear Onondaga County Industrial Development Agency,

I am writing to express serious concerns about the Draft Environmental Impact Statement (DEIS) for the proposed Micron semiconductor facility. As one of the largest industrial developments in New York State's history, this project must be held to the highest standards of environmental responsibility and public health protection.

Micron must commit to phasing out the use of all PFAS chemicals and prioritizing safer, non-toxic alternatives wherever technically feasible. Numerous other companies in the semiconductor industry have already adopted effective substitutes to PFAS chemicals. The DEIS should ensure full transparency on the presence and use of PFAS at the manufacturing facility. The public has a right to know if toxic PFAS chemicals may be used and discharged into their environment.

Additionally, the destruction of over 200 acres of wetlands and thousands of feet of stream systems is unacceptable, particularly in a region as water-rich and ecologically sensitive as Central New York. Wetlands provide essential services like water purification, flood mitigation, and habitat for wildlife. The proposed 2:1 mitigation ratio does not come close to replacing these losses of high value wetlands. The DEIS should require a minimum 10:1 mitigation ratio and prioritize restoration efforts near the impacted areas to preserve watershed integrity.

Micron must also go much further in maximizing on-site renewable energy generation. The proposed 4 megawatts of solar energy is a fraction of what is needed to power a facility of this scale. All viable rooftop, parking, and adjacent land areas should be evaluated for solar deployment, and geothermal energy options should be fully explored. Finally, I urge Micron to avoid relying on speculative new or advanced nuclear development to meet its energy needs. New nuclear power is costly, unproven in this timeframe, and carries long-term environmental risks. Clean, proven renewable technologies like solar, wind, and geothermal are the right path forward for this project and for New York's climate goals.

Micron has the opportunity to be a leader in sustainable technology and corporate responsibility. I urge you to strengthen the final EIS to reflect meaningful action on limiting PFAS, pretreating wastewater for PFAS chemicals, protecting wetlands, and maximizing clean, local renewable energy solutions.

Sincerely,

Miss Lorrie Ann Feliciano

119 Pondfield Rd Unit 242 Bronxville, NY 10708-7612

lafactuslife@gmail.com

Archived: Wednesday, October 22, 2025 9:46:53 AM

From: [JOHN HAMLIN](#)

Mail received time: Mon, 11 Aug 2025 19:08:56

Sent: Monday, August 11, 2025 3:08:57 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Micron Project Community Impact and Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
- **Greenhouse Gases:** The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar –and without relying on renewable energy credits or using renewable energy that is already on the grid – to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

I am a resident of the Town of Clay in the County of Onondaga living on a portion of what was my Great Grandfather Albert Hamlin's tobacco farm. In my 74 years living on what is now known as Henry Clay Boulevard, I have witnessed the area in this part of the Town changing from largely rural and farms to include industrial and commercial development, together with expansion of suburban housing including single family residence tracts and apartment complexes. While the rural and farm environment is my preference, until recently, I felt there was a well balanced approach to planning and development. With the prospect of the Micron Project, the proposed development plans I viewed at the Clay Town Hall last year is of grave concern. Besides the obvious environmental impacts, the proposed emphasis on development of multi-family residences to support population growth to support the project development and operation is of grave concern. Traffic on Henry Clay Boulevard which is already difficult for those of us with homes between Wetzel Road and Route 31 is likely to increase to an intolerable level. It seems we are approaching a level of local development where farming and families preferring rural life will be a casualty of such development. In spite of my roots in the area, I fear the ongoing development will force me to dispose of my two remaining single family dwellings and perhaps discontinue my local business (currently employing 25-30) in the interest of progress.

Thank you for your consideration of my comments.

Sincerely,

John H. Hamlin

JOHN HAMLIN
JHHAMLIN@AOL.COM
8024 Henry Clay Blvd
Liverpool, New York 13090

Archived: Wednesday, August 13, 2025 11:49:35 AM

From: [Carol Chock](#)

Mail received time: Mon, 11 Aug 2025 19:49:37

Sent: Monday, August 11, 2025 3:49:38 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Ret. Hon. Chock CHIPS dEIS EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office CHIPs Program Office,

I retired from the County Legislature after 10 years of service of a County well-within the impact sphere around Syracuse. For many years I chaired the Tompkins County Planning and Economic Development Committee, and I was liaison to the County's Council of (all Tompkins County) Governments, where I chaired our Assessment and Land Valuation Subcommittee. There, we found the assumption,, previously accepted by Both business leaders and environmental advocates, that accepting risk of some harm to air and water quality meant that we'd come out ahead in our town, city, school and county budgets, turned out in our studies to be untrue 95% of the time when we examined a wide range of regional cases.

In another 5-10% of locations, the public sector might eventually break even, but with a lag time of at least 2 years, more often the lag time was 3-5 years. That was because the outlay of public expenditures at all levels to support the roads, bridges, social services, schools, even our administrative staff to handle the influx in many spheres of life (including the permits and processing of applications for secondary-level economic activity—more restaurants, bars, dry cleaners, day care centers, etc. You Name It), had to be laid out while the development is being built, prior to the receipt of sales tax, property tax, and any state/federal support that vines back to us following payment of business and personal income tax, as wellss as corporate or business taxes. Depending on where they fall in the actual cycle, properties get assessed in the year after they've been put into service, then your city, town, County, and school budgets are passed so it's another year before we receive the income. Then Add another year or two for billing, tax or production fee assessments from NYS and federal bodies and then their receipt of the taxes/fees owed, the setting of those budgets, and then the award and processing of payments to our local government offices.

When climate considerations are taken into account, the public sector will be the ones left with the obligation to repair the damage— public health costs, expensive repair of roads and other infrastructure after ever-strengthening storms, in our case we have faced the need to house an increasing number of residents who lose their homes in our 100-year flood plain that now floods every few years or maybe every decade. We were facing a larger potential loss then any of us went into the study expecting to find.

Since my retirement from the Tompkins County Legislature, I have been President of Ratepayer and Community Intervenors, where I m just starting as an official participant in my fifth NYSEG—RG&E Utility Rate Case. I'm quite familiar with the energy implications of the

Micron project. The energy requirements of this project will drive up prices for all of our residential, small business, institutional, and established larger businesses. Residential customers (ratepayers), are facing NYSEG's requested 33% increase in our gas delivery rate and 23.7% requested increase in our electric delivery rate, BEFORE this project is added to the grid. And the electric request doesn't make any significant dent to provide the extra electricity that will be retired once it is up and running.

Our region must be able to find and provide incentives to truly Clean Energy activities. You would be true leaders for the future if you fund this EIS to be inadequate and seek out some of the many many effective clean energy businesses ready to ramp up as soon as there is public support. Public support of a similar magnitude to what is being offered to Micron but directed towards renewable energy activities would make our region a true leader instead of accepting the role of host to dirty energy activities.

For those reasons, I fully support all the comments below on hazards to the environment.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

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that is already on the grid – to meet New York State’s climate change objectives and the requirements of the New York Green CHIPS Act.

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Thank you for your consideration of my comments.

Sincerely,

Carol I. Chock,

Retired Tompkins County Legislator District Three

President, Ratepayer and Community Intervenors of the Finger Lakes

Grandparent to Nine (!) children

Carol Chock

carolchock@gmail.com

39 Woodcrest Avenue

Ithaca, New York 14850

From: Doug Couchon <noreply@adv.actionnetwork.org>
Sent: Wednesday, August 6, 2025 5:28 PM
To: chipsnepa
Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

CHIPS Program Office CHIPs Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

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Thank you for your consideration of my comments.

Sincerely,

Doug Couchon

dcouchon@yahoo.com

109 Foster Avenue

Elmira, New York 14905

From: Andrew Hartley <noreply@adv.actionnetwork.org>
Sent: Wednesday, August 6, 2025 7:33 PM
To: chipsnepa
Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

CHIPS Program Office CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. However, I feel the 45-day comment period is insufficient for the public to even scan the assessment, which is several thousands of pages long. Please extend the period to late October, or even later.

Also, I am informed a petition, signed by hundreds of residents around Clay, has not been responded to. DEC has a responsibility to address these residents' concerns, before approving any part of the facility construction.

Please respond also to the following matters:

How will Micron manage & control the potential air, water & soil contamination associated with manufacturing semiconductors?

Micron has committed to relying 100% on renewable energy, which is good, but what happens if it doesn't meet this goal? Energy needs of producing semiconductors are massive.

Thank you for your consideration of my comments.

Sincerely, Andrew M Hartley

Andrew Hartley
khahstats@yahoo.com
215 Hilltop Dr
Elma, New York 14059

From: Meghan Yeomans <noreply@adv.actionnetwork.org>
Sent: Wednesday, August 6, 2025 7:39 PM
To: chipsnepa
Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

CHIPS Program Office
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Thank you for your consideration of my comments.

Sincerely,
Meghan yeomans

Meghan Yeomans
meghan.yeomans@gmail.com
108 hatherly road
Syracuse , New York 13224

From: Timothy Ray <noreply@adv.actionnetwork.org>
Sent: Wednesday, August 6, 2025 7:41 PM
To: chipsnepa
Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

CHIPS Program Office CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Timothy Ray

Timster211@gmail.com

108 Hatherly Rd

Syracuse, New York 13324

From: Madeline Bohl <noreply@adv.actionnetwork.org>
Sent: Wednesday, August 6, 2025 7:44 PM
To: chipsnepa
Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

CHIPS Program Office CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York.

Please extend the public comment period to 10/25/25 so more people can read, understand, and engage with the report in a meaningful way.

I want to share what's most important to me as a New Yorker, and that is continued health of our people, workers, and environment.

I don't believe that the DEIS properly addresses the dangers to the health of the public and to our ecosystems that this project would entail.

Our watersheds are our future and our lifeways! The DEIS must address the ways this project would impact our wetlands and watersheds, and must provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project.

A much more deep and holistic analysis is required to properly assess the way this project impacts our water and other ecological features.

I'm also concerned that the plan so far does not explain how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions, or how Micron will comply with New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

The DEIS also does not state how Micron plans to make sure that the people involved are protected- whether that be the workers and how they'll be protected from the chemicals involved in semiconductor production, or how they will handle the toxic chemicals involved for proper disposal.

Not only the workers who come to work at the plant, but also the community that already exists in the area of the proposed project must be considered. How will this affect traffic and housing? We need a comprehensive plan for this.

And lastly, as we continue to see increasing utility rates- I want to know that the usage of water and electricity by micron will not affect taxpayer rates, as has been happening at other data centers and large plants around the country.

Please address each of these issues that hugely impacts our central New York community!

Thank you for your consideration of my comments.

Sincerely,
Madeline

Madeline Bohl
spikyhairedmerganser@duck.com
43 greenleaf ct
Rochester, New York 14623

From: Rutherford Charlot <noreply@adv.actionnetwork.org>
Sent: Wednesday, August 6, 2025 8:06 PM
To: chipsnepa
Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Rutherford Charlot

chopcop9009@yahoo.com

109-14 Farmers Blvd., Apt. 2

Saint Albans, New York 11412

From: zpstrass@bu.edu <noreply@adv.actionnetwork.org>
Sent: Wednesday, August 6, 2025 9:41 PM
To: chipsnepa
Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

CHIPS Program Office CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
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Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

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Thank you for your consideration of my comments.

Sincerely,

zpstrass@bu.edu

PO BOX 1429

Water Mill, New York 11976

From: Ashley Jansson <noreply@adv.actionnetwork.org>
Sent: Wednesday, August 6, 2025 10:49 PM
To: chipsnepa
Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

CHIPS Program Office CHIPs Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Ashley Jansson

Ashley Jansson

azashley88@yahoo.com

112 Heather Ln

CAMILLUS, New York 13031

Archived: Thursday, October 9, 2025 12:12:17 PM

From: [Marie Zingaro](#)

Mail received time: Thu, 7 Aug 2025 11:26:03

Sent: Thursday, August 7, 2025 7:26:05 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Marie Zingaro
marie.zingaro@yahoo.com
8382 Boyko farm
Cicero, New York 13039

Archived: Thursday, October 9, 2025 12:19:46 PM

From: [Qiana Williams](#)

Mail received time: Thu, 7 Aug 2025 11:51:51

Sent: Thursday, August 7, 2025 7:51:52 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Qiana Williams
qianaki@gmail.com
260 Roosevelt Ave
Syracuse, New York 13210

Archived: Thursday, October 9, 2025 12:28:51 PM

From: [JoAnn Cooke](#)

Mail received time: Thu, 7 Aug 2025 12:20:17

Sent: Thursday, August 7, 2025 8:20:18 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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You have the opportunity to do this right.

Thank you for your consideration of my comments.

Sincerely,
JoAnn Cooke

JoAnn Cooke
joanncooke1124@gmail.com
510 Scott Ave
Syracuse, 12324

Archived: Thursday, October 9, 2025 12:36:16 PM

From: [Lisa Hart](#)

Mail received time: Thu, 7 Aug 2025 12:38:17

Sent: Thursday, August 7, 2025 8:38:18 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Lisa Hart

lhart106@verizon.net

169 Edgehill Road

Sytacuse, New York 13224

Archived: Thursday, October 9, 2025 12:40:48 PM

From: [Sara Gronim](#)

Mail received time: Thu, 7 Aug 2025 14:27:27

Sent: Thursday, August 7, 2025 10:27:28 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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However, based on my current understanding of the DEIS, I still want to offer the following comment.

It is not clear to me that Micron is fully aware of the obligations it is incurring under our Climate Leadership and Community Protection Act. To say that it is committed to 100% renewable energy is merely rhetorical if it doesn't have a plan. In pictures of the proposed facility I see vast expanses of flat roofs with nary a solar panel in sight. Are there BESS facilities planned? How about a thermal energy network? As NYISO's recent "Power Trends 2025" report points out, huge projects like this will require far more electricity than NYS currently produces from all sources, not just renewables. If Micron expects to get its renewable energy from existing sources--well, that simply means that the rest of us will need to get it from fossil fuel plants unless we build enough renewables to supply Micron, too. (And on whose dime?) Nor are renewable energy credits a valid substitute. Claiming you planted some trees somewhere else does not get NYS closer to meeting its CLCPA targets. No bookkeeping sleight-of-hand is going to halt the acceleration of global heating.

Micron needs to actually live up to the mandates of the CLCPA if it wants a home in New York State.

Thank you for your consideration of my comments.

Sincerely,

Sara Gronim

sgronim@rcn.com

35 PROSPECT PARK WEST

BROOKLYN, New York 11215

Archived: Thursday, October 9, 2025 1:01:37 PM

From: [Sunita Prasad](#)

Mail received time: Thu, 7 Aug 2025 15:47:25

Sent: Thursday, August 7, 2025 11:47:26 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Sunita Prasad
sunitadee@gmail.com
114 Robbins Lane
DeWitt, New York 13214

Archived: Thursday, October 9, 2025 1:04:13 PM

From: [Syd Kellogg](#)

Mail received time: Thu, 7 Aug 2025 17:30:16

Sent: Thursday, August 7, 2025 1:30:17 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,
Syd

Syd Kellogg
sydthekid521@gmail.com
5379 Mud Mill Rd
Brewerton, New York 13029

Archived: Thursday, October 9, 2025 1:17:08 PM

From: [DAVID CASELAS](#)

Mail received time: Thu, 7 Aug 2025 18:45:35

Sent: Thursday, August 7, 2025 2:45:36 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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CHIPS Program Office,

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Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

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Thank you for your consideration of my comments.

Sincerely,

DAVID CASELAS

david@agreeny.org

GEDEES ST.

SYRACUSE, New York 13204

Archived: Thursday, October 9, 2025 1:18:07 PM

From: [Elizabeth Bridges](#)

Mail received time: Thu, 7 Aug 2025 18:54:52

Sent: Thursday, August 7, 2025 2:54:53 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

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Thank you for your consideration of my comments.

Sincerely,

Elizabeth Bridges

hwjh_37@yahoo.com

8458 Fathom Dr

Baldwinsville , New York 13027

Archived: Thursday, October 9, 2025 1:19:04 PM

From: [Renee Barry](#)

Mail received time: Thu, 7 Aug 2025 19:09:49

Sent: Thursday, August 7, 2025 3:09:49 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,
Renee

Renee Barry
renee.marie.barry@gmail.com
403 s Lowell ave
syracuse, New York 13204

Archived: Thursday, October 9, 2025 1:21:58 PM

From: [Mario Zaja](#)

Mail received time: Thu, 7 Aug 2025 19:15:50

Sent: Thursday, August 7, 2025 3:15:51 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to provide my questions and comments.

I'm trying to understand how this company can be forced onto our community?

How can the government ignore our concerns and choice to now allow this company into our community?

Certainly there are environmental concerns.

However, my concern goes beyond that, and it goes to the adverse economic impact that this company will have in our community.

I do understand that there will be a select group of people who stand to gain from this company moving into our community. However, the great majority of us will not only not gain, we are going to suffer substantially in multiple ways.

First of all, our young people cannot afford to buy homes anymore.

The traffic on our roads is now unbearable. Which is not only a hindrance and inconvenience to our lives, it's also a significant safety concern. Because the people moving here do not respect our traffic etiquette.

The additional expenditure of funds on infrastructure that has nothing to do with our community and solely has to do with this company is completely fiscally irresponsible.

The huge influx of people from communities that do not share our values are destroying our social status quo. And we have no way of predicting what type of people this influx will attract. This is placing our community and our families in danger.

I do not believe that spending more money on police will help this. If anything, it's going to hurt us more. Because it's taking money away from our health and education. And this company will not help any of that. Neither will the people moving here. They will just take from us.

As a military veteran, I believe that I should have a voice. I served our country and our community. Why should a politician have a greater voice than me?

Please reject this company's proposal and request that they move elsewhere.

Very respectfully

Mario Zaja

Mario Zaja

dalmaticum@gmail.com

4804 Norstar Blvd, 204

Liverpool, New York 13088

Archived: Thursday, October 9, 2025 1:23:11 PM

From: [Leah Kraus](#)

Mail received time: Thu, 7 Aug 2025 19:50:39

Sent: Thursday, August 7, 2025 3:50:40 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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I urge consideration and response to the following issues and concerns:

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Thank you for your consideration of my comments.

Sincerely,

Leah Kraus
Dewitt, NY

Leah Kraus
leah.m.kraus@gmail.com
244 Marsh Dr
Syracus, New York 13214

Archived: Thursday, October 9, 2025 1:24:10 PM

From: [Brynn Schmitt](#)

Mail received time: Thu, 7 Aug 2025 20:41:04

Sent: Thursday, August 7, 2025 4:41:05 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York.

In this time of climate crisis, the most important consideration in all decision making needs to be: preserving the natural systems and communities that provide our human communities with the water, air and soil we need to survive. Please keep this big picture foremost in your minds.

Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

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Thank you for your consideration of my comments.

Sincerely,

Brynn Schmitt
brynnschmitt@yahoo.com
134 Hornbrook Road
Ithaca, New York 14850

Archived: Thursday, October 9, 2025 1:52:28 PM

From: [Eileen Quimby](#)

Mail received time: Thu, 7 Aug 2025 21:07:30

Sent: Thursday, August 7, 2025 5:07:31 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

I am concerned with the impacts on our environment and upcoming global changes from the uprising proposals of putting in micron. The impacts (which I was unaware prior to reading a report) that it will have in NYS. The wetlands, flooding potentials, endangering natural habitats and wildlife, chemicals from spills and emissions into our air and waterways, and endangering our own health.

The cleanup strategies that micron says it can do is vague and not so transparent. I thought it was going to be good pay for all hired, but now I see, they take great care of higher ups and management but then it really just pays a lot less to the under dog.

I'm not as much excited to having it to come to central NY as I was in the beginning.

Thank you for your consideration of my comments.

Sincerely,
Eileen Quimby

Eileen Quimby
Johnstoe62@gmail.com
3752 Warners Road
Syracuse, New York 13209

Archived: Thursday, October 9, 2025 2:05:10 PM

From: johnrusso8@hotmail.com

Mail received time: Thu, 7 Aug 2025 22:00:38

Sent: Thursday, August 7, 2025 6:00:39 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

johnrusso8@hotmail.com
8822 Henry Clay Blvd
Clay, 1304

Archived: Thursday, October 9, 2025 2:13:52 PM

From: [Kanischa Miller](#)

Mail received time: Fri, 8 Aug 2025 00:00:40

Sent: Thursday, August 7, 2025 8:00:41 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Kanischa Miller
KanischaMiller@gmail.com
211 Carlton drive
North Syracuse , New York 13212

Archived: Thursday, October 9, 2025 2:28:55 PM

From: [Annette Farley](#)

Mail received time: Fri, 8 Aug 2025 00:02:35

Sent: Thursday, August 7, 2025 8:02:36 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

I am grateful there is still time to comment on this Draft version of this Environmental Impact Statement that evaluates how the construction and operation of the Micron facility will effect me, my neighbors, and my community in the next 16 in upcoming years, and beyond that, to the other living things that are affected and may be destroyed as though humans were the only species that mattered here.

Yes, I am concerned that there is a long creep toward making the habitats for creatures that must live in wetlands confined to ever decreasing space, that with every concession made yielding to the desires of humans, this may become too much. We are losing many species everyday. It is my understanding from experts like Catherine Landis that birds and the mosquito-eating Northern long-eared bats may not find sanctuary in a new site to which they are not acclimated. This really concerns me.

Thank you for your consideration of my comments.

Sincerely,

Annette Farley

Annette Farley

humminga51@yahoo.com

501 Yale Avenue

Syracuse, New York 13219

Archived: Thursday, October 9, 2025 2:39:56 PM

From: neville10@gmail.com

Mail received time: Fri, 8 Aug 2025 00:27:06

Sent: Thursday, August 7, 2025 8:27:07 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. I am submitting a comment and also ask you to please consider that the 45-day public comment period does not give the majority of the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum. It is notable that there has been no public response to a petition signed by over 1500 residents of the region asking for the same extension. Based on my current understanding of the DEIS, I want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

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Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,
Lisa Neville

lneville10@gmail.com
132 Kensington Place
Syracuse, New York 13210

Archived: Thursday, October 9, 2025 2:50:25 PM

From: [Annette Farley](#)

Mail received time: Fri, 8 Aug 2025 00:40:58

Sent: Thursday, August 7, 2025 8:41:00 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office CHIPS Program Office,

I am grateful there is still time to comment on this Draft version of this Environmental Impact Statement that evaluates how the construction and operation of the Micron facility will effect me, my neighbors, and my community in the next 16 in upcoming years.

I am particularly concerned, knowing that PFAS are part of the manufacturing process that Micron apparently needs to make semi-conductors. I am glad to see that two whole buildings will be dedicated to the processing of this and other toxic waste.

However, I would be far less concerned if there were put into place a ongoing body which citizens can access the ongoing developments in handling this waste, especially with regard to release into the air and water of this, OUR HOME. Those of us who don't drink water from Skaneateles Lake, drink it out of Lake Ontario.

It is encouraging that Onondaga County has the means to expand the treatment plant that will handle the wastewater coming from Micron. But I am concerned that if that facility is inadequate, or mismanaged, us locals will be held responsible as Micron side-steps problems that may well arise.

Thank you for your consideration of my comments.

Sincerely,
Annette Farley

Annette Farley
humminga51@yahoo.com
501 Yale Avenue
Syracuse, New York 13219

Archived: Thursday, October 9, 2025 2:58:47 PM

From: [Wendy Ryden](#)

Mail received time: Fri, 8 Aug 2025 01:31:49

Sent: Thursday, August 7, 2025 9:31:49 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
- **Greenhouse Gases:** The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar –and without relying on renewable energy credits or using renewable energy that is already on the grid – to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,

Wendy Ryden
wendy.ryden@liu.edu
40 irving place
oyster bay, New York 11771

Archived: Thursday, October 9, 2025 3:03:00 PM

From: [Lisa Saka](#)

Mail received time: Fri, 8 Aug 2025 02:22:06

Sent: Thursday, August 7, 2025 10:22:08 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Lisa Saka
lisacsaka@gmail.com
207 Ross Park
Syracuse, New York 13208

From: Michaela Frank <noreply@adv.actionnetwork.org>
Sent: Friday, August 8, 2025 9:06 AM
To: chipsnepa
Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

CHIPS Program Office CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

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Thank you for your consideration of my comments.

Sincerely,
Michaela Frank

Michaela Frank
frank2416m@gmail.com
55 Seymour Street
Auburn, New York 13021

From: Brandy Colebrook <noreply@adv.actionnetwork.org>
Sent: Friday, August 8, 2025 9:27 AM
To: chipsnepa
Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

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Farmland Loss. Hundreds of acres of farmland will be lost. Farmland is essential to feeding the Syracuse area and with the influx of more people moving to the area this will mean that more food will be necessary. Local farms play a vital economic role in the region. More investment should be made to ensure more farmland is protected in the Central New York Area.

- Protection of Air, Water, and Workers. The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.

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Thank you for your consideration of my comments.

Sincerely,

Brandy Colebrook

Brandy Colebrook
bcolebrook@nyalt.com
712 Stinard Ave
Syracuse, New York 13207

Archived: Thursday, October 9, 2025 3:51:12 PM

From: johnbsheridan@gmail.com

Mail received time: Fri, 8 Aug 2025 13:28:20

Sent: Friday, August 8, 2025 9:28:20 AM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

My chief concerns are a robust public transportation system, water, an intentional community effort to support the diversity of new residents and transparent accountability.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

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wind and solar –and without relying on renewable energy credits or using renewable energy that is already on the grid – to meet New York State’s climate change objectives and the requirements of the New York Green CHIPS Act.

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Thank you for your consideration of my comments.

Sincerely,

johnbsheridan@gmail.com
100 Lewann Drive
North Syracuse, New York 13212

Archived: Thursday, October 9, 2025 3:16:55 PM

From: [LESLIE MONOSTORY](#)

Mail received time: Fri, 8 Aug 2025 14:43:46

Sent: Friday, August 8, 2025 10:43:46 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

IZAAK WALTON PFAS RESOLUTION 2023

In a resolution adopted by the Izaak Walton League of America in 2023, the IWLA noted that PFAS is a general classification of chemicals that contaminate the waters and lands across our country and threaten the health of people, communities, and wildlife.

They have an ability due to their nature to persist and continue their impacts to environment and health of people and wildlife in their presence in water supplies and in the food web and beyond. Exposures in drinking water and foods need to be addressed quickly.

The Izaak Walton League of America supports establishments of mandatory standards for drinking water and groundwater. Since discharges from the Micron chip manufacturing process will be entering Lake Ontario, a source of drinking water for communities in both the U.S. and Canada, Micron needs to verify that their treatment methods for limiting PFAS discharges will meet drinking water standards developed for both countries.

ESTABLISHMENT OF A MICRON COMMUNITY PARTNERSHIP

The Micron Project for Onondaga County has the potential to generate significant economic benefits for our community, and will also demand upgrades and use of our community resources in order to meet Micron's upcoming production goals. This project will require coordinated input and support from both our local community and from the involved federal, state, county and municipal entities involved.

Over the past several decades, a coalition of agencies have worked together with a local industry, Honeywell International, Inc., to undertake the reclamation of formerly polluted Onondaga Lake. The overall cost of this reclamation project, involving both sewage treatment improvements and mitigation of industrial contaminants, totaled over one billion dollars.

A major element leading to the successful restoration of Onondaga Lake was the establishment of an Onondaga Lake Partnership that allowed local community groups and the public to share information about the progress made during the lake reclamation by participating federal, state and county agencies.

Given the significant scale and enormity of the upcoming Micron Project, whose construction may extend over one to two decades, it is the recommendation of our Izaak Walton Central New York Chapter that Micron provide funds for establishment of a Micron Community Partnership,

similar to the former Onondaga Lake Partnership, in order to maintain public communications and outreach between the involved government agencies, Micron officials, and our local community.

We believe that establishment of such a Micron Community Partnership will benefit both Micron's Project development and its interactions with our community members in Onondaga County and Central New York.

Thank you for your consideration of our comments.

Sincerely,

Les Monostory, V.P.
Central New York Chapter
Izaak Walton League of America

LESLIE MONOSTORY
fishbugm5@twcny.rr.com
125 Euclid Dr
Fayetteville, New York 13066-1919

Archived: Thursday, October 9, 2025 3:12:34 PM

From: [Linda Miller](#)

Mail received time: Fri, 8 Aug 2025 15:19:45

Sent: Friday, August 8, 2025 11:19:45 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same.

Please consider and respond to the following issues and concerns:

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- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production.
- **Greenhouse Gases:** The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse emissions.

Affordable and abundant water and energy: The DEIS does not address. Micron's massive energy and water use. This will affect the affordability of energy and clean water and likely require more tax dollars and higher rates or tax paid by the public to offset the cost of infrastructure upgrades and higher energy demands as a result of this project.

- The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to

workforce development, training, jobs, and career advancement at Micron specifically for production workers.

Thank you for your consideration of my comments.

Sincerely,

Linda Miller
lmemiller@yahoo.com
96 Trap Lane
Columbia Falls, Montana 59912

Archived: Thursday, October 9, 2025 3:33:14 PM

From: [Dale Otto](#)

Mail received time: Fri, 8 Aug 2025 15:44:46

Sent: Friday, August 8, 2025 11:44:47 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
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Thank you for your consideration of my comments.

Sincerely, Dale Otto

Dale Otto
ottoonematic@gmail.com
309 Donlin Drive
Liverpool, NY, New York 13088

From: Syd Kellogg <noreply@adv.actionnetwork.org>
Sent: Friday, August 8, 2025 1:28 PM
To: chipsnepa
Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

CHIPS Program Office
CHIPS Program Office,

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- Greenhouse Gases: The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar –and without relying on renewable energy credits or using renewable energy that is already on the grid – to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,

Syd Kellogg

sydthekid521@gmail.com

5379 Mud Mill Rd

Brewerton, New York 13029

Archived: Thursday, October 9, 2025 3:24:12 PM

From: [Miranda Nelson](#)

Mail received time: Fri, 8 Aug 2025 17:29:39

Sent: Friday, August 8, 2025 1:29:40 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
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Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

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Thank you for your consideration of my comments.

Sincerely,

Miranda Nelson
mirandabnelson@gmail.com
458 Kosciuszko St
Brooklyn, New York 11221

From: Leslie Lawrence <noreply@adv.actionnetwork.org>
Sent: Friday, August 8, 2025 1:43 PM
To: chipsnepa
Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York.

Micron will eventually clear 1,000 acres of trees and brush. Micron will cut more than 400 acres of forest. The chart in the DEIS report found there are 30+ kinds of native trees and 6 kinds of native shrubs. My belief is that it would be disrespectful to kill living "senior" native trees without ensuring new planting. As you know trees and to a lesser extent, shrubs have a vital role in protecting us from extreme heat as they absorb and store carbon. We want the jobs and economic growth that Micron promises but if we destroy forests without a solid plan for replanting and replacing them we'll be contributing to earth burn and the eventual suffering of workers. What plan does Micron and Onondaga County have to plant and make up for the lost shrubs and trees?

Thank you for your consideration of my comments.

Sincerely,
Leslie Lawrence

Leslie Lawrence
lelaw1963@gmail.com
102 Stoneridge Dr.
Syracuse, New York 13214

From: George Lawrence <noreply@adv.actionnetwork.org>
Sent: Friday, August 8, 2025 1:51 PM
To: chipsnepa
Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

CHIPS Program Office CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York.

The wetland restoration sites are scattered and small compared to what will be destroyed. Though their combined area will be twice the size because each one is at a distance and smaller in area they will not store the amount of carbon or make up for the lost wetland. Wetland replacement projects that are succeeding have been 10 to 15 times larger. Micron and the County need to commit to establishing much more wetland. Restored wetlands will take 50-100 years to function as effectively as the lost wetland. In what ways and for how long will the County and Micron monitor the restored wetland areas to ensure that they are developing, that biodiverse plants and animals are becoming established and thriving?

Thank you for your consideration of my comments.

Sincerely,
George Lawrence

George Lawrence
lelaw@twcny.rr.com
102 Stoneridge Dr.
Syracuse, New York 13214-1941

Archived: Thursday, August 14, 2025 2:42:03 PM

From: [Leslie Lawrence](#)

Mail received time: Fri, 8 Aug 2025 17:54:15

Sent: Friday, August 8, 2025 1:54:16 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York.

I have some questions about birds that will be losing homes and feeding grounds. When building starts how will grassland birds be encouraged to move to new, safe habitats? Are birds that are forced off their territory fed in areas where it is hoped they will nest? Will the Micron buildings have bird friendly glass which would lower the number bird strikes? Also will Micron minimize exterior lights at night and when lights are necessary install only shielded, downward-directed fixtures or whatever is best to minimize risks to birds flying at night?

Thank you for your consideration of my comments.

Sincerely,

Leslie Lawrence

Leslie Lawrence

lelaw1963@gmail.com

102 Stoneridge Dr.

Syracuse, New York 13214

Archived: Thursday, August 14, 2025 2:42:08 PM

From: [George Lawrence](#)

Mail received time: Fri, 8 Aug 2025 17:58:37

Sent: Friday, August 8, 2025 1:58:38 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York.

I am a Syracuse resident and I would love to think that Micron is going to help the city, that there are going to be jobs for the many who deserve/need them. I would love to think housing issues will improve. But if I was hired by Micron and was looking for housing I would go straight down Route 31 to Madison County or straight up Route 81 to Oswego County. Both have easy access, less congestion and possibly lower taxes. So what is Onondaga County doing to encourage people to settle here rather than in nearby counties?

Thank you for your consideration of my comments.

Sincerely,
George Lawrence

George Lawrence
lelaw@twcny.rr.com
102 Stoneridge Dr.
Syracuse, New York 13214-1941

Archived: Thursday, August 14, 2025 2:42:13 PM

From: [Leslie Lawrence](#)

Mail received time: Fri, 8 Aug 2025 18:08:49

Sent: Friday, August 8, 2025 2:08:50 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office CHIPS Program Office,

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Micron will eventually clear 1,000 acres of trees and brush. Micron will cut more than 400 acres of forest. The chart in the DEIS report found there are 30+ kinds of native trees and 6 kinds of native shrubs. My belief is that it would be disrespectful to kill living "senior" native trees without ensuring new planting. As you know trees and to a lesser extent, shrubs have a vital role in protecting us from extreme heat as they absorb and store carbon. We want the jobs and economic growth that Micron promises but if we destroy forests without a solid plan for replanting and replacing them we'll be contributing to earth burn and the eventual suffering of workers. What plan does Micron and Onondaga County have to plant and make up for the lost shrubs and trees?

Thank you for your consideration of my comments.

Sincerely,

Leslie Lawrence

Leslie Lawrence

lelaw1963@gmail.com

102 Stoneridge Dr.

Syracuse, New York 13214

Archived: Thursday, August 14, 2025 2:42:17 PM

From: [Jill and Richard Robinson](#)

Mail received time: Fri, 8 Aug 2025 19:48:42

Sent: Friday, August 8, 2025 3:48:43 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

In 1983, we moved to Grange Road in Clay because of the rural nature. We are on a well. We hope that Micron will prove to be a good neighbor.

Following are our concerns for this project:

Extend the public comment period to 120 days

PROVIDE DETAILED PLANS TO PROTECT THE WATER SOURCES FOR THOSE OF US ON WELLS

Guarantee of continuation of present water quality

Transparency and specificity in project details:

Chemicals used

Specific Sources of fill

Managing Traffic issues

Specific plans for solid waste disposal

Specific plans for disposal of used chemicals

Specific plans for wetlands water displacement

Specific plans for plans for retention ponds

Specific plans for Construction dust control

County's plans for when chips become obsolete

Create a local oversight committee comprised of community members with knowledge of pertinent issues

Micron needs to do much better wetland mitigation or work around existing wetlands as they are presently configured

Provide for public hearings with questions and answers after completion of each FAB

Micron should be financial responsible for adverse effects

Will Micron reimburse Onondaga County for expenses incurred (procurement, etc.) if none or only two FABS are built

When is Ryan McMahon moving onto Caughdenoy Road to enjoy the construction experience with us?

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

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there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,

Jill and Richard Robinson
jillr1017@gmail.com
4690 Grange Road
Clay, New York 13041

Archived: Thursday, August 14, 2025 2:42:22 PM

From: [Conor Healy](#)

Mail received time: Fri, 8 Aug 2025 19:57:41

Sent: Friday, August 8, 2025 3:57:43 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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I urge consideration and response to the following issues and concerns:

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Thank you for your consideration of my comments.

Sincerely,

Conor Healy
conor.patrick.healy@gmail.com
378 Oakdale Drive
Rochester, New York 14618

Archived: Thursday, October 9, 2025 3:39:00 PM

From: [Sam Stoeltje](#)

Mail received time: Fri, 8 Aug 2025 20:51:08

Sent: Friday, August 8, 2025 4:51:09 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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I urge consideration and response to the following issues and concerns:

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Thank you for your consideration of my comments.

Sincerely,
Dr. Sam Stoeltje

Sam Stoeltje
sfstoeltje@gmail.com
749 Allen St
Syracuse, NY

Archived: Thursday, August 14, 2025 2:42:33 PM

From: [Christalle Twomey](#)

Mail received time: Fri, 8 Aug 2025 20:51:14

Sent: Friday, August 8, 2025 4:51:16 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

As a very concerned citizen of Onondaga County, I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
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This is an extremely serious matter, and I thank you for your consideration of my comments.

Sincerely,

Christalle Twomey
christalletwomey@gmail.com
205 Cleveland Blvd
Fayetteville, New York 13066

Archived: Thursday, August 14, 2025 2:42:38 PM

From: [Renee Hagar-Smith](#)

Mail received time: Fri, 8 Aug 2025 21:17:57

Sent: Friday, August 8, 2025 5:17:57 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

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Thank you for your consideration of my comments.

Sincerely,

Renee Hagar-Smith

Renee Hagar-Smith
reneehagarsmith@gmail.com
304 Sherbrooke Rd
Manlius, New York 13104

Archived: Thursday, August 14, 2025 2:38:26 PM

From: [A.L. Steiner](#)

Mail received time: Fri, 8 Aug 2025 21:22:36

Sent: Friday, August 8, 2025 5:22:37 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
- **Greenhouse Gases:** The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar –and without relying on renewable energy credits or using renewable energy that is already on the grid – to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,

A.L. Steiner
asteinerny@gmail.com
1299 Cornwallville RD.
Cornwallville, New York 12418

Archived: Thursday, August 14, 2025 2:38:31 PM

From: [David Friedman](#)

Mail received time: Fri, 8 Aug 2025 21:48:40

Sent: Friday, August 8, 2025 5:48:41 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHiPs Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York.

I urge consideration and response to the following issues and concerns:

Both before and after full build-out Micron will require tremendous amounts of energy to operate its facilities. While I understand that the Clay substation will be expanded to meet some of Micron's demands for electricity, where will the rest of its electricity come from? Just as important, how much of this electricity will come from renewable sources? Micron has only said that it will purchase Renewable Energy Credits; but these are already being used to supply power to other customers. In short, Micron has no solid plan to purchase the rest of the electricity it will need, renewable or otherwise. If it competes with other businesses and residential customers for energy it is more than likely rate payers will see increases in their bills - something we can ill afford.

Sincerely,

David Friedman
Fayetteville, NY

David Friedman
duvbab@aol.com
100 Margo Lane
Fayetteville, New York 13066-1529

Archived: Thursday, August 14, 2025 2:38:36 PM

From: [MELLENY HALE](#)

Mail received time: Sat, 9 Aug 2025 02:08:07

Sent: Friday, August 8, 2025 10:08:08 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office CHIPs Program Office,

I am grateful there is still time-- though altogether too short---to comment on this Draft version of this Environmental Impact Statement that evaluates how the construction and operation of the Micron facility will effect me, my neighbors, my community, and the flora and fauna that our species tends to forget are needed to maintain a biologically, geologically and environmentally interconnected planetary system.

I was disappointed to learn that Micron's established process requires its use. We all should be concerned about our exposure to PFAS chemicals. Yes, I perhaps I do take this personally since one of the known target tissues is an organ where I am experiencing pathology. These perfluoro alkylating substances are persistent, and as such, have documented bioaccumulation in our bodies. This will be another source adding to the biological burden of those living in this area if this is not addresses in a careful and ongoing manner.

MELLENY HALE

MellAnieHale@gmail.com

405 Yale avenue

Syracuse, New York 13219

Archived: Thursday, August 14, 2025 2:38:41 PM

From: [MELLENY HALE](#)

Mail received time: Sat, 9 Aug 2025 03:48:37

Sent: Friday, August 8, 2025 11:48:38 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPs Program Office,

We all hope that the arrival of Micron's semi-conductor manufacturing facilities will have many positive impacts. But it is equally important that every effort be made to limit potential negatives. We are still dealing with the damage that was done to Onondaga Lake. Do we want this to happen to Oneida Lake, the river that leaves the Micron site and enters into Lake Ontario from which many in this area draw their drinking water?

There are plenty of examples of humans exposing others to chemical harm with devastating consequences. Micron has declared the use of perfluoro alkylating substances (PFAS) in their process. Time and exposure have revealed that industry's earliest uses of these chemicals in aqueous fire-fighting foam (AFFF) are too toxic to have continued use sanctioned by the EPA. We need to be very cautious here.

While I understand that it is daunting to list all the potential chemical hazards that may be integral to semi-conductor manufacturing, it is important that a dynamic accounting be made of the most hazardous ones.

OCWA for years published a detailed analysis of the composition of the water they supplied until that was put online (still accessible, but placed slightly out of the casual perusal for many of us). My own employer has copious, OSHA-mandated SDS information (formerly MSDS, material safety data sheets) available to us employees. Micron must also be compliant with OSHA regulations, so the breadth of this information should be shared. But it is not the scope that is most important. Rather, it is what substances leave the manufacturing site, in what quantity, and in which categories does OSHA place them in the required SDS?

The manufacturing process is not likely to change within the construction of the first two fabs, but may by the time the third and fourth fabs are begun ('necessary to achieve economy of scale' Micron states.) But there may be changes and we need to have outside citizens & experts be placed in a position where they can expect knowledge of ongoing dynamics of how waste, waste water is being monitored and controlled. This is not an appeal for regulation, but for monitoring.

Thank you for your consideration of my comments.

Sincerely,

Melleny Hale

MELLENY HALE

MellAnieHale@gmail.com

405 Yale avenue

Syracuse, New York 13219

Archived: Thursday, August 14, 2025 2:38:46 PM

From: [MELLENY HALE](#)

Mail received time: Sat, 9 Aug 2025 04:57:10

Sent: Saturday, August 9, 2025 12:57:11 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for giving our community at least 45 days to explore the Draft EIS of Micron's future semi-conductor manufacturing plants. It would have been better to have been granted longer for this review. We don't want to repeat the kind of environmental disaster that was imposed on Onondaga Lake by failure to consider the potential downsides of what may well be an overall positive to our region with Micron's arrival.

Wetlands are known geological assets in flood control and absorption. Acres of impervious surfaces (parking among them) are going to be installed at this Micron site. What is this going to do to the potential for flooding?

The replacements for obliteration of 200 acres of wetland that are being offered are not downstream of the Micron site. If this is true, I would like to see more input from designers to address flood mitigation upon downstream concerns. Flooding has been increasing worldwide as climate changes, too.

Thank you for your consideration of my comments.

Sincerely,

MELLENY HALE

MellAnieHale@gmail.com

405 Yale avenue

Syracuse, New York 13219

Archived: Thursday, August 14, 2025 2:38:51 PM

From: [MELLENY HALE](#)

Mail received time: Sat, 9 Aug 2025 04:57:25

Sent: Saturday, August 9, 2025 12:57:26 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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The replacements for obliteration of 200 acres of wetland that are being offered are not downstream of the Micron site. If this is true, I would like to see more input from designers to address flood mitigation upon downstream concerns. Flooding has been increasing worldwide as climate changes, too.

Thank you for your consideration of my comments.

Sincerely,

MELLENY HALE

MellAnieHale@gmail.com

405 Yale avenue

Syracuse, New York 13219

Archived: Thursday, August 14, 2025 2:38:56 PM

From: [melleny HALE](#)

Mail received time: Sat, 9 Aug 2025 05:00:47

Sent: Saturday, August 9, 2025 1:00:49 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPs Program Office,

I am grateful there is still time to comment on this Draft version of the EIS that evaluates how the construction and operation of the Micron facility will effect me, my neighbors, and my community in upcoming years, and beyond that, to the other living things that are affected and may be destroyed as though humans were the only species that mattered here.

Yes, I am concerned that there is a long creep toward making the habitats for creatures that must live in wetlands confined to ever decreasing space, that with every concession made yielding to the desires of humans, this may become too much.

We are losing many species everyday. It is my understanding that flying creatures, like birds and bats may not adjust to relocation attempts. They may return and fail to thrive when migrating seasonally

Bat populations have been assaulted by the White-Nose Syndrome fungus. Permanent loss of 200 acres of their wetland habitat is going to stress the population even further, will it not?

What are the chances Northern long-eared bats may not find sanctuary in a new site to which they are not acclimated?

It is further worth noting that bats consume mosquitoes in large numbers. But this very week, West Nile Virus and even more concerning, EEE, Eastern Equine Encephalitis was found in mosquitoes in Cicero Swamp only a few miles east of the Micron site.

Sincerely,

Melleny Hale

melleny HALE

MellAnieHale@gmail.com

405 Yale Avenue

Syracuse, New York 13219

Archived: Thursday, August 14, 2025 2:39:01 PM

From: lcahillhoy@tweny.rr.com

Mail received time: Sat, 9 Aug 2025 10:52:00

Sent: Saturday, August 9, 2025 6:52:01 AM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

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- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
- **Greenhouse Gases:** The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar –and without relying on renewable energy credits or using renewable energy that is already on the grid – to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,
Lynn Cahil-Hoy
Marcellus, NY

lcahillhoy@twcny.rr.com
4413 Lathrop Drive
Marcellus, New York 13108

Archived: Thursday, August 14, 2025 2:39:06 PM

From: [Leslie Lawrence](#)

Mail received time: Sat, 9 Aug 2025 13:13:14

Sent: Saturday, August 9, 2025 9:13:15 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York.

At the hearing I attended there was a gentleman who lived near the proposed Micron plant. He was legitimately concerned about his well. What are the County and Micron doing to ensure that those living near the fabs are not sickened by chemical spills or contaminated flood water?

Thank you for your consideration of my comments.

Sincerely,

Leslie Lawrence

Leslie Lawrence

lelaw1963@gmail.com

102 Stoneridge Dr.

Syracuse, New York 13214

Archived: Thursday, August 14, 2025 2:39:10 PM

From: [George Lawrence](#)

Mail received time: Sat, 9 Aug 2025 13:18:15

Sent: Saturday, August 9, 2025 9:18:16 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. DEIS must clearly confront these issues.

There is a Great Lakes Water Quality Agreement between Canada and the US which was signed in 1972 and updated in 2012. Have Onondaga County and Micron studied this international agreement and been in dialogue with Canadian officials? Will wastewater that originated with Micron going into Lake Ontario be in compliance with this agreement? with other treaties as well as the laws of nearby counties and NY State?

Thank you for your consideration of my comments.

Sincerely,
George Lawrence

George Lawrence
lelaw@twcny.rr.com
102 Stoneridge Dr.
Syracuse, New York 13214-1941

Archived: Thursday, August 14, 2025 2:39:15 PM

From: [Leslie Lawrence](#)

Mail received time: Sat, 9 Aug 2025 13:23:56

Sent: Saturday, August 9, 2025 9:23:57 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York.

One of the reasons I hope Micron succeeds is the job opportunities that women, veterans and those from disadvantaged groups could have. I am not hopeful that these opportunities are really going to materialize when Micron has made no binding commitments. Why will Micron be allowed to make such vague statements when it could energize the community and itself by stepping up and ensuring a diverse workforce?

Thank you for your consideration of my comments.

Sincerely,

Leslie Lawrence

Leslie Lawrence

lelaw1963@gmail.com

102 Stoneridge Dr.

Syracuse, New York 13214

Archived: Thursday, August 14, 2025 2:39:20 PM

From: [Jack Braunstein](#)

Mail received time: Sat, 9 Aug 2025 13:24:05

Sent: Saturday, August 9, 2025 9:24:06 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
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Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,
Jack Braunstein.

Jack Braunstein
jackbraunstein100@gmail.com
132 roosevelt ave
Syracuse, New York 13210

Archived: Thursday, August 14, 2025 2:39:25 PM

From: [Kathryn Downing](#)

Mail received time: Sat, 9 Aug 2025 13:29:04

Sent: Saturday, August 9, 2025 9:29:05 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same.

Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project. I urge consideration and response to the following issues and concerns:

- Water and Ecological Resources: The Micron project stands to destroy hundreds of acres of wetlands harboring complex engaged species habitats and providing natural flood mitigation. The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds. Ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
- Protection of Air, Water, and Workers: Microchip production requires numerous toxic chemicals, including PFAS "forever chemicals," but the DEIS does not provide sufficient detail on the types of chemicals that will be used or how continuous environmental monitoring and compliance will be enforced. The community requires clear, transparent and enforceable mechanisms to avoid contamination and degradation of air, surface waters and local wetlands, soil, and protection of worker health and safety.
- Greenhouse Gases: The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar, and without relying on renewable energy credits or using renewable energy that is already on the grid, to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

- Affordable and Abundant Water and Energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability and availability of energy and clean water for the community, nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project.
- Community and Socioeconomic Impacts: The DEIS does not address if Micron will commit to a diverse, inclusive, and accessible workplace and a family-sustaining compensation package for production workers and community groups to ensure workforce development programs and equitable hiring for marginalized local communities, provide other community benefits to ensure affordable housing and accessible public transit, and mitigate potential socioeconomic harms to the community.
- Transportation: To minimize the need to widen and add roads, and to minimize the noise and pollution of high traffic volumes, especially within the surrounding communities, it is essential that multiple modes of transportation are provided for—buses, bicycles, light rail, as well as cars and trucks.

The DEIS must clearly confront these issues. Thank you for your consideration of my comments.

Sincerely,
Kathryn Downing

Kathryn Downing
ksimmons@gmail.com
165 Maplewood Avenue
Syracuse, New York 13205

Archived: Thursday, August 14, 2025 2:39:30 PM

From: [Wendy Yost](#)

Mail received time: Sat, 9 Aug 2025 15:02:00

Sent: Saturday, August 9, 2025 11:02:01 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

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Thank you for your consideration of my comments.

Sincerely,

Wendy Yost

wyost@verizon.net

822 Glenwood Avenue

Syracuse, New York 13207

Archived: Thursday, August 14, 2025 2:39:35 PM

From: [Katie Purcell](#)

Mail received time: Sat, 9 Aug 2025 15:16:14

Sent: Saturday, August 9, 2025 11:16:15 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

To whom it may concern,

My name is Katie Purcell and I am a lifetime resident, worker, and community member of Onondaga county. I am also a graduate of Syracuse's own SUNY College of Environmental Science & Forestry (ESF). As a community member and an individual who is personally committed to human and environmental health, I am writing to comment on the Draft Environmental Impact Statement (DEIS) for Micron Technology's proposed microchip fabrication facility.

Frankly, there are numerous issues with the project as it stands dictated by the DEIS. Firstly, the proposed facility requires the decimation and/or alteration of hundreds of acres of natural wetlands that fulfill multiple valuable roles on our planet; wetlands are carbon sinks, natural filtration in our water cycle, sequester water (which mitigates flooding risk), and crucial habitat for valuable wildlife -- particularly endangered & threatened species -- just to name a few vital ecosystem services. While the DEIS proposes to restore wetlands in other areas, this proposal does not account for several pertinent issues: 1) restored wetlands are not as effective in their ecological roles (such as the benefits listed above) nor are they as biodiverse as the original, aged wetlands that will be impacted by Micron's development; 2) the production of microchips requires the use of chemicals (including but not limited to PFAs) that are known to have harmful impacts on the environment, as well as those that exist in it (plants, animals, humans, etc.). Beyond this, there is a complete lack information on how Micron intends to reduce greenhouse gas emissions.

Issues that Micron *must* address, on behalf of the affected community:

- Transparency and details on the types of chemicals used in the microchip production process, as well as how they intend to enforce environmental monitoring and due diligence to not contaminate nearby communities and surface waters with these harmful substances.
- Where are the proposed alternative locations for this project? It is a borderline essential for developers to provide alternative location considerations for proposed projects in their impact assessments, and the pros and cons of said location considerations. Knowing that wetland restoration in other areas is not nearly as beneficial or biodiverse as the wetlands that would be altered for this project, and the current DEIS is not sufficient in a disappointing plethora of ways, what other options have been considered?

To those at Micron or associated with the Semiconductor Manufacturing Project that currently reside in the area or intend to reside here in the future: are you satisfied with the efforts to mitigate harm to humans and the surrounding natural world that are outlined by this DEIS? Would you allow your children to play, live, and drink water in the surrounding areas of the Micron project, knowing that they have not considered any cumulative environmental impacts on communities? Do you intend to live downstream of this facility and its hazardous waste? Do you think that this project's contribution to climate change is a "global and regional issue," and therefore not a relevant local environmental justice issue to address in their DEIS? Do you feel safe knowing that most of the air pollution monitoring data for this DEIS comes from monitors more than 70 miles away from the project site?

From someone who has had to read multiple environmental impacts statements for school, I want you to know that this DEIS is heinously insufficient in addressing impacts of the environment and the surrounding community/individuals that will be subject to the effects of this project for years to come. I am not just a bleeding heart activist who does not understand the realities of the perceived benefits of domestic microchip production or economic growth of the area; I am a scientist and well-read member of this community who took the time to parse through this DEIS only to find that it does not address a multiplicity of concerns and issues surrounding the project as it stands. Moreover, to only allow 45 days for public comment on such a large document detailing one of the biggest construction projects in NYS history is deeply inconsiderate and downright disrespectful to the community that you seek to change forever through this project. If Micron is set on altering our community and cherished ecosystems, I implore them to show more dignified behavior and values moving forward.

Many thanks for your time and consideration,
Katie Purcell

Katie Purcell
kmprcll555@gmail.com
3296 Lafayette Rd
Jamesville, New York 13078

Archived: Thursday, August 14, 2025 2:39:40 PM

From: [Dorothy Joiner](#)

Mail received time: Sat, 9 Aug 2025 16:23:46

Sent: Saturday, August 9, 2025 12:23:48 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
- **Greenhouse Gases:** The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar –and without relying on renewable energy credits or using renewable energy that is already on the grid – to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Please consider the detrimental effects of filling in these wetlands on the local birds, bats, and other wildlife that will be displaced and have no where to go. These animals will die and that is a tragedy. I urge you to find a way to protect the wetlands, or remediate land close by before destroying what's there now. This will allow wildlife to relocate, provided that the habitat is suitable, accessible, and nearby.

Thank you for your consideration of my comments.

Sincerely,
Dorothy Joiner
President, Onondaga Audubon

Dorothy Joiner
doripj@msn.com
63 Sequoia Dr. Apt 3
Syracuse, NY, New York 13215

Archived: Thursday, August 14, 2025 2:39:45 PM

From: [Rowan Stout](#)

Mail received time: Sat, 9 Aug 2025 17:15:33

Sent: Saturday, August 9, 2025 1:15:35 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,
Rowan Stout

Rowan Stout
rubyms2005@gmail.com
312 Broad st
Syracuse, New York 13210

Archived: Thursday, August 14, 2025 2:39:50 PM

From: [Wendy Yost](#)

Mail received time: Sat, 9 Aug 2025 17:16:18

Sent: Saturday, August 9, 2025 1:16:19 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. According to Micron and the chips industry, hundreds of PFAS compounds are essential for microchip manufacture; finding replacements may take decades. PFAS are particularly difficult to remove from wastewater. Micron has not disclosed the names or risks associated with many of the chemicals they will use. The plan relies on Onondaga County to construct an industrial wastewater treatment plant to remove PFAS and other chemicals and claims no liability for contamination when the water is returned to the Onondaga County's wastewater treatment facilities. The DEIS mentions several possible treatment technologies, but makes no commitment to complete removal of PFAS. Without knowing the identities and quantities of these chemicals, it is not possible to adequately evaluate the risks to workers, the community, and the global environment. Also, there are specific commitments for monitoring contamination in the waterways, municipal water supplies, or local wells, or for informing the public. Greater specificity and stronger commitments are needed.

Thank you for your consideration.

Wendy Yot

Wendy Yost

wyost@verizon.net

822 Glenwood Avenue

Syracuse, New York 13207

Archived: Thursday, August 14, 2025 2:39:55 PM

From: [Jocelyn Aitchison](#)

Mail received time: Sat, 9 Aug 2025 17:21:22

Sent: Saturday, August 9, 2025 1:21:22 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,

Jocelyn Aitchison
jocelyn.aitchison@gmail.com
10 Concord Dr
Pittsford, New York 14534-4012

Archived: Thursday, August 14, 2025 2:40:00 PM

From: [Serena Becker](#)

Mail received time: Sat, 9 Aug 2025 19:14:10

Sent: Saturday, August 9, 2025 3:14:11 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

Serena Becker
serenabecker@gmail.com
4871 Bethel Rd
Cazenovia, New York 13035

Archived: Thursday, August 14, 2025 2:40:05 PM

From: [Mary Carney](#)

Mail received time: Sat, 9 Aug 2025 20:01:38

Sent: Saturday, August 9, 2025 4:01:40 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

Mary Carney
mary.e.carney@gmail.com
1007 Westcott Street
Syracuse, New York 13210

Archived: Thursday, August 14, 2025 2:40:09 PM

From: [Syd Kellogg](#)

Mail received time: Sat, 9 Aug 2025 20:05:06

Sent: Saturday, August 9, 2025 4:05:07 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,
Syd

Syd Kellogg
sydthekid521@gmail.com
5379 Mud Mill Rd
Brewerton, New York 13029

Archived: Thursday, August 14, 2025 2:40:14 PM

From: [Andrea Malach](#)

Mail received time: Sat, 9 Aug 2025 20:16:37

Sent: Saturday, August 9, 2025 4:16:38 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

Andrea Malach
armalach@gmail.com
2900 Parker Road
Newark, New York 14513

Archived: Thursday, August 14, 2025 2:40:20 PM

From: [Julie Hammer](#)

Mail received time: Sat, 9 Aug 2025 21:37:42

Sent: Saturday, August 9, 2025 5:37:43 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office CHIPs Program Office,

I do not think the comment period is long enough. I also think we need more public forums for people to express their concerns.

Thank you.

Julie Hammer

Julie Hammer

jhammer7136@gmail.com

PO Box 29

Eaton, New York 13334

Archived: Thursday, August 14, 2025 2:40:24 PM

From: [Julie Hammer](#)

Mail received time: Sat, 9 Aug 2025 22:01:09

Sent: Saturday, August 9, 2025 6:01:11 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office CHIPs Program Office,

I have the following concerns about Micron's proposed plant in Clay, NY:

- Loss of wetlands. Serious attention must be paid to the wetlands being built to replace harmed wetlands, including funds for ongoing wetland management.
- PFAS and other toxic chemicals: Central NY has already lived for decades with the results of companies dumping toxic chemicals into Onondaga Lake. Micron must be held to a high standard in protecting our water, soil and air, including helping to fund local water treatment plants.
- Greenhouse Gases: Micron must create a plan to generate or purchase renewable energy, without relying on renewable energy credits or forcing other energy users to buy fossil fuel energy because Micron has used most

Thank you.

Sincerely, Julie Hammer

Julie Hammer
jhammer7136@gmail.com
PO Box 29
Eaton, New York 13334

Archived: Thursday, August 14, 2025 2:40:29 PM

From: [Christine Herb](#)

Mail received time: Sat, 9 Aug 2025 23:23:22

Sent: Saturday, August 9, 2025 7:23:22 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). PLEASE PROVIDE DETAILED PLANS FOR HOW YOU WILL EFFECTIVELY ADDRESS THESE ENVIRONMENTAL ISSUES LISTED.
- **Protection of Air, Water, and Workers.** I AM VERY, VERY CONCERNED ABOUT PFAS FOREVER CHEMICALS! HOW ARE YOU GOING TO REMOVE THEM FROM THE WASTE WATER? ONONDAGA COUNTY DOES NOT HAVE THE TECHNOLOGY TO REMOVE THEM & MICRON IS CREATING THEM, SO MICRON MUST REMOVE THEM BEFORE THE WASTE WATER IS PUMPED ONTO OUR SEWAGE & WATER TREATMENT PLANTS. The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. ***Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
- **Greenhouse Gases:** The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions.

***Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar –and without relying on renewable energy credits or using renewable energy that is already on the grid – to meet New York State’s climate change objectives and the requirements of the New York Green CHIPS Act.

Affordable and abundant water and energy: The DEIS does not ensure Micron’s massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. ***The DEIS must clearly confront these issues.

MICRON SHOULD BE INSTALLING SOLAR ENERGY PANELS ON ALL SURFACES OF BULIDINGS & PARKING COVERS AS WELL AS TO FUND SOLAR PANELS ON A % OF RESIDENTIAL HOMES TO OFFSET THE MASSIVE ENERGY USAGE & NOT CAUSE INCREASED POWER COSTS TO TAXPAYERS & RESIDENTS.

• Job Access, Housing & Transportation. WE ALREADY HAVE A HOUSING CRISIS. WHAT IS MICRON GOING TO DO TO HELP & NOT FURTHER MAGNIFY THIS CRISIS? The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. INVEST IN PUBLIC TRANSPORTATION THAT IS ACCESSIBLE FROM THE INNER CITY AND SURROUNDING COMMUNITIES. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, ***the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments. I will look forward to your response to all comments from concerned residents.

Sincerely,
Christine Herb
7706 Farley Lane
Manlius, NY 13104

Christine Herb
beabeaconoflove@gmail.com
7706 Farley Ln
Manlius, New York 13104

Archived: Thursday, August 14, 2025 2:40:34 PM

From: [Hannah Bickom](#)

Mail received time: Sun, 10 Aug 2025 00:25:27

Sent: Saturday, August 9, 2025 8:25:28 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
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Thank you for your consideration of my comments.

Sincerely,

Hannah Bickom
hcbickom@gmail.com
831 Westcott St
Syracuse, New York 13210

Archived: Friday, October 10, 2025 4:06:14 PM

From: [Wendy Yost](#)

Mail received time: Sun, 10 Aug 2025 10:28:43

Sent: Sunday, August 10, 2025 6:28:44 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to respond to the Draft Environmental Impact Statement.

Micron Technology's planned semiconductor plant will require 20 million gallons of water per day. And the EPA now says that when the huge plant is done in 20 years, it would need 48 million gallons of water a day. That's double the estimate of less than a year ago, and it's more than the 40 million gallons the entire city of Syracuse uses in a day. Providing that much water to the Micron plant would require the construction of that 54-inch diameter line from Oswego to Clay, the company says. That line could cost \$100 million, and it's not clear how much taxpayers would be on the hook for. Risking our water supply to this extent, while adding toxic chemicals to it, is fool hardy. This project should at least be reduced until safer and less water intensive methods can be assured.

Wendy Yost

Wendy Yost

wyst@verizon.net

822 Glenwood Avenue

Syracuse, New York 13207

Archived: Friday, October 10, 2025 4:21:41 PM

From: [Wendy Yost](#)

Mail received time: Sun, 10 Aug 2025 14:22:53

Sent: Sunday, August 10, 2025 10:22:54 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office CHIPS Program Office,

The regulation of Lake Ontario's water levels and outflows is primarily managed by the International Joint Commission (IJC), a binational organization established by the 1909 Boundary Waters Treaty between the United States and Canada. It has been estimated that when the Micron is fully operational, its water needs will well exceed the amount allowed by this international agreement. What steps are being take to assure that we are meeting our international agreement with specific, commitments, and proven methods of the reducing the amount of water are needed? Does Micron commit to only using the amount of water from lake Ontario that can be withdrawn without damaging this vital water asset?

Wendy Yost

Wendy Yost

wyost@verizon.net

822 Glenwood Avenue

Syracuse, New York 13207

Archived: Friday, October 10, 2025 4:23:57 PM

From: [Wendy Yost](#)

Mail received time: Sun, 10 Aug 2025 14:49:05

Sent: Sunday, August 10, 2025 10:49:05 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office CHIPS Program Office,

Thank you for the opportunity to comment on the environmental impact study related to Micron development in Clay, New York

The plans addressing the huge energy consumption of the project are insufficient. The completed project will use as much power as all CNY customers in CNY, yet the proposed renewable energy projects on site account for .0003% of Micron's electricity needs. The project proposes to buy renewable energy credits, but available energy credits are already supplying energy to local customers. Soaking up existing energy supply will increase utility costs for local customers. Where will this new demand electricity come from and who is responsible for developing it? Specificity and commitments are needed.

Wendy Yost

wyost@verizon.net

822 Glenwood Avenue

Syracuse, New York 13207

Archived: Friday, October 10, 2025 4:29:12 PM

From: [Wendy Yost](#)

Mail received time: Sun, 10 Aug 2025 14:52:18

Sent: Sunday, August 10, 2025 10:52:19 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York.

Local taxpayers are footing the bill for much of the infrastructure for this project. Micron anticipates hiring people from 700 local households and 2600 households outside of the local area. The influx of population is likely to increase housing costs for local residents while the Syracuse has the highest poverty rate of all U.S. Cities and an overall poverty rate of 29%. Micron expects state and local resources to address the housing shortage the project will cause. What specific enforceable commitments is Micron making for local hiring, addressing an anticipated housing shortage, and addressing local poverty, which are stated justifications for investing local resources?

Wendy Yost

Wendy Yost

wyst@verizon.net

822 Glenwood Avenue

Syracuse, New York 13207

Archived: Friday, October 10, 2025 4:35:45 PM

From: [Wendy Yost](#)

Mail received time: Sun, 10 Aug 2025 14:55:07

Sent: Sunday, August 10, 2025 10:55:08 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York.

According to Micron and the chips industry, hundreds of PFAS compounds are essential for microchip manufacture; finding replacements may take decades. PFAS are particularly difficult to remove from wastewater. Micron has not disclosed the names or risks associated with many of the chemicals they will use. The plan relies on Onondaga County to construct an industrial wastewater treatment plant to remove PFAS and other chemicals and claims no liability for contamination when the water is returned to the Onondaga County's wastewater treatment facilities. The DEIS mentions several possible treatment technologies, but makes no commitment to complete removal of PFAS. Without knowing the identities and quantities of these chemicals, it is not possible to adequately evaluate the risks to workers, the community, and the global environment. Also, there are specific commitments for monitoring contamination in the waterways, municipal water supplies, or local wells, or for informing the public. Greater specificity and stronger commitments are needed.

Thank you.

Wendy Yost

Wendy Yost

wyost@verizon.net

822 Glenwood Avenue

Syracuse, New York 13207

Archived: Friday, October 10, 2025 4:40:00 PM

From: [Wendy Yost](#)

Mail received time: Sun, 10 Aug 2025 15:09:34

Sent: Sunday, August 10, 2025 11:09:35 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York.

Micron proposes to restore "some of the wetlands" destroyed by the project and does not account for loss of carbon sequestration from wetland destruction in the evaluation of green house gas emissions. Other development projects have a wetland replacement ratio of 10 to 15:1 compared to Micron's 2:1. Additionally, none of these potential restored wetlands will mitigate flooding caused by the Micron development, as these restored wetlands are not downstream of Micron.

What additional commitments will Micron make to insure adequate mitigation of the impacts of destruction of a wetland site? That is, what commitments will micron make regarding monitoring and mitigation of the the impacts on endangered species, destruction of wetlands' potential for carbon sequestration, and the increased risk of flooding.

Wendy Yost

wyost@verizon.net

822 Glenwood Avenue

Syracuse, New York 13207

Archived: Friday, October 10, 2025 1:57:14 PM

From: [Barb Root](#)

Mail received time: Sun, 10 Aug 2025 17:23:31

Sent: Sunday, August 10, 2025 1:23:32 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
- **Greenhouse Gases:** The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar –and without relying on renewable energy credits or using renewable energy that is already on the grid – to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,

Barb Root

broot1@twcny.rr.com

4125 cedarvale rd

Syracuse, New York 13315

Archived: Friday, October 10, 2025 1:29:14 PM

From: [Mary Lynn](#)

Mail received time: Sun, 10 Aug 2025 18:04:14

Sent: Sunday, August 10, 2025 2:04:15 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response by OCIDA or Micron to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.

The issue of the destruction of approximately 300 acres of wetlands habitat is of particular concern to me. Since the late 1700's, more than half of all wetlands in the lower 48 states have been destroyed. Contrary to the characterization of the Town of Clay wetlands in the DEIS as "vacant" land, wetlands are a highly productive and biologically diverse habitat that enhance water quality, control erosion, maintain stream flows, store carbon and provide a home to at least ONE-THIRD of all threatened and endangered species, including birds, fish, amphibians, specialized plants and other wildlife. Wetlands also provide recreational opportunities for fishing, hunting, photography and wildlife observation.

With respect to the wetlands in the Town of Clay on which Micron intends to build its manufacturing plant, there are several endangered and threatened species that breed and live there, including the Indiana, Long-eared and Tri-colored bats, and Northern Harriers and Short-eared Owls. Many other bird species, and other fauna, rely on the wetlands, grasslands and forest in the proposed Micron plant location for their survival. Habitat loss and

fragmentation have contributed significantly to declines in bird populations in the United States. A recent study done by the Cornell Lab of Ornithology concluded that since 1970, the United States and Canada have experienced a staggering loss of 3 BILLION breeding adult birds. Micron's proposed solution to mitigate the destruction of almost 300 acres of wetlands in the Town of Clay is to purchase several fragmented parcels of land which are currently in agricultural use. The proposed ratio of wetlands replacement is 2:1. The replacement parcels are smaller fragments of land that will take decades before they become mature wetlands. Micron's proposal to replace the destroyed wetland is inadequate. Micron should be required to acquire larger nearby quality habitat blocks to help displaced birds and other animals relocate. In addition, the wetland replacement ratio should be at least 7:1 acres (acres replaced to acres lost), not 2:1.

- Protection of Air, Water, and Workers. The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.

I am also very concerned about the effect of the hazardous chemicals Micron uses in its manufacturing process on the air quality and drinking water supply in Onondaga County, and other nearby counties. The manufacture of microchips uses a variety of toxic chemicals, such as Forever Chemicals (PFAS). PFAS can accumulate in the environment and in living organisms leading to widespread contamination. PFAS are associated with several health risks to humans, including increased cholesterol levels, hormonal disruptions, certain cancers, liver damage and developmental issues in children. Micron has not released a list of PFAS and other chemicals they will use their manufacturing process, which makes a full risk assessment impossible. PFAS and other chemicals used in Micron's manufacturing process will be disposed of in contaminated wastewater, which will be treated at an expanded wastewater treatment plant in the Town of Clay. While The DEIS mentions several possible treatment technologies to remove any remaining harmful chemicals from Micron's treated wastewater, it makes no commitment to the complete removal of PFAS. Without regulatory controls, it is very likely that some PFAS compounds will be released into local waterways, including the Oswego River and ultimately, into Lake Ontario.

The Onondaga County Water Authority provides drinking water to most residents of Onondaga, Oswego, Madison, Oneida and Cayuga Counties - a population of almost 1,000,000 people. Almost Fifty Percent (50%) of the drinking water in Onondaga County comes from Lake Ontario. All of the drinking water in Oswego, Madison, Oneida and Cayuga Counties comes from Lake Ontario. The water intake system for drinking water is located in Lake Ontario within two miles of the mouth of the Oswego River. If contaminated wastewater containing traces of PFAS and other chemicals is discharged into the Oswego River and ends up in Lake Ontario, it could easily affect the quality of the drinking water provided to almost 1,000,000 people in Central New York. This would have disastrous results on the health of Central New York residents.

It is imperative that Micron release a list of the chemicals it will use in its manufacturing process. In addition, the treatment of wastewater from the manufacturing process needs to be continually monitored to ensure that harmful chemicals are not released into local waterways

which would negatively affect the drinking water of Central New Yorkers. The monitoring reports must be available to the public so that residents are informed whether the quality of their drinking water has been affected. This includes residents who have private residential wells - an issue that Micron has not addressed.

Finally, the DEIS does not address any issues that may arise under the Great Lakes Water Quality Agreement (GLWQA). The GLWQA is a commitment between the United States and Canada to restore and protect the waters of the Great Lakes. It provides a framework for identifying binational priorities and implementing actions that improve water quality.

- Greenhouse Gases: The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar –and without relying on renewable energy credits or using renewable energy that is already on the grid – to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

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Central New York is a wonderful place to live - part of the reason for this includes clean water and good air quality, and an abundance of of wildlife. While the community welcomes the government's and Micron's plans to build a microchip manufacturing plant in Onondaga County, most of us do not want another "Onondaga Lake" experience in which local industry created the most polluted lake in the United States. Thank you for your consideration of my comments.

Sincerely,
Mary Lynn

Mary Lynn
kathleenlynnlaw@gmail.com
132 Pine Ridge Road
Fayetteville, New York 13066

Archived: Friday, October 10, 2025 2:23:03 PM

From: [Matt Schaefer](#)

Mail received time: Sun, 10 Aug 2025 18:16:16

Sent: Sunday, August 10, 2025 2:16:17 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

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Thank you for your consideration of my comments.

Sincerely,
Matt Schaefer

Matt Schaefer
mschaefer390@gmail.com
106 Kimry Moor
Fayetteville, New York 13066

Archived: Thursday, August 14, 2025 2:41:23 PM

From: [Leslie Lawrence](#)

Mail received time: Sun, 10 Aug 2025 18:43:45

Sent: Sunday, August 10, 2025 2:43:46 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPs Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York.

After this DEIS report what information will the public receive concerning Micron? It appears that there are no periodic outside monitors or updates required. Let's say two years from now there's a chemical incident that affects people inside and/or beyond the plant. Will Micron be allowed to hide problems inside the plant and turn the other way when there are problems outside the plant? What is Micron required to make public?

Thank you for your consideration of my comments.

Sincerely,

Leslie Lawrence

Leslie Lawrence

lelaw1963@gmail.com

102 Stoneridge Dr.

Syracuse, New York 13214

Archived: Friday, October 10, 2025 12:20:28 PM

From: [Ethan Gormley](#)

Mail received time: Sun, 10 Aug 2025 19:44:26

Sent: Sunday, August 10, 2025 3:44:27 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
- **Greenhouse Gases:** The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar –and without relying on renewable energy credits or using renewable energy that is already on the grid – to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,

Ethan Gormley
ethanssg@hotmail.com
4170 Wetzal Road
Liverpool, New York 13090

Archived: Thursday, August 14, 2025 2:41:33 PM

From: lucinda.coffin@gmail.com

Mail received time: Sun, 10 Aug 2025 19:45:12

Sent: Sunday, August 10, 2025 3:45:13 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

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Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,

lucinda.coffin@gmail.com
3487 McClary Rd
LA FAYETTE, New York 13084

Archived: Friday, October 10, 2025 2:57:56 PM

From: mgsmith1000@yahoo.com

Mail received time: Sun, 10 Aug 2025 19:45:19

Sent: Sunday, August 10, 2025 3:45:20 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

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Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

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Thank you for your consideration of my comments.

Sincerely, Malcolm Smith

mgsmith1000@yahoo.com
6008 Bay Hill Cir
Jamesville, New York 13078

From: nbarnum2@yahoo.com <noreply@adv.actionnetwork.org>
Sent: Sunday, August 10, 2025 3:46 PM
To: chipsnepa
Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

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Thank you for your consideration of my comments.

Sincerely,
Nancy Barnum

nbarnum2@yahoo.com
514 Glenwood Avenue
Syracuse, New York 13207

From: Tom Zorn <noreply@adv.actionnetwork.org>
Sent: Sunday, August 10, 2025 3:50 PM
To: chipsnepa
Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

CHIPS Program Office CHIPS Program Office,

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I urge consideration and response to the following issues and concerns:

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I understand that substituting small separate parcels of land is not an effective way to protect threatened and endangered species that are currently inhabiting a larger contiguous wetland.

- Protection of Air, Water, and Workers. The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities,

including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.

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Thank you for your consideration of my comments.

Sincerely,
Tom Zorn

Tom Zorn
milestzorn@gmail.com
321 Scott Avenue
Syracuse, New York 13224

Archived: Friday, October 10, 2025 12:44:20 PM

From: [Lisa Harrell-DeLamater](#)

Mail received time: Sun, 10 Aug 2025 19:51:59

Sent: Sunday, August 10, 2025 3:52:00 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Lisa Harrell-DeLamater
lisaharrdel@gmail.com
223 Edwards Dr.
Fayetteville, New York 13066

Archived: Friday, October 10, 2025 2:00:31 PM

From: [Mark Rupert](#)

Mail received time: Sun, 10 Aug 2025 19:56:08

Sent: Sunday, August 10, 2025 3:56:09 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office CHIPS Program Office,

We have several serious concerns about the Micron project, but the most serious concerns involve the massive strain on the NYS electrical grid, the huge demand for water resources, and the greenhouse gas emissions resulting from burning natural gas in the plant's operations.

Mark Rupert
markrupert1957@gmail.com
954 Westmoreland Ave
Syracuse, New York 13210

Archived: Thursday, August 14, 2025 2:41:58 PM

From: [Felicia Castricone](#)

Mail received time: Sun, 10 Aug 2025 19:57:23

Sent: Sunday, August 10, 2025 3:57:24 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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I particularly love want to ensure that Micron creates pathways for New Americans and impoverished populations to secure jobs at Micron, whether through targeted, free educational opportunities or other career development opportunities.

Thank you for your consideration of my comments.

Sincerely, Felicia Castricone

Felicia Castricone
castriconef@yahoo.com
232 Norwood Avenue
Syracuse, New York 13206

Archived: Friday, October 10, 2025 2:43:10 PM

From: [Mal Smith](#)

Mail received time: Sun, 10 Aug 2025 20:00:37

Sent: Sunday, August 10, 2025 4:00:38 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

I think there needs to be 1000 acres of wetlands to replace the 200 taken out and the equivalent number of trees taken out should be replaced in an area as close to sites being damaged as possible.

Malcolm Smith

Mal Smith

mgsmith1000@yahoo.com

6008 Bay Hill Cir

Jamesville, New York 13078

Archived: Friday, October 10, 2025 2:13:08 PM

From: [Matt Salerno](#)

Mail received time: Sun, 10 Aug 2025 20:02:11

Sent: Sunday, August 10, 2025 4:02:12 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office CHIPS Program Office,

I'd like to start by stating that I believe that Micron's project is an incredibly valuable investment for Central New York and the US as a whole. Bringing back domestic manufacturing jobs is incredibly important to rebuilding the local economy. However, I have several concerns regarding the Draft Environmental Impact Report which I would like to address.

CNY residents deserve more information on the impact of chemical runoff from the plant and how Micron plans to safely dispose of it. Chemical byproducts are an inevitable part of the manufacturing process, but Micron needs to be responsibly disposing of these materials so as to not disrupt the local ecosystem—especially considering the massive habitat displacement from building the plant. Moreover, forever chemicals are a huge health and safety hazard for CNY residents and especially children, many of whom are already dealing with the adverse effects of lead in their homes. We need more information on how Micron plans to safely contain and dispose of this waste.

We also deserve a more robust plan of action on how the Micron fab will be powered. Specifically, we need to know that the facility will effectively utilize renewable energy so as to not disrupt the grid or raise prices for locals. Solar and wind power would be great options in the massive open fields surrounding the plant, and pairing those with batteries will allow for short-term power storage to ensure a consistent power supply.

These are the issues I'm most concerned with regarding the semiconductor plant. Again, I'm a huge proponent of the plan and I believe it will be an overall net good for the people of Syracuse. But the point of the CHIPS Act was to invest in the American people—not big business. Central New York deserves a better deal for our economy and for our health. I hope you take these concerns seriously and bring a stronger plan of action to the table.

Sincerely,

Matt Salerno

Matt Salerno
mattpsalerno@gmail.com
311 Forman Ave
Syracuse, New York 13210

Archived: Friday, October 10, 2025 2:07:12 PM

From: [Craig Russell](#)

Mail received time: Sun, 10 Aug 2025 20:05:48

Sent: Sunday, August 10, 2025 4:05:50 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPs Program Office,

Im concerned about the water contamination that the plant will generate.

What will Micron do to ensure that the PFAS and other chemical compounds will not harm our drinking water?

Will Micron monitor for these discharges, and act if the quantities exceed expectations?

Thank you.

Craig Russell

csrussell6307@gmail.com

6307 LONE WOLF DRIVE

Jamesville, New York 13078

Archived: Friday, October 10, 2025 12:16:37 PM

From: [Julia Ganson](#)

Mail received time: Sun, 10 Aug 2025 20:08:17

Sent: Sunday, August 10, 2025 4:08:18 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I do not think that the development of a Micron plant will be a positive one in Syracuse. Although it may create more jobs, I believe the environmental impact will be devastating. Particularly the incredible energy usage (5% more for the State of NY) and water requirements make it a huge danger to human life, wildlife, and the earth itself.

I urge consideration and response to the following issues and concerns which many other people and organizations have raised:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.

- Greenhouse Gases: The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar –and without relying on renewable energy credits or using renewable energy that is already on the grid – to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,

Julia Ganson
gansonjuli@gmail.com
100 Janet Drive
Syracuse, New York 13224

Archived: Thursday, October 9, 2025 5:05:38 PM

From: [Iris Arno](#)

Mail received time: Sun, 10 Aug 2025 20:12:26

Sent: Sunday, August 10, 2025 4:12:26 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPs Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. I am submitting a comment within the 45-day public comment period but I must protest that this short window for public participation is ridiculously inadequate given the scope of the project and the 20,000-page report. Are you serious???? I request an extension of the comment period to October 25, 2025, at a bare minimum. By the way, why has there been no public response to a petition signed by over 1500 residents of the region asking the same?

Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

What I have learned about this project has me horrified about the following:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
- **Greenhouse Gases:** The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar –and without relying on renewable energy credits or using renewable energy

that is already on the grid – to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

This project is a huge monstrosity that threatens the environment (wetlands, water, air), does nothing to help the economic plight of many people in the region, and is wildly oversized. Every time I learn more about it, my heart sinks. Do not allow this to happen!

Thank you for your consideration of my comments.

Sincerely,

Iris Arno
hisk37@gmail.com
37 Garland Drive
Hastings on Hudson, New York 10706

Archived: Friday, October 10, 2025 1:47:17 PM

From: [Lizmarie Montemayor](#)

Mail received time: Sun, 10 Aug 2025 21:02:07

Sent: Sunday, August 10, 2025 5:02:07 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office CHIPS Program Office,

I'd like to start by stating that I believe that Micron's project is an incredibly valuable investment for Central New York and the US as a whole. Bringing back domestic manufacturing jobs is incredibly important to rebuilding the local economy. However, I have several concerns regarding the Draft Environmental Impact Report which I would like to address.

CNY residents deserve more information on the impact of chemical runoff from the plant and how Micron plans to safely dispose of it. Chemical byproducts are an inevitable part of the manufacturing process, but Micron needs to be responsibly disposing of these materials so as to not disrupt the local ecosystem—especially considering the massive habitat displacement from building the plant. Moreover, forever chemicals are a huge health and safety hazard for CNY residents and especially children, many of whom are already dealing with the adverse effects of lead in their homes. We need more information on how Micron plans to safely contain and dispose of this waste.

We also deserve a more robust plan of action on how the Micron fab will be powered. Specifically, we need to know that the facility will effectively utilize renewable energy so as to not disrupt the grid or raise prices for locals. Solar and wind power would be great options in the massive open fields surrounding the plant, and pairing those with batteries will allow for short-term power storage to ensure a consistent power supply.

These are the issues I'm most concerned with regarding the semiconductor plant. Again, I'm a huge proponent of the plan and I believe it will be an overall net good for the people of Syracuse. But the point of the CHIPS Act was to invest in the American people—not big business. Central New York deserves a better deal for our economy and for our health. I hope you take these concerns seriously and bring a stronger plan of action to the table.

Sincerely,
Lizmarie Montemayor

Lizmarie Montemayor
lizma00953@gmail.com
311 Forman Ave
Syracuse , New York 13210

Archived: Friday, October 10, 2025 1:31:11 PM

From: [Cheryl Matt](#)

Mail received time: Sun, 10 Aug 2025 21:32:28

Sent: Sunday, August 10, 2025 5:32:30 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed 16 year project, namely building a semiconductor manufacturing facility in Clay, New York. Even though we were able to submit the following comments, the 45-day public comment period does not realistically give the public enough time to read and fully understand a 20,000-page report. I request that you extend the comment period to October 25, 2025, at a minimum. (Please also note that there has been no public response to petitions signed by residents of the region asking the same.) Based on my current understanding of the DEIS, through reading and attending 3 workshops with area biology professors and experts, I want to highlight a few key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues. There is not a sustainable plan to account for wetland loss and degradation. "Making" new wetlands in Oswego county will not mitigate flooding or storm water runoff from the acres and acres of impervious surface the four fabs will bring. The loss of bird habitat, especially aquatic birds, as well as habitat for endangered bats and other endangered species cannot be easily replaced. And who will tell the bats and birds that their roosting and nesting areas have moved? Nature may not cooperate with Micron's plans.
- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination and pollution of air, drinking and recreational water, and soil or protect worker health and safety given the intensive use of toxic, hazardous chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols. The water use of the facility as well as the electricity consumption is almost unfathomable.
- **Greenhouse Gases:** The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar without relying on renewable energy credits or using renewable energy that is

already on the grid. Again, this project must be sustainable to survive its permanent stance in Upstate New York. Energy credits and grants can be pulled at any time.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron, particularly for production workers. Most of the jobs typically associated with manufacturing plants like Micron are not "high-paying" jobs as promised. Where will the necessary workers come from, where will they live, how will they be trained, how will they get to work, and will this project lift up the poverty level of our area or make it worse? We have seen presentations from the Micron community and elected officials selling this project. Many of us who have lived here for over 50 years are not convinced that there will be a positive effect in this area. We've embraced change in the past and don't want this huge endeavor to be a disappointment for my grandchildren. The DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,

Cheryl Matt
310 Collin Ave.
Fayetteville, NY 13066
315-420-9210

Cheryl Matt
cmattphotos@gmail.com
310 Collin Ave
Fayetteville, New York 13066

Archived: Friday, October 10, 2025 3:34:27 PM

From: doug.wolf.1948@gmail.com

Mail received time: Sun, 10 Aug 2025 21:33:41

Sent: Sunday, August 10, 2025 5:33:42 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

I understand that the Micron project will increase demand for electricity by 5% (using all of NY State as a base). This projected increase in demand for electricity will surely lead to higher electricity prices for everyone. This is a consequence of a basic law of economics relating to supply, demand, and price. These price increases will, in turn, be burdensome for many people, the general public, and so on. These cost increases will be widely dispersed and universally experienced, but the benefits of the Micron development may not be so widely dispersed. Please show some consideration of the way costs and benefits are distributed.

doug.wolf.1948@gmail.com

113 Dorset Road

Syracuse, New York 13210

Archived: Friday, October 10, 2025 1:18:59 PM

From: [Leslie Lawrence](#)

Mail received time: Sun, 10 Aug 2025 21:54:25

Sent: Sunday, August 10, 2025 5:54:26 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPs Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York.

Unregulated use of PFAS is an enormous concern. Back when Onondaga Lake was polluted maybe people did not know better but we do now. These chemicals will find their way onto our land through spills, into our water through discharge and/or waste, or will be emitted into the air we breath. History has shown us over and over again that when chemical safeguards are not as strong as they need to be or when accidents happen, disaster follows. People, animals and plants are exposed, become sickened or suffer death by chemicals. Keeping the chemical list secret from workers and the public for profits or for any business reason, is cruel. The public deserves to know the names and amounts of chemicals that will be used. Doesn't the medical community need to know what chemicals are being used so that as people are affected doctors know what they're dealing with and how to treat people? Micron and Onondaga County can do better. Why won't they put people first?

Thank you for your consideration of my comments.

Sincerely,

Leslie Lawrence

Leslie Lawrence

lelaw1963@gmail.com

102 Stoneridge Dr.

Syracuse, New York 13214

Archived: Friday, October 10, 2025 12:48:43 PM

From: [George Lawrence](#)

Mail received time: Sun, 10 Aug 2025 22:01:02

Sent: Sunday, August 10, 2025 6:01:03 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York.

Micron will pretreat wastewater but may not remove all the toxic chemicals. Onondaga County is responsible for removing the toxic chemicals that remain. One question is how will Onondaga County assure us that the toxic chemicals have been removed from wastewater if Micron does not let them have the list of chemicals they need to remove? Why is Onondaga County agreeing to bear the ultimate responsibility for the removal of chemicals in water? Years from now when Micron's chemicals are found in our rivers and Lake Ontario, Onondaga County will be financially responsible for all the damage. This a devil's bargain.

Thank you for your consideration of my comments.

Sincerely,
George Lawrence

George Lawrence
lelaw@twcny.rr.com
102 Stoneridge Dr.
Syracuse, New York 13214-1941

Archived: Friday, October 10, 2025 3:53:04 PM

From: elainewolf0148@gmail.com

Mail received time: Sun, 10 Aug 2025 22:19:19

Sent: Sunday, August 10, 2025 6:19:20 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office CHIPS Program Office,

I am most concerned about the environmental consequences of the planned Micron plant.

To create the required amount of electricity for Micron's manufacturing of chips it will be necessary to use water from existing wetlands which are habitats for wildlife. The plan is to replace these wetlands with unconnected parcels of land. By the amount of time it will take for these parcels to become wetlands on the scale of today's, it is very likely that many species of flora and fauna will have been brought to extinction locally.

The use of PFAS and other potentially hazardous chemicals will be present in the waste water that will be treated (however unlikely that the toxins will be effectively removed), discharged into public waterways, and potentially threaten the safety of drinking water in the region. Solid waste will also be a threat to the health and safety of local residents.

This project appears to me not to have been thoroughly vetted as to either safety or soundness of implementation. Residents of the region deserve a more well-grounded approach.

Thank you.

Elaine Wolf

elainewolf0148@gmail.com

113 Dorset Rd

Syracuse, New York 13210

Archived: Friday, October 10, 2025 3:31:05 PM

From: wlipke50@gmail.com

Mail received time: Sun, 10 Aug 2025 22:22:48

Sent: Sunday, August 10, 2025 6:22:49 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
- **Greenhouse Gases:** The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar –and without relying on renewable energy credits or using renewable energy that is already on the grid – to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,

wipke50@gmail.com
3282 Greenleaf Drive
Phoenix, New York 13135

Archived: Friday, October 10, 2025 1:22:59 PM

From: [Martha Lawson](#)

Mail received time: Mon, 11 Aug 2025 01:00:07

Sent: Sunday, August 10, 2025 9:00:09 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same.

I urge consideration and response to the following issues and concerns:

HOUSING: The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant. The DEIS offers no concrete suggestions or solutions to meet that demand other than to rely on State and County programs. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

TRANSPORTATION: The DEIS includes a study of the traffic in the area around the proposed plant site. The study notes that there is currently little to no bus service in the area near the plant which leaves the only transportation alternative to be cars. The study suggests the widening of Route 31 in addition to changing the type of exit lanes from 481. Increasing the number and frequency of bus routes would lessen the number of cars on the road and make jobs at the site accessible to all potential employees. The DEIS must address how Micron will work with the county and CENTRO to establish these routes including safe and secure bus stops.

Thank you for your consideration.

Sincerely,

Martha Lawson

Martha Lawson

martha.lawson279@gmail.com

22 Bayberry Circle

LIVERPOOL, New York 13090-2908

Archived: Friday, October 10, 2025 12:15:21 PM

From: [Matthew Denton](#)

Mail received time: Mon, 11 Aug 2025 01:40:56

Sent: Sunday, August 10, 2025 9:40:57 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

I am writing in concern of the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York.

It is unrealistic for residents to have only 45 days to read the 20,000 report. County staff had over 6 months to review the document. We should be given the same consideration as this directly impacts all residents of Onondaga and surrounding communities. The comment period should be extended to February of 2026. In addition there should be additional town halls throughout Onondaga County and presentation to the community outlining the various build phases and how our natural environment will be impacted directly and indirectly.

At this time the county is pushing the promise of new jobs "growth" and is failing to inform residents of the actual details of the project to their communities.

Sincerely,
Matthew J. Denton

Matthew Denton
matt@mdbitz.com
4600 Whetstone Rd
Manlius, New York 13104

Archived: Friday, October 10, 2025 1:53:22 PM

From: [Mary O'Reilly](#)

Mail received time: Mon, 11 Aug 2025 02:51:10

Sent: Sunday, August 10, 2025 10:51:11 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPs Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.

Engineered wetlands do not provide the connectivity provided by naturally occurring wetlands regardless of how well they are initially constructed. They fail over time. The DEIS states that the engineered wetlands will be monitored, sometimes every other year, for 10 years. The engineered wetlands should function forever. Once the required monitoring stops there is no accountability. This is unacceptable.

One of the functions of wetlands is to reduce and minimize flooding. The engineered wetlands are not in the same sub-watershed where Micron will destroy 200 acres of wetlands. In addition to destroying wetlands there will be a substantial increase in impervious surfaces in the Town of Clay and beyond due to widening of roads as well as housing and business construction which will further increase the risk of flooding in the Town of Clay and beyond.

- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use

of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.

PFAS is essential to chip making. Although Micron will treat some of its wastewater on site there will be a significant increase in the wastewater flow from Micron to the Onondaga Wastewater Treatment Plant on Onondaga Lake which does not have the technology to remove PFAS or most other industrial chemicals despite assurances to the contrary. As an industrial hygienist for New York State, I spent many weeks there working with WEP to increase the health and safety of the employees of the plant.

Micron will use significant amounts of water in its industrial process. Although Lake Ontario appears as an inexhaustible source of water, it will eventually receive all the contaminants that cannot be removed by the Onondaga Wastewater Treatment Plant. Eventually, maybe sooner than any of us would like to think, one of the sources of drinking water for Onondaga County will become undrinkable. This is not a good trade-off for a short-term gain.

- **Greenhouse Gases:** The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar –and without relying on renewable energy credits or using renewable energy that is already on the grid – to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues. Although nuclear energy does not increase our carbon footprint the effects of radiation are significant and not trivial. I am not sure what has made people in this decade think that nuclear energy is without consequences. The concerns that were widely acknowledged 50 years ago have not been removed.

- **Job Access, Housing & Transportation.** The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

One question that I would like people to consider is why build Micron in a wetland in a community that already faces increased flooding threats. Why wasn't a location like the Great Northern Mall considered? Malls are failing but have a large footprint that has already been established.

Thank you for your consideration of my comments.

Sincerely,

Mary O'Reilly

Mary O'Reilly

ARLS.OReilly@gmail.com

7705 Farley Lane

Manlius, New York 13104-9571

Archived: Friday, October 10, 2025 12:42:05 PM

From: [jonathan Haney](#)

Mail received time: Mon, 11 Aug 2025 02:56:24

Sent: Sunday, August 10, 2025 10:56:25 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
- **Greenhouse Gases:** The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar –and without relying on renewable energy credits or using renewable energy that is already on the grid – to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

- Use of existing brownfield sites. The DEIS does not explain why no existing brownfield sites such as the Great Northern Mall were considered rather than utilizing virgin wet lands for the site.

Thank you for your consideration of my comments.

Sincerely,

Jonathan Haney

jonathan Haney

haney.jonathan@gmail.com

7705 Farley Ln

Manlius, New York 13104

Archived: Friday, October 10, 2025 12:05:59 PM

From: [Elaine Denton](#)

Mail received time: Mon, 11 Aug 2025 03:09:19

Sent: Sunday, August 10, 2025 11:09:20 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

This is a multigenerational project that will impact all of Central New York. A 45 day public comment period and 1 public hearing during the summer especially for parents who are extra busy is not enough time to read and fully understand this 20,000 page report. I am asking you to extend the comment period to October 25, 2025, at a minimum.

Transparency

A dedicated website for reporting on air quality, water quality, important updates on this project, a list of where our tax dollars are being spent and more should be created. An example is the outreach and status updates on the I-81 project.

With a project of this size, there should be additional reviews as each fab is built to review the real time impacts of this project.

Environment

I am concerned about chemicals, specifically PFAS or forever chemicals, that could enter Oneida River and discharge to Lake Ontario next to OCWA's water intake pipe affecting our drinking water. How will our drinking water be protected?

Flooding

This area already experiences flooding and with extreme weather events occurring more frequently where will the water that is currently stored in this wetland go? The new wetlands that are being proposed are not downstream and will take decades to form. The wetland replacements ratio should be higher than 2:1 and should include new & mature wetlands. There also needs to be more details about stormwater runoff.

Renewable Energy

Add solar to cover your parking lots to expand solar on this project. Solar should be covering as many areas as possible at this site.

Transportation

I see a proposed shuttle for construction workers but not for the 9,000 employees. By providing a shuttle for Micron workers, this could reduce the need for 12,000 parking spaces reducing the impervious surfaces and help make sure these jobs are available to everyone in our community. Investing in our public transportation is needed to increase access to these jobs.

Traffic

Will this project increase rail traffic at the DeWitt rail yard? An exit to this rail yard from I-481 is needed as trucks continue to use local roads, increasing traffic and safety concerns in the Town of Dewitt & Manlius.

I am also concerned with the suggestions of widening roads, as we know this increases speeds and makes roads less safe. We need to balance the traffic with best practices of complete streets wherever possible to keep transportation options beyond cars.

Housing

Onondaga County is already experiencing a housing crisis. The DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Jobs

What is the percentage of the 9,000 jobs that pay under \$100,000?

Many of these promises from Micron need to be in a community benefit agreement.

Thank you for your consideration of my comments and questions.

Sincerely,

Elaine Denton
elainementon@gmail.com
4600 Whetstone Rd
Manlius, New York 13104

Archived: Thursday, October 16, 2025 9:53:33 AM

From: [Sue Hammond](#)

Mail received time: Mon, 11 Aug 2025 05:21:51

Sent: Monday, August 11, 2025 1:21:52 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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I urge consideration and response to the following issues and concerns:

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Thank you for your consideration of my comments.

Sincerely,

Sue Hammond
s1p0h2@protonmail.com
102 Elaine Ave
North Syracuse, New York 13212

Archived: Thursday, October 16, 2025 10:48:23 AM

From: [William Spreter](#)

Mail received time: Mon, 11 Aug 2025 12:18:22

Sent: Monday, August 11, 2025 8:18:23 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

William Spreter
wspreter@gmail.com
436 Hourglass Lane
Baldwinsville , New York 13027

Archived: Thursday, October 16, 2025 9:23:22 AM

From: [Nancy DiFlorio](#)

Mail received time: Mon, 11 Aug 2025 14:29:02

Sent: Monday, August 11, 2025 10:29:03 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

Nancy DiFlorio
diflorio.nancy2@gmail.com
546 South Avery Avenue
Syracuse, New York 13219

Archived: Thursday, October 16, 2025 10:48:28 AM

From: [Jamie Shinn](#)

Sent: Monday, August 11, 2025 11:05:10 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

Attachments:

[img-2fe43498-b41d-4c1f-8fd2-6db1df10b175](#)  [Shinn_Micron_DEIS_Comments.pdf](#) 

Dear CHIPS Program Office:

Attached please find my comments on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York.

Sincerely,
Jamie Shinn

Jamie Shinn, PhD
Associate Professor
Dept. of Environmental Studies
Marshall Hall 224
SUNY College of Environmental Science and Forestry (ESF)
Email: jeshinn@esf.edu
Phone: 315-565-3022

Archived: Thursday, October 16, 2025 9:30:41 AM

From: [Heidi Escobar](#)

Mail received time: Mon, 11 Aug 2025 15:22:23

Sent: Monday, August 11, 2025 11:22:24 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Here are my concerns with the Micron fabrication facilities project in Clay, NY.

What efforts to mitigate or counter the effects of the planned hundreds of acres of impervious surfaces created? What will be done to detoxify the water runoff that will occur as rain washes over these unnatural surfaces? Will roof and wall gardens be created to help with this?

What will be done to ensure that the lowest-paid workers at Micron receive a livable wage, allowing them to afford housing, food, transportation, healthcare, adequate leisure?

Wetlands are an important part of CNY's ecosystem. How will Micron work to prevent their industry from damaging the natural assets that has made this area desirable to those who live here?

What will be done to mitigate the noise and light pollution that will drive off wildlife?

How long will the negative effects of this project be monitored, so that unexpected consequences will come to light, and is there a fund from which to mitigate any unexpected damages discovered as time goes on?

Our lakes and reservoirs are an important part of this area. Agricultural and residential lawns create runoff that is toxic to lakes, creating effects such as algae blooms. What protections will be in place to protect the wildlife, safety and beauty of our lakes? What funding will be available to mitigate any unanticipated damage to those ecosystems?

Why has the Micron project been developed with a wetland replacement ration of 2:1, while other development projects have been kept to a ration of 10-15:1?

Clay already has flooding issues in my area. Flood risks are predicted to increase with this project. Why is Micron not being specific in detailing their plans for stormwater runoff and wastewater discharge management, or their plans for mitigating downstream flooding?

The proposed wetland restoration sites seem inadequate in acreage, and are not downstream of their buildings, so where will all this water go??

What protections for the native bat species are there? We already suffer from too many mosquitos, with occasional outbreaks of the diseases they carry, and any danger to the local population of bats that prey on mosquitos will likely have a very negative effect on all the people who live nearby and their enjoyment of their property.

Thank you for your attention to these matters.

Heidi Escobar

Heidi Escobar

heidiescobar1@gmail.com

4194 Pisces C., 4194 pisces cir

Liverpool, New York 13090

Archived: Thursday, October 16, 2025 9:03:55 AM

From: [Devin Burgess](#)

Mail received time: Mon, 11 Aug 2025 15:24:01

Sent: Monday, August 11, 2025 11:24:02 AM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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The wetlands and lakes in the greater Syracuse area are a crucial part of the natural ecosystem. As a resident of the area I am greatly concerned by the threat to natural bodies of water that Micron poses, and not only to the quality of our water sources but the impact it will have on the local wildlife and the greater health of the residents who live here. We have already seen the impacts that factories like these have created in air quality, water quality, and toxins released. These impacts correlate to rises in cancer, asthma, and other harmful diseases in the local communities.

At a time when decreasing the country's carbon footprint is crucial it seems absolutely ludicrous to demolish acres of natural and mature wetlands to build Micron's factory. These wetlands are a huge carbon sink and disturbing them does not only cause the possibility of the wetlands releasing their carbon stores but also take away any possibility of these natural environments continuing to store carbon. No amount of wetland conservation that Micron proposes to do can make up for demolishing acres of mature wetland.

While undoubtedly Micron presents an economic opportunity for the area, the community health and environmental impacts are to great a cost for our communities to pay.

Thank you for your consideration of my comments.

Sincerely,
Devin Burgess

Devin Burgess
dlmburgess@gmail.com
2635 Warner Heights Rd
Canastota, New York 13032

Archived: Thursday, October 16, 2025 9:30:51 AM

From: [Heidi Escobar](#)

Mail received time: Mon, 11 Aug 2025 16:19:52

Sent: Monday, August 11, 2025 12:19:53 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Here are some further comments on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York.

Please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. Please extend the comment period to October 25, 2025, at a minimum.

Please address your attention, and respond to the following issues and concerns:

What support for research into the human neurodevelopmental effects of PFA's in our environment will Micro provide, give that PFA's are created as a result of the manufacture of semiconductors? There is already research that shows that PFS's are associated with the increase of ADHD and other neurodevelopment issues we've seen increase in recent decades. This is such a huge problem and I would rather see the community err on the side of caution, than experiment on the babies and children in the area, or on the Micron workers, some of whom will undoubtedly be working while pregnant. What are your comments?

Research into the damaging effects on neurodevelopment amongst children, and other health effects, of PFAs continually being dumped into the environment and therefore increasing their presence in humans, plants and other life, must NOT be suppressed, (as research about tobacco & greenhouse gases, have, for examples), and all possible mitigation efforts should be undertaken at MICRON's expense. What transparency will be supported by MICRON regarding research into effects of PFA's in the environment by various Govt and NGO Scientific organizations? What commitment to help for affected individuals will be made?

What measures will be taken to reduce the greenhouse gas emissions predicted to be the result of Micron operations? Are the renewable energy credits available to actually make up for the damaging emissions predicted from the Micron project? Humans are already DYING because industries like oil and gas have worked hard to discredit climate scientists, who have predicted human caused climate change since the 1950s. We must NOT continue spewing greenhouse gases into the environment.

What support for increasing nuclear power generation, and for research into nuclear power safety improvements will be endorsed or provided by Micron?

Will workers be part of any committees designed to promote worker safety?

How will workers' children be protected in the event of a spill event reaching the proposed worker childcare center?

How will our community be protected from the sludge created as part of the initial construction and continuing manufacturing processes? What funds will be allocated to finding more effective wastewater treatment processes?

Heidi Escobar

heidiescobar1@gmail.com

4194 Pisces C., 4194 pisces cir

Liverpool, New York 13090

Archived: Thursday, October 16, 2025 9:35:28 AM

From: [David Friedman](#)

Mail received time: Mon, 11 Aug 2025 16:55:04

Sent: Monday, August 11, 2025 12:55:05 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York.

I urge consideration and response to the following issues and concerns:

Micron will be using a host of chemicals - many of them toxic, like PFAS - in the manufacturing process. Yet it has not released the names of these chemicals. Why? The DEIS mentions several possible treatment technologies to remove PFAS from wastewater but does not, and cannot, guarantee their complete removal. It is therefore almost certain that PFAS will be released into waterways, soil and air; and through these avenues, incorporated into our bodies. The effects of PFAS are just beginning to be understood. It seems that once again an industry wants to play now and let people pay later.

Thank you for your consideration of my comments.

Sincerely,

David Friedman
Fayetteville, NY

David Friedman
duvbab@aol.com
100 Margo Lane
Fayetteville, New York 13066

Archived: Thursday, October 16, 2025 10:48:32 AM

From: [Vanessa Rojas](#)

Mail received time: Mon, 11 Aug 2025 17:00:40

Sent: Monday, August 11, 2025 1:00:41 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York.

I spent many hours reviewing Micron's DEIS, paying particular attention to the impacts to bats including federally endangered bat species. I have been studying bat species for nearly 15 years, including Indiana and northern-long eared bats. With such a limited amount of time to review this 20,000 page document, it is not feasible for me to provide an in-depth review, summary and response to all of the proposed impacts to bats with the Micron site development, so I will highlight just a few points. Please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same.

APPENDIX G

G-3.4.1 Mammals

- Table G-2 Mammal Species (Proposed Project)

- o It is difficult to identify what is meant to be bold (actually observed) or not (potential to occur), some of the text is just partially bold (e.g., long-eared bat of Northern long-eared bat).

- o Indiana and Northern long-eared bats were both noted to have been detected with "a significant level of confidence" at multiple locations, yet only the Northern long-eared bat is in partial bold in the table.

- o White-tailed deer are not bold? How do you do surveys and not find any evidence of white-tailed deer?

G-3.5.1

- "The Micron Campus site and the Rail Spur Site are within 1 mile of a known Indiana bat maternity roost, within 3 miles of other known Indiana bat roost trees and capture locations, and within 14 miles of a known hibernaculum." (pdf page 63)

- o The presence of federally endangered Indiana bats were documented at 6 survey site locations (2, 4, 7, 10, 11, and 16).

Indiana bats are a federally protected species in decline due to habitat loss, disturbance, and

white-nose syndrome (WNS). Impacts to Indiana bats from WNS have reached nearly 100% declines in surveys. And yet, this project proposes to disregard creating additional negative impacts to the bat populations in New York. Similar impacts (the steepest of all *Myotis* species) are also shown for the federally endangered northern-long eared bat, which are also noted to be present at the proposed development site.

5.2.1 Background on Noise Sensitivity in Bats

- Although the authors do note that research is limited in this area related to the species of concern, it is important to note that their references are from different regions. It is better than no references and this information should be considered but it should be more clear that one is related to European *Myotis* and another in California. (pdf page 157)

- o This paper should also be considered in this assessment related to noise impacts:

- o ?X Li, Han, Chase Crihfield, Yashi Feng, Gabriella Gaje, Elissa Guzman, Talia Heckman, Anna Mellis, Lauren Moore, Nayma Romo Bechara, Sydney Sanchez, and et al. 2020. "The Weekend Effect on Urban Bat Activity Suggests Fine Scale Human-Induced Bat Movements" *Animals* 10, no. 9: 1636. <https://doi.org/10.3390/ani10091636>

- Even though the little brown bat is in the same genus (*Myotis* species) as the Indiana and northern long-eared bats, the impact of noise and other development to the little brown bat should not be compared to that of the federally endangered species. Little brown bats are known to be more tolerant of using anthropogenic resources and more generalist compared to Indiana and northern long-eared bats. (pdf page 157).

- o See additional references:

- o ?X Bergeson, S.M., Carter, T.C. and Whitby, M.D. 2015. Adaptive roosting gives little brown bats an advantage over endangered Indiana bats. *The American Midland Naturalist*, 174(2), pp.321-330. <https://doi.org/10.1674/0003-0031-174.2.321>

- o ?X Bergeson, S.M., Holmes, J.B. & O'Keefe, J.M. 2020. Indiana bat roosting behavior differs between urban and rural landscapes. *Urban Ecosyst* 23, 79–91. <https://doi.org/10.1007/s11252-019-00903-4>

8. Project Commitment and Mitigation Measures

- This section starts on pdf page 188.

- General comment: The mitigation measures of this project are reminiscent of those related to the Indiana bat and the Indianapolis Airport area mitigation measures. There has been more than a decade of research on this project that may be useful for improving the mitigation measures. There are too many to list here (one is already cited Divoll and O'Keefe 2018), but see additional work out of O'Keefe lab (<https://wildlife.nres.illinois.edu/publications/>) and the Center for Bat Research, Outreach, and Conservation.

- Roost fidelity is not considered even though it is an important factor for endangered bats. A couple of resources, but others are available as well:

- o Lewis, S.E., 1995. Roost fidelity of bats: a review. *Journal of Mammalogy*, 76(2), pp.481-496.

- o Gumbert, M.W., O'Keefe, J.M. and MacGregor, J.R., 2002. Roost fidelity in Kentucky. *The Indiana bat: biology and management of an endangered species* (A. Kurta and J. Kennedy, eds.). Bat Conservation International, Austin, Texas, pp.143-152.

- Artificial Roost Sites are listed as a mitigation measure. It is crucial to review the more recent research publications related to artificial roosts and Indiana bats. Here a few examples but also see additional resources from the O'Keefe lab (<https://wildlife.nres.illinois.edu/publications/>):

- o Crawford, R.D. and O'Keefe, J.M., 2021. Avoiding a conservation pitfall: Considering the risks

of unsuitably hot bat boxes. Conservation Science and Practice, 3(6), p.e412.

<https://doi.org/10.1111/csp2.412>

o Crawford, R.D. and O'Keefe, J.M., 2024. Improving the science and practice of using artificial roosts for bats. Conservation Biology, 38(1), p.e14170. <https://doi.org/10.1111/cobi.14170>

o Tillman, F.E., Bakken, G.S. and O'Keefe, J.M., 2021. Design modifications affect bat box temperatures and suitability as maternity habitat. Ecological Solutions and Evidence, 2(4), p.e12112. <https://doi.org/10.1002/2688-8319.12112>

- Project 2: Dispersal of bats from the Jamesville hibernaculum

- o This type of project will provide important data. However, for this to be done properly and to get the most amount of data from the disturbance to bats that this will cause, providing funding that also covers aerial telemetry, and many stationary antennae will likely improve the amount of data collected and results. I have seen presentations on similar work where researchers attempted to do this with northeastern hibernacula with limited success without aerial support. ?X Roby, P.L., Gumbert, M.W. and Lacki, M.J., 2019. Nine years of Indiana bat (*Myotis sodalis*) spring migration behavior. Journal of Mammalogy, 100(5), pp.1501-1511.

Appendix G-4 Draft Biological Assessment

- “Impacts to population size and viability from the loss of roosting and foraging habitat on the Micron Campus would therefore be possible through potential reductions in fecundity, adult survival, or both.” (pdf page 151)

- o Comment: Bats show roost fidelity (they will return to previous roosting sites), so it is likely that they will return to their previous maternity roosts where they likely had success. Having to find a new available roost, at this critical time of early spring emergence, that provides all of the resources needed to survive will be quite a risk and require a lot of energy. The proposed mitigation sites are miles away and it is unknown if these individuals are aware of these other locations that may or may not provide available suitable habitat.

Attachment 4: Bat mitigation sites (map; pdf page 560)

- There are 9 mitigation sites shown on the map, some of which are >10 miles away from the Micron site. I would like to know more about these sites, and will look for more details within the DEIS. From what I could find, these seem to be farm fields and will take many years to become suitable habitat. The DEIS makes it seem simple to just set aside some mitigation sites and assume the bats will use these and all will be fine. More time, research, effort, resources, and financial support should be put toward these mitigation efforts.

I also want to highlight a summary of other issues that have come to light with a group review of the DEIS. I urge consideration and response to the following issues and concerns:

- Water and Ecological Resources. The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.

- Protection of Air, Water, and Workers. The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.

- Greenhouse Gases: The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar –and without relying on renewable energy credits or using renewable energy that is already on the grid – to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

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- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,

Vanessa Rojas, PhD

Vanessa Rojas

vgrojas@esf.edu

257 Ranger School Rd.

Wanakena, New York 13695

Archived: Thursday, October 16, 2025 10:48:37 AM

From: [Elaine Sperbeck](#)

Mail received time: Mon, 11 Aug 2025 17:02:08

Sent: Monday, August 11, 2025 1:02:10 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Elaine Sperbeck
ejsperbeck@yahoo.com
618 E Monroe street
Little Falls, New York 13365

Archived: Thursday, October 16, 2025 10:48:43 AM

From: robertposch323@gmail.com

Mail received time: Mon, 11 Aug 2025 17:03:57

Sent: Monday, August 11, 2025 1:03:59 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

robertposch323@gmail.com

4681 Rt 23C

Jewett, New York 12444

Archived: Thursday, October 16, 2025 10:48:49 AM

From: sdutschke@gmail.com

Mail received time: Mon, 11 Aug 2025 17:04:16

Sent: Monday, August 11, 2025 1:04:17 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

sdutschke@gmail.com

4306 Darbrook Rd

Louisville, Kentucky 40207

Archived: Thursday, October 16, 2025 10:23:38 AM

From: [Meredith Kent-Berman](#)

Mail received time: Mon, 11 Aug 2025 17:04:28

Sent: Monday, August 11, 2025 1:04:29 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
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Thank you for your consideration of my comments.

Sincerely,

Meredith Kent-Berman
mkent@health.nyc.gov
235 East 22nd Street, Apt# 12E
New York City, USA, New York 10010

Archived: Thursday, October 16, 2025 10:48:54 AM

From: [Jill Nicholas](#)

Mail received time: Mon, 11 Aug 2025 17:04:41

Sent: Monday, August 11, 2025 1:04:42 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Jill Nicholas
jlnicholas@rochester.rr.com
45 Oak Hill Terrace
Penfield, New York 14526

Archived: Thursday, October 16, 2025 10:48:58 AM

From: masewald@yahoo.com

Mail received time: Mon, 11 Aug 2025 17:05:00

Sent: Monday, August 11, 2025 1:05:01 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

masewald@yahoo.com
1401 Wewatta St
Denver, Colorado 80202

Archived: Thursday, October 16, 2025 10:49:03 AM

From: pamylle1@gmail.com

Mail received time: Mon, 11 Aug 2025 17:05:04

Sent: Monday, August 11, 2025 1:05:05 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

pamylle1@gmail.com

P.O. Box 456

Peconic, New York 11958

Archived: Thursday, October 16, 2025 10:49:08 AM

From: [Robert Lombardi](#)

Mail received time: Mon, 11 Aug 2025 17:05:07

Sent: Monday, August 11, 2025 1:05:09 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Robert Lombardi
bob532@aol.com
1465 E 64th St
Brooklyn, New York 11234

Archived: Thursday, October 16, 2025 10:28:05 AM

From: laurel2000@gmail.com

Mail received time: Mon, 11 Aug 2025 17:05:15

Sent: Monday, August 11, 2025 1:05:16 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

laurel2000@gmail.com
106 N 6th Ave
Highland Park, New Jersey 08904

Archived: Friday, October 10, 2025 4:43:43 PM

From: jezebelfilms@gmail.com

Mail received time: Mon, 11 Aug 2025 17:05:31

Sent: Monday, August 11, 2025 1:05:32 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

jezebelfilms@gmail.com
66 E HILL RD
AUSTERLITZ, New York 12017

Archived: Thursday, October 16, 2025 10:49:13 AM

From: [Taylor Smith](#)

Mail received time: Mon, 11 Aug 2025 17:07:18

Sent: Monday, August 11, 2025 1:07:19 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Sincerely,
Taylor M. Smith

Taylor Smith
taylorsmith1051@gmail.com
6424 Green Ridge Ave
New Carlisle , Ohio 45344

Archived: Thursday, October 16, 2025 10:49:18 AM

From: [Steven M Rosenberg](#)

Mail received time: Mon, 11 Aug 2025 17:07:50

Sent: Monday, August 11, 2025 1:07:52 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Sincerely,

Steven M Rosenberg
sunydays33304@gmail.com
2424 Parkview Drive 10P, 10P
San Angelo, Texas 76904

Archived: Thursday, October 16, 2025 10:15:58 AM

From: [Caroline Jimenez](#)

Mail received time: Mon, 11 Aug 2025 17:07:55

Sent: Monday, August 11, 2025 1:07:56 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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CHIPS Program Office,

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Sincerely,

Caroline Jimenez
projectcaroline.jimenez@gmail.com
305 Old Country Rd
Elmsford, New York 10523

Archived: Thursday, October 16, 2025 10:49:22 AM

From: shelbyherman1@gmail.com

Mail received time: Mon, 11 Aug 2025 17:08:14

Sent: Monday, August 11, 2025 1:08:15 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

shelbyherman1@gmail.com
114 E 122nd St
New York, New York 10035

Archived: Thursday, October 16, 2025 9:27:26 AM

From: elizbeutler@gmail.com

Mail received time: Mon, 11 Aug 2025 17:08:29

Sent: Monday, August 11, 2025 1:08:30 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
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Sincerely,

elizbeutler@gmail.com
81 Cypress Street
Rochester , New York 14620

Archived: Thursday, October 16, 2025 10:49:27 AM

From: timj@nirs.org

Mail received time: Mon, 11 Aug 2025 17:09:14

Sent: Monday, August 11, 2025 1:09:15 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
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Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
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Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

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Thank you for your consideration of my comments.

Sincerely,

timj@nirs.org

103 Rugby Road

Syracuse, New York 13206

Archived: Thursday, October 16, 2025 9:09:15 AM

From: cbrexel@aol.com

Mail received time: Mon, 11 Aug 2025 17:09:19

Sent: Monday, August 11, 2025 1:09:20 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

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Thank you for your consideration of my comments.

Sincerely,

cbrexel@aol.com

623 Harbor Creek Pkwy

Canton, Georgia 30115

Archived: Thursday, October 16, 2025 9:37:26 AM

From: gilmores@ccsu.edu

Mail received time: Mon, 11 Aug 2025 17:09:53

Sent: Monday, August 11, 2025 1:09:54 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

gilmores@ccsu.edu

19 Auburn Rd

West Hartford, Connecticut 06119

Archived: Thursday, October 16, 2025 9:02:12 AM

From: brightroad2015@gmail.com

Mail received time: Mon, 11 Aug 2025 17:10:32

Sent: Monday, August 11, 2025 1:10:34 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

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Thank you for your consideration of my comments.

Sincerely,

brightroad2015@gmail.com
1150 grand concourse
bronx, New York 10456

Archived: Thursday, October 16, 2025 10:49:32 AM

From: sadie8882@gmail.com

Mail received time: Mon, 11 Aug 2025 17:11:49

Sent: Monday, August 11, 2025 1:11:51 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
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Thank you for your consideration of my comments.

Sincerely,

sadie8882@gmail.com
800 Trenton Rd., Apt. 465
Langhorne, Pennsylvania 19047

Archived: Thursday, October 16, 2025 11:44:48 AM

From: [Rebecca Rolnick](#)

Mail received time: Mon, 11 Aug 2025 17:12:58

Sent: Monday, August 11, 2025 1:12:59 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Statement for Micron's proposed semiconductor manufacturing facility in Clay, NY. I grew up in the Syracuse area, went to SUNY-ESF for college, and currently live and work in the area.

I am writing to say that the draft does NOT adequately address the ways this project will impact the environment and my local community. The DEIS also needs to contain more robust plans for how Micron will mitigate these impacts.

These are some of my concerns, along with suggestions for the final draft of the EIS:

Time for public comment: The DEIS is 20,000 pages and is highly technical. The public has only had 45 days to read and respond to this document. I am asking you to extend the public comment period to October 25, 2025 at a minimum. There was a petition to extend the deadline that over 1500 residents signed (including me!) and there has been no response to that petition. As citizens, we need time to thoroughly understand the issues and have a chance to voice our concerns, especially given the massive scope of this project and the long-term effects it will have on all of us.

Micron could choose a different site that has already undergone industrial development, rather than a healthy undisturbed area of wetland, grassland, and forest.

Micron could be required to justify why they need 4 Fabs here when they have had recent proposals to build additional facilities in other places. They could make 3 fabrication facilities rather than 4, which would reduce the impacts of the project.

The DEIS does not acknowledge the fact that the area where they plan to build has Karst bedrock. Karst bedrock slowly dissolves with water, so stress on the area could create fractures that eventually lead to sinkholes. Also, even if they use the best precautions, a facility like this will almost inevitably have some amount of chemical spills at some point. The gaps in the rock mean that groundwater contamination would spread quickly to other areas farther away from the fab.

Micron has not specified where they will bring the toxic waste created in production, although one possibility is Middlesex, NJ. The DEIS should evaluate the impacts that the hazardous waste will have on the community where it ends up. Middlesex is ALREADY considered an

“Overburdened Community” that experiences disproportionate environmental and human health stressors, and this isn’t going to help them.

There should be a partnership of scientists, engineers, and citizens to monitor the progress of the project and its environmental impacts and keep Micron accountable, similar to the Community Participation Working Group created for the Onondaga Lake cleanup. They should release a report to the public every couple of years, like the State of the Lake reports.

There are new NYS wetland regulations as of January 1, 2025. The DEIS does not indicate whether Micron plans to adhere to these regulations.

They should be more specific about their plans for de-watering the area and how long they plan to do that. The DEIS says that no one in the area is on wells, but there ARE people who use well water in the vicinity. They should conduct a more robust survey to assess the impacts of the ways that lowering the water table will affect local wetlands and well-water users.

Micron has said that the project will create good jobs for the community. But the DEIS does not specify the salaries of specific positions. In similar facilities in the industry, the engineers and managers make over \$100,000, but the production workers only make about \$40,000 and they are constantly exposed to dangerous chemicals. When I flipped through binders containing the 20,000 pages of the DEIS, I happened to see a page that said that workers will be required to work no more than 60 hours per week and will be required to have one day off per every seven days. This is not what I want for the people in my community! When Micron makes a Worker Safety Committee, it should be worker-led. There should also be ways for workers to voice safety concerns without fear of retaliation.

Micron should be required to disclose the types of PFAS chemicals they will be discharging into our water. I am very concerned about how these will flow into Lake Ontario only two miles away from the source of Syracuse drinking water!

Birds: The DEIS fails to consider use of the site for bird migration stopover habitat. Places to rest and refuel are vital for birds during their journeys. This is something they should assess.

Short-eared Owls live on the site, and they are a Species of Greatest Conservation Concern in NYS. I have been an avid birder for over a decade, and I personally still haven’t seen one because of how rare they are. I would be so excited to get to see one, but if we destroy their important habitat I may never have the chance.

They describe mitigation strategies for grassland birds, but they should also create strategies for ALL the birds, since the site is a mix of grassland, forest, and especially most of all wetlands. But they do not address how they will mitigate impacts to wetland birds.

The bat research they used as evidence is based on different species with different behavior, which are more tolerant of human disturbance. The Indiana and Long-eared Bats found on the site are endangered species whose populations have already declined almost 100% in NYS, which means this particular location is vital for the future success of this species. The DEIS needs to consider the fact that this site has a maternity roost, where bats return to the same place year after year, and whether the bats would realistically be able to use the mitigation sites they have set aside for them.

Air quality monitoring needs to take place close by, not all the way in Rochester. I am very concerned about how this facility will affect our air quality, especially as I am someone with Cystic Fibrosis who has more sensitive lungs than the average person.

Similar development projects have had a wetland remediation ratio of 10 or 15:1. Micron only plans to restore wetland in a 2:1 ratio. And the sites they pick are fragmented, not continuous, which means they will not provide suitable habitat for species that require a large area. Since these sites are currently in soybean production, it will be decades before they provide a mature wetland habitat, IF ever.

The DEIS needs to say more about how it will mitigate flooding to the town of Clay. Clay already experiences flooding. If they remove the 200 acres of wetlands that provide flood protection and replace them with concrete, what will stop the local towns from getting overtaken by water? The areas they have chosen for wetland remediation are not in the right locations to help with this.

These concerns are all based on my current understanding of the DEIS. However, since it is 20,000 pages, I would love to have time to read more of it.

Thank you for reading and considering my comment.

Sincerely,

Rebecca Rolnick
SUNY-ESF, B.S. Conservation Biology 2019

Rebecca Rolnick
hello@rebeccarolnick.com
209 Cashin Drive
Fayetteville, New York 13066

Archived: Thursday, October 16, 2025 9:21:54 AM

From: [CATHY CRONIN](#)

Mail received time: Mon, 11 Aug 2025 17:13:20

Sent: Monday, August 11, 2025 1:13:21 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
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Thank you for your consideration of my comments.

Sincerely,

CATHY CRONIN

cathymecronin@gmail.com

169 Centre St N

Schenectady, New York 12345

Archived: Thursday, October 16, 2025 11:02:44 AM

From: willowparchment@gmail.com

Mail received time: Mon, 11 Aug 2025 17:13:52

Sent: Monday, August 11, 2025 1:13:53 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

willowparchment@gmail.com
208 W 140th st
New York, New York 10030

Archived: Thursday, October 16, 2025 11:02:40 AM

From: [Wendy Yost](#)

Mail received time: Mon, 11 Aug 2025 17:14:14

Sent: Monday, August 11, 2025 1:14:16 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office CHIPs Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Micron says it will form Workplace Safety Committees as a requirement of New York labor law. They will use the National Institute for Occupational Safety and Health (NIOSH) Hierarchy of Controls as guidance.

Micron does not provide the chemical exposure limits to the public and does not commit to doing so. Micron does not disclose the human health risks for working with the chemicals they use.

Micron does not commit to making these chemical exposure limits enforceable.

Micron does not indicate if the Worker Safety committee will be worker-led.

Specific answers to these questions should be provided along with an complete list of the the dangerous chemicals that will be used.

Wendy Yost

wyost@verizon.net

822 Glenwood Avenue

Syracuse, New York 13207

Archived: Thursday, October 16, 2025 9:27:05 AM

From: ebanks@daemen.edu

Mail received time: Mon, 11 Aug 2025 17:14:56

Sent: Monday, August 11, 2025 1:14:57 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

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- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
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Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,

ebanks@daemen.edu
19 Nottingham Circle
Peekskill, New York 10566

Archived: Thursday, October 16, 2025 10:27:19 AM

From: [Jason Kulczyk](#)

Mail received time: Mon, 11 Aug 2025 17:15:54

Sent: Monday, August 11, 2025 1:15:55 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report.

I grew up in Clay, and do not want to see the entire area and ecosystem destroyed just so that Donald Trump can claim credit and look good. This is a scam.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
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Thank you for your consideration of my comments.

Sincerely,

Jason Kulczyk
jkulczyk@fwwatch.org
28 Bay Shore Avenue
Bay Shore, New York 11706

Archived: Thursday, October 16, 2025 9:18:24 AM

From: claw4@comcast.net

Mail received time: Mon, 11 Aug 2025 17:17:53

Sent: Monday, August 11, 2025 1:17:53 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

claw4@comcast.net
7409 N. Claremont
Chicago, Illinois 60645

Archived: Thursday, October 16, 2025 11:02:35 AM

From: [TIA TRIPLETT](#)

Mail received time: Mon, 11 Aug 2025 17:18:48

Sent: Monday, August 11, 2025 1:18:49 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

TIA TRIPLETT

tia@anlf.com

3959 Berryman Avenue

Los Angeles, California 90066

Archived: Thursday, October 16, 2025 9:07:14 AM

From: alexis.cameron@gmail.com

Mail received time: Mon, 11 Aug 2025 17:18:57

Sent: Monday, August 11, 2025 1:18:59 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

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Thank you for your consideration of my comments.

Sincerely,

alexis.cameron@gmail.com

13 Oak Rd

Delmar, New York 12054

Archived: Thursday, October 16, 2025 11:02:31 AM

From: nancystamm@edc-inc.com

Mail received time: Mon, 11 Aug 2025 17:20:42

Sent: Monday, August 11, 2025 1:20:43 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

nancystamm@edc-inc.com

nancystamm@edc-inc.com

Fort Pierce, Florida 34945

Archived: Thursday, October 16, 2025 9:14:57 AM

From: ceskyrm@gmail.com

Mail received time: Mon, 11 Aug 2025 17:21:39

Sent: Monday, August 11, 2025 1:21:40 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

ceskyrm@gmail.com

305 W 98th Street, Apt 4FS

NEW YORK, New York 10025-5528

Archived: Thursday, October 16, 2025 11:02:23 AM

From: [Alyson Shotz](#)

Mail received time: Mon, 11 Aug 2025 17:21:50

Sent: Monday, August 11, 2025 1:21:51 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Alyson Shotz
theobabka@gmail.com
63 Flushing Ave
Brooklyn, New York 11205

Archived: Thursday, October 16, 2025 11:02:18 AM

From: hwendel@heidwendellaw.com

Mail received time: Mon, 11 Aug 2025 17:23:19

Sent: Monday, August 11, 2025 1:23:20 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Hello, my name is Heidi Wendel and I am a resident of Cold Spring, in the Hudson Valley, NY.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

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Thank you for your consideration of my comments.

Sincerely,

hwendel@heidiwendellaw.com

29 Secor Street

Cold Spring, New York 10516

Archived: Thursday, October 16, 2025 9:36:00 AM

From: gb191919gb@gmail.com

Mail received time: Mon, 11 Aug 2025 17:24:11

Sent: Monday, August 11, 2025 1:24:12 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
- **Greenhouse Gases:** The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar –and without relying on renewable energy credits or using renewable energy that is already on the grid – to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,

gb191919gb@gmail.com

49 Flanders Bartley Road

Flanders, New Jersey 07836-4735

Archived: Thursday, October 16, 2025 11:02:14 AM

From: victoriatheaterarts@gmail.com

Mail received time: Mon, 11 Aug 2025 17:24:17

Sent: Monday, August 11, 2025 1:24:18 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPs Program Office,

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I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
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Thank you for your consideration of my comments.

Sincerely,

victoriatheaterarts@gmail.com

16 Washington Street

Nyack, New York 10960

Archived: Thursday, October 16, 2025 11:02:09 AM

From: shelleyabbate56@gmail.com

Mail received time: Mon, 11 Aug 2025 17:26:08

Sent: Monday, August 11, 2025 1:26:09 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

shelleyabbate56@gmail.com
2630 Parkside Drive
Union City, California 94587

Archived: Thursday, October 16, 2025 9:36:25 AM

From: [Ken Gibb](#)

Mail received time: Mon, 11 Aug 2025 17:27:36

Sent: Monday, August 11, 2025 1:27:37 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Ken Gibb

kengibb@gmail.com

PO Box 11616

Zephyr Cove, Nevada 89448

Archived: Thursday, October 16, 2025 11:02:04 AM

From: [Eric Pash](#)

Mail received time: Mon, 11 Aug 2025 17:28:19

Sent: Monday, August 11, 2025 1:28:20 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Eric Pash

epash@diamondpharmacy.com

373 Degaetano Road Indiana, PA 15701

Indiana, Pennsylvania 15701

Archived: Thursday, October 16, 2025 11:01:56 AM

From: [Sonia Romero Villanueva](#)

Mail received time: Mon, 11 Aug 2025 17:28:43

Sent: Monday, August 11, 2025 1:28:45 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Sonia Romero Villanueva
pupycom123@yahoo.es
Avinguda Corts Catalanes, 530
Sant Adrián del Besos, Catalunya 08930

Archived: Thursday, October 16, 2025 11:04:39 AM

From: mjkentberman@gmail.com

Mail received time: Mon, 11 Aug 2025 17:31:08

Sent: Monday, August 11, 2025 1:31:09 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

mjkentberman@gmail.com
235 East 22nd Street, Apt# 12E
New York, New York 10010

Archived: Thursday, October 16, 2025 9:36:50 AM

From: info@saltcityharvest.farm

Mail received time: Mon, 11 Aug 2025 17:32:20

Sent: Monday, August 11, 2025 1:32:21 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Jacob Gigler-Caro

info@saltcityharvest.farm
7235 Manlius Center Road
East Syracuse, New York 13057

Archived: Thursday, October 16, 2025 10:10:48 AM

From: jemaralo10@gmail.com

Mail received time: Mon, 11 Aug 2025 17:33:15

Sent: Monday, August 11, 2025 1:33:16 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

jemaralo10@gmail.com
4126 Loma Riviera Ln, 6
San Diego, California 92110

Archived: Thursday, October 16, 2025 8:47:10 AM

From: atrigross@gmail.com

Mail received time: Mon, 11 Aug 2025 17:34:55

Sent: Monday, August 11, 2025 1:34:56 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
- **Greenhouse Gases:** The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar –and without relying on renewable energy credits or using renewable energy that is already on the grid – to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

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Thank you for your consideration of my comments.

Sincerely,

atrigross@gmail.com

50 1st pl

Brooklyn , New York 11231

Archived: Thursday, October 16, 2025 9:26:39 AM

From: eam1220@gmail.com

Mail received time: Mon, 11 Aug 2025 17:34:55

Sent: Monday, August 11, 2025 1:34:57 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

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Thank you for your consideration of my comments.

Sincerely,

eam1220@gmail.com
13173 King's Hwy
King George, Virginia 22485

Archived: Thursday, October 16, 2025 8:48:46 AM

From: [Soraya Barabi](#)

Mail received time: Mon, 11 Aug 2025 17:36:16

Sent: Monday, August 11, 2025 1:36:17 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Soraya Barabi
musiclover2478@yahoo.com
1240 Brockton Ave
Los Angeles, California 90025

Archived: Thursday, October 16, 2025 11:04:35 AM

From: [Jamie Shields](#)

Mail received time: Mon, 11 Aug 2025 17:37:01

Sent: Monday, August 11, 2025 1:37:02 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

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Thank you for your consideration of my comments.

Sincerely,

Jamie Shields
jfillmore66@gmail.com
523 E. 2nd Street
Rainier, Oregon 97048

Archived: Thursday, October 16, 2025 9:00:49 AM

From: [Patrick BOOT](#)

Mail received time: Mon, 11 Aug 2025 17:38:01

Sent: Monday, August 11, 2025 1:38:02 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

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Thank you for your consideration of my comments.

Sincerely,

Patrick BOOT

psi-wines@wanadoo.fr

320 Avenue du Père Prévost

Montpellier, Occitanie 34090

Archived: Thursday, October 16, 2025 9:25:08 AM

From: dvdlr6314@gmail.com

Mail received time: Mon, 11 Aug 2025 17:38:04

Sent: Monday, August 11, 2025 1:38:05 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

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Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

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Thank you for your consideration of my comments.

Sincerely,

dvdlr6314@gmail.com
1746 Ocean Avenue
Brooklyn, New York 11230

Archived: Thursday, October 16, 2025 9:17:29 AM

From: [Paul Ciavarrì](#)

Mail received time: Mon, 11 Aug 2025 17:38:23

Sent: Monday, August 11, 2025 1:38:24 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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I urge consideration and response to the following issues and concerns:

- Water and Ecological Resources.

The DEIS appears to be far too optimistic about the effects of wetland / grassland destruction upon grassland breeding birds.

The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS notes that "vegetation conditions... are transitioning from old field to early successional, woody habitat at many survey points." Since this transition is not matured, and since wetlands combined with grasslands are far better for grassland bird breeding, Micron's "replacement" of mature wetlands with still-developing grasslands and/or newly developing wetlands (which can take scores, if not a hundred or more, of years to develop) is inadequately developed and should be much improved. At least a 10-to-1 acre-to-acre replacement of destroyed wetlands with grassland and wetlands-in-development should be required.

The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds).

Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.

- Protection of Air, Lake Ontario Water, and Workers. The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production.

Especially concerning is the strong likelihood of additional contamination of Lake Ontario water by PFAS, PFOA, and additional other per- and polyfluoroalkyl "forever chemicals." Micron should be required to provide significant funding (in the millions of dollars) to finance additional water purification methods for all surrounding counties (Oswego, Onondaga, Wayne, Jefferson, Cayuga, Monroe, Orleans, Niagara, etc.), including investment in methods that (1) detect PFAS/PFOA and related chemicals at the lowest detectable levels and (2) remove these chemicals from the water supply.

Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.

Further, EPA method 1633 is inadequate in the detection of more than 40 PFAS chemicals in soil, water, and biological tissue. Micron should be subject to a broader spectrum testing procedure that can identify scores more PFAS compounds than EPA method 1633, especially since the semiconductor industry reportedly utilizes hundreds, if not thousands of PFAS compounds.

- Greenhouse Gases: The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar, without relying on renewable energy credits or using renewable energy that is already on the grid, to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

Micron should be required to place solar panels on the roof of every building to assist in powering its daily industrial operation, and to reduce reliance on greenhouse gas output, as well as its probable reliance upon nuclear energy, which produces toxic radioactive waste that is unsafe for hundreds, if not thousands, of years.

Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project.

The DEIS should require a study of the affordability of energy and clean water resources upon residents in a 50 mile radius in relation to its expected water demands.

- Job Access, Housing & Transportation.

Micron will be situated in Onondaga County, which contains highly distressed, environmental justice communities. One of most significant pressures upon these communities is the quality, affordability, and availability of decent housing for members of these communities. The DEIS should address how Micron will work with state and county governments to expand the

availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,
Paul Ciavarri

Paul Ciavarri
pciavarri@lscny.org
6 Gregory Parkway
Syracuse, New York 13214

Archived: Thursday, October 16, 2025 11:04:30 AM

From: [Steven Vogel](#)

Mail received time: Mon, 11 Aug 2025 17:38:41

Sent: Monday, August 11, 2025 1:38:42 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

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Thank you for your consideration of my comments.

Sincerely,

Steven Vogel
steven.j.vogel@earthlink.net
449 Hampton Ct
Falls Church, Virginia 22046-4121

Archived: Thursday, October 16, 2025 11:04:25 AM

From: snweiner@gmail.com

Mail received time: Mon, 11 Aug 2025 17:40:20

Sent: Monday, August 11, 2025 1:40:21 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

snweiner@gmail.com
20 East 9th Street, APT 14W
New York, New York 10003

Archived: Thursday, October 16, 2025 9:44:13 AM

From: [Ron Graner](#)

Mail received time: Mon, 11 Aug 2025 17:40:30

Sent: Monday, August 11, 2025 1:40:31 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
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Thank you for your consideration of my comments.

Sincerely,
Ron Graner

Ron Graner
ronfgraner@gmail.com
19 Gazebo Path
Fayetteville, New York 13066

Archived: Thursday, October 16, 2025 10:18:50 AM

From: K5Lund@gmail.com

Mail received time: Mon, 11 Aug 2025 17:40:38

Sent: Monday, August 11, 2025 1:40:39 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

K5Lund@gmail.com

414 Lynn Street

Staten Island, New York 10306

Archived: Thursday, October 16, 2025 11:04:20 AM

From: [Eric Walker](#)

Mail received time: Mon, 11 Aug 2025 17:41:18

Sent: Monday, August 11, 2025 1:41:19 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

Eric Walker
eric.walker@weact.org
296 Jersey
Buffalo , New York 14201

Archived: Thursday, October 16, 2025 11:04:15 AM

From: stlee1975@yahoo.com

Mail received time: Mon, 11 Aug 2025 17:42:02

Sent: Monday, August 11, 2025 1:42:03 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

stlee1975@yahoo.com
5 Nob Hill Road
New City, New York 10956-1916

Archived: Thursday, October 16, 2025 9:46:11 AM

From: [Cory Hall](#)

Mail received time: Mon, 11 Aug 2025 17:42:20

Sent: Monday, August 11, 2025 1:42:22 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Sincerely,

Cory Hall

coryrose84@aol.com

94 Old Coach Rd

Clifton Park, New York 12065

Archived: Thursday, October 16, 2025 11:04:11 AM

From: phyllis2723@gmail.com

Mail received time: Mon, 11 Aug 2025 17:42:53

Sent: Monday, August 11, 2025 1:42:54 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

phyllis2723@gmail.com

1209 W. Wynnewood Rd.

Wynnewood , Pennsylvania 19096

Archived: Thursday, October 16, 2025 8:48:20 AM

From: baballenger1@gmail.com

Mail received time: Mon, 11 Aug 2025 17:43:55

Sent: Monday, August 11, 2025 1:43:56 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Sincerely,

baballenger1@gmail.com
336 Los Padres Dr
Thousand Oaks, California 91361

Archived: Thursday, October 16, 2025 11:04:06 AM

From: myoung@syrr.gov

Mail received time: Mon, 11 Aug 2025 17:44:05

Sent: Monday, August 11, 2025 1:44:05 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

myoung@syr.gov

451 Columbus Ave

Syracuse, New York 13210

Archived: Thursday, October 16, 2025 10:02:18 AM

From: [Mark Hollinrake](#)

Mail received time: Mon, 11 Aug 2025 17:46:40

Sent: Monday, August 11, 2025 1:46:41 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
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Thank you for your consideration of my comments.

Sincerely,

Mark Hollinrake
markhollinrake1993@gmail.com
35 Morningside Av
New York , New York 10026

Archived: Thursday, October 16, 2025 11:04:01 AM

From: [Gregory Spock](#)

Mail received time: Mon, 11 Aug 2025 17:46:55

Sent: Monday, August 11, 2025 1:46:56 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Gregory Spock
gregorymspock@gmail.com
24 Fraser Street
Village Of Pelham, New York 10803

Archived: Thursday, October 16, 2025 11:03:56 AM

From: joann.mcgreevy@nyu.edu

Mail received time: Mon, 11 Aug 2025 17:47:33

Sent: Monday, August 11, 2025 1:47:35 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Sincerely,

joann.mcgreevy@nyu.edu
140 Prospect Ave Apt. 11A
HACKENSACK, New Jersey 07601-2249

Archived: Thursday, October 16, 2025 11:03:52 AM

From: mkenyon@alumni.albany.edu

Mail received time: Mon, 11 Aug 2025 17:48:35

Sent: Monday, August 11, 2025 1:48:36 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

mkenyon@alumni.albany.edu
30 Karner rd unit 14821
Albany, New York 12288

Archived: Thursday, October 16, 2025 10:17:13 AM

From: jimkeen48@icloud.com

Mail received time: Mon, 11 Aug 2025 17:49:57

Sent: Monday, August 11, 2025 1:49:58 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office CHIPS Program Office,

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Sincerely,

jimkeenan48@icloud.com
108 Madison Road
Lansdowne , Pennsylvania 19050

Archived: Thursday, October 16, 2025 10:05:54 AM

From: [Martin Horwitz](#)

Mail received time: Mon, 11 Aug 2025 17:50:30

Sent: Monday, August 11, 2025 1:50:31 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Sincerely,

Martin Horwitz
martin7ahorwitz@yahoo.com
1326 23rd Ave
San Francisco, California 94122

Archived: Thursday, October 16, 2025 8:41:25 AM

From: [Amy M](#)

Mail received time: Mon, 11 Aug 2025 17:56:00

Sent: Monday, August 11, 2025 1:56:00 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Sincerely,

Amy M
tearingitdown3@yahoo.com
332 Campbell Dr
Rogersville, Tennessee 37857

Archived: Thursday, October 16, 2025 9:34:36 AM

From: [Frances m](#)

Mail received time: Mon, 11 Aug 2025 17:56:17

Sent: Monday, August 11, 2025 1:56:18 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Sincerely,

Frances m
conquerthisgreatdivide3@aol.com
332 Campbell Dr
Rogersville, Tennessee 37857

Archived: Thursday, October 16, 2025 9:23:45 AM

From: dmatza9@gmail.com

Mail received time: Mon, 11 Aug 2025 18:00:29

Sent: Monday, August 11, 2025 2:00:30 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

dmatza9@gmail.com
28 Fountain St
Clinton, New York 13323

Archived: Thursday, October 16, 2025 11:03:47 AM

From: [Pete Sikora](#)

Mail received time: Mon, 11 Aug 2025 18:01:50

Sent: Monday, August 11, 2025 2:01:51 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- **Greenhouse Gases:** The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. In fact, the enormous energy use appears like to lead to a surge in climate-heating pollution. Micron must create a comprehensive and BINDING AND ENFORCEABLE plan to generate or purchase renewable energy using wind and solar –and without relying on renewable energy credits or using renewable energy that is already on the grid – to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- **Job Access, Housing & Transportation.** The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to

expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents. I also want the Micron development, if approved, to lead to UNION jobs, so there should be labor rights and standards in any agreement.

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.

- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.

Thank you for your consideration of my comments.

Sincerely,

Pete Sikora
pete.sikora@gmail.com
275 Degraw St #4
Brooklyn, New York 11231

Archived: Thursday, October 16, 2025 10:25:21 AM

From: kminault@gmail.com

Mail received time: Mon, 11 Aug 2025 18:03:38

Sent: Monday, August 11, 2025 2:03:40 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
- **Greenhouse Gases:** The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar –and without relying on renewable energy credits or using renewable energy that is already on the grid – to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,

kminault@gmail.com
311 W. Glenwood Ave.
Knoxville, Tennessee 37917

Archived: Thursday, October 16, 2025 9:08:05 AM

From: cdmeforplanet1@gmail.com

Mail received time: Mon, 11 Aug 2025 18:05:40

Sent: Monday, August 11, 2025 2:05:40 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
- **Greenhouse Gases:** The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar –and without relying on renewable energy credits or using renewable energy that is already on the grid – to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,
Catherine

cdmeforplanet1@gmail.com
210-21 48th Ave
Bayside Hills, New York 11364-1125

Archived: Thursday, October 16, 2025 10:28:45 AM

From: [Jerry Lee](#)

Mail received time: Mon, 11 Aug 2025 18:09:11

Sent: Monday, August 11, 2025 2:09:12 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
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Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,

Jerry Lee
jerryglee1102@gmail.com
2211 Legacy Park Loop
Tuscaloosa , Alabama 35404

Archived: Wednesday, October 22, 2025 9:44:26 AM

From: [Jennifer Kline](#)

Mail received time: Mon, 11 Aug 2025 18:17:40

Sent: Monday, August 11, 2025 2:17:41 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

I write as a parent, a New Yorker, and a data analyst. Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
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requirements of the New York Green CHIPS Act.

Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,

Jennifer Kline

jenniferckline@gmail.com

547 Lincoln Pl

Brooklyn , New York 11238

Archived: Thursday, October 16, 2025 11:03:42 AM

From: [Pamela Strassberg](#)

Mail received time: Mon, 11 Aug 2025 18:21:44

Sent: Monday, August 11, 2025 2:21:45 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
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Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,

Pamela Strassberg
pamstrassberg@gmail.com
65 Montrose Dr
Delmar, New York 12054

Archived: Thursday, October 16, 2025 9:33:14 AM

From: [Nicole Fonger](#)

Mail received time: Mon, 11 Aug 2025 18:23:22

Sent: Monday, August 11, 2025 2:23:23 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York.

I have lived in Syracuse, NY for 8 years. Over this time, I have learned of the long history of environmental issues in our Central New York region. We have some of the worst pollution in both our water and homes from lead, and in our lakes from past improper disposal of toxic waste into waterways. Much of this history is tied directly to actions from business owners to not adequately protect residents.

One of my biggest concerns about the upcoming Micron development and impact is on healthy air and water for Central New York for years to come. I have great concerns about the amount of water Micron will use and how waste will be disposed of into the water thus impacting the environment.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
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Affordable and abundant water and energy: The DEIS does not ensure Micron’s massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

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Thank you for your consideration of my comments.

Sincerely,

Nicole Fonger

Nicole Fonger

nfonger@syr.edu

1001 Cumberland Ave

Syracuse, New York 13210

Archived: Thursday, October 16, 2025 8:55:12 AM

From: [Mary Bautista](#)

Mail received time: Mon, 11 Aug 2025 18:25:59

Sent: Monday, August 11, 2025 2:26:00 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office CHIPS Program Office,

I have several issues with the impacts of Micron's proposed semiconductor factory on the public health and the Environment.

Please take into effect the following issues:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
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poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,

Mary Bautista
mplbautista@nyc.rr.com
622 W 138th St.
New York, New York 10031

Archived: Thursday, October 16, 2025 9:57:15 AM

From: [Melissa Hoffmann](#)

Mail received time: Mon, 11 Aug 2025 18:26:59

Sent: Monday, August 11, 2025 2:26:59 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

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Thank you for your consideration of my comments.

Sincerely,

Melissa Hoffmann
melissahoffmann5@gmail.com
188 Mill st
Poughkeepsie, New York 12601

Archived: Thursday, August 14, 2025 2:24:19 PM

From: dianed@nirs.org

Mail received time: Mon, 11 Aug 2025 18:27:35

Sent: Monday, August 11, 2025 2:27:36 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

I oppose the proposed Micron facility in Clay, New York because of all the water and energy it will consume taking it from existing needs in the state for decades to come. Because the 20,000-page report is so long, please EXTEND the comment period for at least 2 months.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
- **Greenhouse Gases:** The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar –and without relying on renewable energy credits or using renewable energy that is already on the grid – to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.
Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.
- **Job Access, Housing & Transportation.** The DEIS does not ensure communities with high

poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,

dianed@nirs.org

Burr Rd

West Falls NY, New York 14170

Archived: Thursday, October 16, 2025 11:03:38 AM

From: [Phoenix Muchowski](#)

Mail received time: Mon, 11 Aug 2025 18:28:09

Sent: Monday, August 11, 2025 2:28:09 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Phoenix Muchowski
strych916@icloud.com
17540 St. Francis Blvd
Ramsey, Minnesota 55303

Archived: Thursday, August 14, 2025 2:24:29 PM

From: [Iris Arno](#)

Mail received time: Mon, 11 Aug 2025 18:36:07

Sent: Monday, August 11, 2025 2:36:08 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Iris Arno
hisk37@gmail.com
37 Garland Drive
Hastings on Hudson, New York 10706

Archived: Thursday, August 14, 2025 2:24:34 PM

From: [Sandra Baptista](#)

Mail received time: Mon, 11 Aug 2025 18:37:15

Sent: Monday, August 11, 2025 2:37:16 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Sandra Baptista
svbaptista@gmail.com
34 Berry St
Brooklyn, New York 11249

Archived: Thursday, August 14, 2025 2:24:39 PM

From: even&r@yahoo.com

Mail received time: Mon, 11 Aug 2025 18:40:31

Sent: Monday, August 11, 2025 2:40:32 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

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Thank you for your consideration of my comments.

Sincerely,

even8r@yahoo.com
56 Military Rd
Buffalo, New York 14207

Archived: Thursday, August 14, 2025 2:24:45 PM

From: ktquinlan@gmail.com

Mail received time: Mon, 11 Aug 2025 18:40:32

Sent: Monday, August 11, 2025 2:40:33 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

ktquinlan@gmail.com
354 N Montgomery
Newburgh, New York 12550

Archived: Thursday, August 14, 2025 2:22:59 PM

From: [AJ cho](#)

Mail received time: Mon, 11 Aug 2025 18:41:30

Sent: Monday, August 11, 2025 2:41:31 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

AJ cho

amenoartemis@gmail.com

159 Santa Teresa

San Leandro, California 94579

Archived: Thursday, August 14, 2025 2:23:04 PM

From: grenardmarkhayduke@yahoo.com

Mail received time: Mon, 11 Aug 2025 18:44:05

Sent: Monday, August 11, 2025 2:44:06 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

grenardmarkhayduke@yahoo.com
4222 E. Windrose Dr. #2009
Phoenix, Yuck, Sprawl, Arizona 85032

Archived: Thursday, October 16, 2025 8:51:30 AM

From: [Ryan Baka](#)

Mail received time: Mon, 11 Aug 2025 18:45:32

Sent: Monday, August 11, 2025 2:45:33 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Ryan Baka

ryan.baka@icloud.com

3107 Knox Ave N.

Minneapolis , Minnesota 55411

Archived: Thursday, August 14, 2025 2:23:14 PM

From: [James Deshotels](#)

Mail received time: Mon, 11 Aug 2025 18:48:45

Sent: Monday, August 11, 2025 2:48:46 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

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Thank you for your consideration of my comments.

Sincerely,

James Deshotels
jdes@loyno.edu
161 Vondera Dr
Robertsville, Missouri 63072

Archived: Thursday, August 14, 2025 2:23:19 PM

From: yamaprints@gmail.com

Mail received time: Mon, 11 Aug 2025 18:51:09

Sent: Monday, August 11, 2025 2:51:10 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

yamaprints@gmail.com

yamaprints@gmail.com

New York, New York 10025

Archived: Thursday, August 14, 2025 2:23:24 PM

From: [Cody Goin](#)

Mail received time: Mon, 11 Aug 2025 18:52:34

Sent: Monday, August 11, 2025 2:52:35 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

Cody Goin
codygoin2021@gmail.com
3073 State Highway 73
Buffalo, Missouri 65622

Archived: Thursday, October 16, 2025 11:03:33 AM

From: [Brian Still](#)

Mail received time: Mon, 11 Aug 2025 18:52:34

Sent: Monday, August 11, 2025 2:52:35 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

Brian Still
brianmstill@gmail.com
4077 3rd Ave
San Diego , California 92103

Archived: Thursday, October 16, 2025 9:28:21 AM

From: [Tom Ellis](#)

Mail received time: Mon, 11 Aug 2025 18:52:36

Sent: Monday, August 11, 2025 2:52:37 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Hello,

I am opposed to the Micron project and believe it should be rejected. The data center combined with artificial intelligence, and similar facilities elsewhere in the US, will lead to steep job losses in the United States.

An article by Peggy Noonan on Page A-13 of the August 9-10 Wall Street Journal reported that many analysts believe AI will sharply reduce the job market for high-skilled labor, a trend that probably has begun. Why permit and subsidize a massive job-wrecking industry?

Giant data centers use vast amounts of water and electricity. Many who watch and participate in energy policy in New York believe NY can not achieve the renewable energy goals mandated by the 2019 Climate Law. So why license a facility that will greatly increase electricity demand?

Tom Ellis
Albany, NY

Tom Ellis
tomellis107@gmail.com
44 North Pine Avenue
Albany, New York 12203

Archived: Thursday, October 16, 2025 11:03:28 AM

From: rowell.pat3@gmail.com

Mail received time: Mon, 11 Aug 2025 18:53:18

Sent: Monday, August 11, 2025 2:53:20 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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rowell.pat3@gmail.com
1520 Grassymeade Lane
Alexandria,, Virginia 22308

Archived: Thursday, October 16, 2025 11:03:23 AM

From: emmagoldmansherman@gmail.com

Mail received time: Mon, 11 Aug 2025 18:55:31

Sent: Monday, August 11, 2025 2:55:32 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

You haven't given anyone enough time to absorb all the information necessary to properly respond. It's as if you think this is a done deal and the public doesn't get a say. I appreciate the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. But it's crazy fast! And I don't want it. And you aren't giving us time to respond. I want a clean NYC. I want clean solar. I want you to pivot.

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Sincerely,

emmagoldmansherman@gmail.com
270 Seaman Ave
New York, New York 10034

Archived: Thursday, October 16, 2025 9:31:40 AM

From: [Louis Esposito](#)

Mail received time: Mon, 11 Aug 2025 18:58:54

Sent: Monday, August 11, 2025 2:58:54 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Sincerely,

Louis Esposito
lasurf4life@gmail.com
325 Marine Ave. Apt. #B8
Brooklyn, New York 11209

Archived: Thursday, August 14, 2025 2:23:54 PM

From: [Martha Gorak](#)

Mail received time: Mon, 11 Aug 2025 19:01:51

Sent: Monday, August 11, 2025 3:01:52 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Sincerely,

Martha Gorak
martha2503@gmail.com
837 Jaquet Dr
Bellaire, Texas 77401

Archived: Thursday, August 14, 2025 2:23:59 PM

From: [Anthony Belletier](#)

Mail received time: Mon, 11 Aug 2025 19:08:29

Sent: Monday, August 11, 2025 3:08:31 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,

Anthony Belletier
belletierlaw@gmail.com
603 S Beech St
Syracuse, New York 13210

Archived: Thursday, August 14, 2025 2:24:04 PM

From: [Sean Graham](#)

Mail received time: Mon, 11 Aug 2025 19:12:53

Sent: Monday, August 11, 2025 3:12:54 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. I am an active citizen in Syracuse and I have heard both the hopes and fears of this plant - I hope we can avoid mistakes now with planning and discussion and not re-think bad choices in the future.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss. Wetland replacement is not as simple as acres created to match acres lost. There needs to be a higher-level analysis of measuring how the wetland environment is handling the plant.
- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
- **Greenhouse Gases:** The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions.

Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar –and without relying on renewable energy credits or using renewable energy that is already on the grid – to meet New York State’s climate change objectives and the requirements of the New York Green CHIPS Act.

Affordable and abundant water and energy: The DEIS does not ensure Micron’s massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. How will Micron ensure that transportation to the plant is not a barrier for workers within Syracuse?The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Syracuse already has inadequate housing and high rents. It will take significant resources to provide enough housing for plant workers. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,

Sean Graham
seancgraham@gmail.com
247 Shotwell Park
Syracuse, New York 13206

Archived: Thursday, August 14, 2025 1:53:11 PM

From: [ALISON LENTZ](#)

Mail received time: Mon, 11 Aug 2025 19:13:29

Sent: Monday, August 11, 2025 3:13:30 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office CHIPS Program Office,

I am very worried that there has not been enough time to collect comments regarding this issue.

Syracuse may be in serious risk unless all issues are considered/

PLEASE extend the comment period.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

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- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
- **Greenhouse Gases:** The DEIS does not state how Micron will meet its own 100% renewable

energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar –and without relying on renewable energy credits or using renewable energy that is already on the grid – to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

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Thank you for your consideration of my comments.

Sincerely, Alison and Ralph Lentz

ALISON LENTZ

carvedinmarble@gmail.com

327 STATE STREET

CARTHAGE, New York 13619

Archived: Thursday, August 14, 2025 1:53:17 PM

From: juliad370@gmail.com

Mail received time: Mon, 11 Aug 2025 19:14:44

Sent: Monday, August 11, 2025 3:14:45 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

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Thank you for your consideration of my comments.

Sincerely,

juliad370@gmail.com
3230 INDIANOLA AVE
COLUMBUS, Ohio 43202

Archived: Thursday, August 14, 2025 1:53:23 PM

From: hlhays75@gmail.com

Mail received time: Mon, 11 Aug 2025 19:15:34

Sent: Monday, August 11, 2025 3:15:35 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

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- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
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Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

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Thank you for your consideration of my comments.

Sincerely,

hlhays75@gmail.com
3301 Tice Cr. Dr. #6
Walnut Creek, California 94595

Archived: Thursday, October 16, 2025 11:03:18 AM

From: [Robin Patten](#)

Mail received time: Mon, 11 Aug 2025 19:15:59

Sent: Monday, August 11, 2025 3:16:00 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

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Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

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Thank you for your consideration of my comments.

Sincerely,

Robin Patten
aweeble25@gmail.com
4301 S Bryant Ave apt 131
Del City, Oklahoma 73115

Archived: Thursday, October 16, 2025 9:20:03 AM

From: [Doug Couchon](#)

Mail received time: Mon, 11 Aug 2025 19:17:59

Sent: Monday, August 11, 2025 3:18:00 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

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Thank you for your consideration of my comments.

Sincerely,

Doug Couchon
dcouchon@yahoo.com
109 Foster Avenue
Elmira, New York 14905

Archived: Thursday, October 16, 2025 9:54:55 AM

From: [Regan Hayes](#)

Mail received time: Mon, 11 Aug 2025 19:19:07

Sent: Monday, August 11, 2025 3:19:08 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

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- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
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Thank you for your consideration of my comments.

Sincerely,

Regan Hayes
reganhayes2018@gmail.com
120 Camillus Park Drive
Camillus, New York 13031

Archived: Thursday, October 16, 2025 11:03:13 AM

From: [Jim Malone](#)

Mail received time: Mon, 11 Aug 2025 19:20:29

Sent: Monday, August 11, 2025 3:20:29 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

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Thank you for your consideration of my comments.

Sincerely,
Jim Malone

Jim Malone
ritajim12@gmail.com
12 Turvey Drive
Donabate, Fingal

Archived: Thursday, August 14, 2025 1:53:48 PM

From: [Julie Fogden](#)

Mail received time: Mon, 11 Aug 2025 19:21:01

Sent: Monday, August 11, 2025 3:21:02 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,
Julie Fogden

Julie Fogden
jgfogden@gmail.com
PO Box 52
Wanakena , New York 13695

Archived: Thursday, October 16, 2025 11:34:16 AM

From: [Rita O'Sullivan](#)

Mail received time: Mon, 11 Aug 2025 19:22:54

Sent: Monday, August 11, 2025 3:22:55 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,
Rita O'Sullivan

Rita O'Sullivan
osullivan.rita@gmail.com
12 Turvey Drive
Donabate, Fingal

Archived: Thursday, August 14, 2025 1:53:58 PM

From: betsy@betsyroot.com

Mail received time: Mon, 11 Aug 2025 19:25:49

Sent: Monday, August 11, 2025 3:25:50 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

betsy@betsyroot.com

4545 SENECA RD

TRUMANSBURG, New York 14886

Archived: Thursday, October 16, 2025 11:03:08 AM

From: [Leigh Swanker](#)

Mail received time: Mon, 11 Aug 2025 19:26:18

Sent: Monday, August 11, 2025 3:26:19 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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I find this absolutely abhorrent that in our state of climate change and major temperature variations, carbon build up etc that the heads of our government are willing to disturb the mature wetlands that absorb much of the carbon that is released. New wetlands will not do this for hundreds of years. Will our planet be unlivable by then? Also, seriously, who agreed to only a 2 for 1 replacement on the acres of wetlands? Clearly someone who does not live in this area.

I also find it interesting that the DEIS does not address the weather in CNY. The winters can have the roads shut down because of snow and ice. How will snowmelt affect the water runoff problem? I am sure it will only exacerbate it. What about the number of days below zero. How does that affect the process? What about the slippery roads and trucks transporting the PFAS chemicals? I can only imagine there will be more accidents.

- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize

contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols. What about the contamination to the environment? The DEIS does not address that. What guarantees does this community have that we will not become a modern day Onondaga Lake issue with polluted land areas? I bet when Allied Chemical began their project to build here, the politicians were in awe, little did they know what they did to a beautiful lake.

* The DEIS did not address the noise pollution. What about the community members who live in this area? What will the noise decibel level be during construction? Please provide this.

*. I am very concerned about the flooding issues that will occur. The amount of impervious surface that this plant will take, the reduction of wetland that are connected, what guarantee do the residents have that their homes and yards will not flood? Clay doesn't allow water to seep through easily. Why do you think this is called the town of Clay?

- Greenhouse Gases: The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar –and without relying on renewable energy credits or using renewable energy that is already on the grid – to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. This is a major concern that the ratepayers rates will escalate to support the power grid changes, the cost of water will escalate and that the county is on the hook to provide a VERY expensive water treatment upgrades at Oak Orchard plant. We have seen how the county has not been effective at managing upgrades to water treatment facilities.

The DEIS does not address the increased cost of living that will occur in this area. How will these 'good paying jobs' fare for those individuals and will those people employed at those jobs still be over the poverty level? The average home price in Boise is over \$400,000 and in Syracuse area almost \$200,000. As this Micron plant develops, what will happen to the cost of living then? I imagine the housing market will skyrocket and become similar to Boise. How does a 'good paying' job employee of \$60,000 a year afford a house at \$400,000? Take a loan for 60 years?

The DEIS does not really address the number of people already unemployed in the Syracuse area and how many jobs are available but still there are not enough workers.

Is this entire project engineered to our politicians have their 'legacy'? I can see their headstones now: McMahan, Mannion, Schumer " he orchestrated the biggest contamination project in CNY and didn't care about their constituents, community or about the environment ".

McMahon, what ever happened to the idea of a sports facility. Between fields, ice rinks, hotels, restaurants, shopping, this would bring in continuous income. People travel to the same areas years and years to attend /participate in sporting events.

If this were in schumer's backyard, would you be excited about it?

With their being ONE comment day in July and only the minimum amount of days to respond to this 20,000 page document, leads a competent person to believe that the politicians and Micron are hiding something. I don't under why Micron would want to build in an area that the residents and communities are not 100% sold on this idea. What kind of reception will they get? If it is going so well in Manassas VA and Boise, ID why come out here?

What about the increase in public services that will be needed: police, fire, ambulance let alone medical care? Who will be paying for this? Will this once again fall on the backs of the already overtaxed New York State/ OnondagaCounty residents? I don't believe the DEIS addresses any of that. Medical services here are already taxed beyond belief. People cannot be seen in emergency rooms without a 12 hour wait, then they wait for several days in the ER before actually getting a room. Again, don't believe the DEIS addresses any of this. What will Micron do to help alleviate this issue since it will be because of them that there is a population increase. Please address this issue.

Thank you for your consideration of my comments.

Sincerely,
Leigh Swanker

Leigh Swanker
swank6179@Gmail.com
4966 Greenberry Dr
Clay, New York 13041

Archived: Thursday, October 16, 2025 11:03:03 AM

From: [James Mulholland](#)

Mail received time: Mon, 11 Aug 2025 19:36:59

Sent: Monday, August 11, 2025 3:37:00 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,
James Mulholland

James Mulholland
jmmulholland@gmail.com
431 East Genesee Parkway
Syracuse, New York 13214

Archived: Thursday, October 16, 2025 10:14:02 AM

From: cooperjennifer093@gmail.com

Mail received time: Mon, 11 Aug 2025 19:40:10

Sent: Monday, August 11, 2025 3:40:11 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

cooperjennifer093@gmail.com
14522 SW Grayling Lane
Beaverton, Oregon 97007

Archived: Thursday, October 16, 2025 10:06:46 AM

From: marc.imlay@mdsierra.org

Mail received time: Mon, 11 Aug 2025 19:43:49

Sent: Monday, August 11, 2025 3:43:51 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Sincerely,

marc.imlay@mdsierra.org
2321 woodberry Drive
Bryans Road, Maryland 20616

Archived: Thursday, October 16, 2025 8:45:01 AM

From: [JL Angell](#)

Mail received time: Mon, 11 Aug 2025 19:51:25

Sent: Monday, August 11, 2025 3:51:26 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

JL Angell
jangel@earthlink.net
2391 Ponderosa Rd
Rescue, California 95672

Archived: Thursday, October 16, 2025 11:02:59 AM

From: bluetoothfairy18@gmail.com

Mail received time: Mon, 11 Aug 2025 20:01:50

Sent: Monday, August 11, 2025 4:01:51 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
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Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,

bluetoothfairy18@gmail.com
50350 Highway 101 N., Laytonville, CA 95454
Laytonville, California 95454

Archived: Thursday, October 16, 2025 11:02:54 AM

From: [Alexander Noyes](#)

Mail received time: Mon, 11 Aug 2025 20:02:18

Sent: Monday, August 11, 2025 4:02:19 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Firstly, thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York.

I urge consideration and response to the following issues:

- **Greenhouse Gases:** The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar –and without relying on renewable energy credits or using renewable energy that is already on the grid – to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

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- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.

- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.

- **Job Access, Housing & Transportation.** The DEIS does not ensure communities with high

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Thank you for your consideration of my comments.

Sincerely,

Alex Noyes

Alexander Noyes

noyes.alex@gmail.com

963 Kent Ave, Apt D1

Brooklyn, New York 11205

Archived: Thursday, October 16, 2025 9:05:20 AM

From: jenna.cain56@gmail.com

Mail received time: Mon, 11 Aug 2025 20:02:40

Sent: Monday, August 11, 2025 4:02:41 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

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Thank you for your consideration of my comments.

Sincerely,

jenna.cain56@gmail.com
14 Keats Rd
Thornwood, New York 10594

Archived: Thursday, October 16, 2025 11:02:49 AM

From: [Marni Libby](#)

Mail received time: Mon, 11 Aug 2025 20:04:20

Sent: Monday, August 11, 2025 4:04:21 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Marni Libby
mlibz936@gmail.com
218 Kensington Pl
Syracuse, New York 13210

Archived: Thursday, October 16, 2025 10:19:27 AM

From: [Kitty Kellogg](#)

Mail received time: Mon, 11 Aug 2025 20:05:21

Sent: Monday, August 11, 2025 4:05:23 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,
Kitty Kellogg

Kitty Kellogg
keldel1@aol.com
112 Euclid deive
Fayetteville , New York 13065

Archived: Thursday, October 16, 2025 10:03:28 AM

From: tamsin.hollo@gmail.com

Mail received time: Mon, 11 Aug 2025 20:06:31

Sent: Monday, August 11, 2025 4:06:33 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York.

I have family roots in the Finger Lakes Region and currently live in the PFAS-affected community of Newburgh NY. A project of this scale, though so important to the financial future of Syracuse, must also take into account the mitigation of potential environmental future harms, so that this generation's benefit doesn't become the next generation's liability.

Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

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Thank you for your consideration of my comments.

Sincerely,

tamsin.hollo@gmail.com

120 1st Street

Newburgh, New York 12550

Archived: Thursday, October 16, 2025 9:44:53 AM

From: [MELLENY HALE](#)

Mail received time: Mon, 11 Aug 2025 20:09:04

Sent: Monday, August 11, 2025 4:09:05 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office CHIPS Program Office,

Why is it necessary to relocate the Oak Orchard SolarBank farm? While one can see the footprint of the main fabrication structures there isn't sufficient explanation as to why the rest of the space allocation that requires this relocation.

Solar should be an integral part of this project. The energy demand is going to be huge. If the promise of using 100% renewable energy is to be met, then why not explain why this is not an explicitly stated part of the plan?

I understand that there may be ultra-low vibration levels that need to be met for nanoscale fabrication of semi-conductors so that placing solar panels on the roofs of these Fabs is possibly not feasible. But considering the huge acreage that is being cleared for parking, why not commit to solar panels over those areas?

Melleny Hale

MELLENY HALE

MellAnieHale@gmail.com

405 Yale Avenue

Syracuse, New York 13219

Archived: Wednesday, October 22, 2025 9:44:41 AM

From: senorajauregui68@yahoo.com

Mail received time: Mon, 11 Aug 2025 20:13:58

Sent: Monday, August 11, 2025 4:14:00 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

senorajauregui68@yahoo.com
6300 Denslow Way
Sacramento , California 95823

Archived: Thursday, October 16, 2025 8:35:17 AM

From: sidra.s.ahmad@gmail.com

Mail received time: Mon, 11 Aug 2025 20:14:58

Sent: Monday, August 11, 2025 4:14:59 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

sidra.s.ahmad@gmail.com
6910 Yellowstone Blvd
Forest Hills, New York 11375

Archived: Thursday, October 16, 2025 9:28:54 AM

From: [Martha Ellison](#)

Mail received time: Mon, 11 Aug 2025 20:16:54

Sent: Monday, August 11, 2025 4:16:56 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,

Martha Ellison
marthaellison1@gmail.com
130 N. Ryans Way
Saint Joseph, Missouri 64506

From: Gisela Sanders-Alcántara <noreply@adv.actionnetwork.org>
Sent: Monday, August 11, 2025 4:21 PM
To: chipsnepa
Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

CHIPS Program Office CHIPs Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
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Thank you for your consideration of my comments.

Sincerely,

Gisela Sanders-Alcántara
gisela.sanders@gmail.com
189 Madison Street, apt. 1
Brooklyn, New York 11216

From: Justin Philipps <noreply@adv.actionnetwork.org>
Sent: Monday, August 11, 2025 4:29 PM
To: chipsnepa
Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

CHIPS Program Office CHIPs Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Justin Philipps
jphilipps1259@gmail.com
1385 Independence Court
Newark, Ohio 43055

Archived: Thursday, October 16, 2025 9:56:20 AM

From: [Phil Heinlein](#)

Mail received time: Mon, 11 Aug 2025 20:29:17

Sent: Monday, August 11, 2025 4:29:18 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Phil Heinlein
pdheinlein@gmail.com
1150 Cooper Point St.
Summerville, South Carolina 29485

Archived: Thursday, October 16, 2025 9:29:25 AM

From: emswaine9@gmail.com

Mail received time: Mon, 11 Aug 2025 20:34:11

Sent: Monday, August 11, 2025 4:34:12 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of these comments.

Sincerely,

emswaine9@gmail.com

49 Pickford Ave

Buffalo, New York 14223-3107

Archived: Thursday, August 14, 2025 1:42:08 PM

From: [Lynn Cahill-Hoy](#)

Mail received time: Mon, 11 Aug 2025 20:45:44

Sent: Monday, August 11, 2025 4:45:45 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York.

Data from GlobalFoundries in Vermont revealed 17 different PFAS in wastewater and poisonous chemicals are flowing into the Winooski River and Lake Champlain. There are thousands of PFAS chemicals and targeted screening methods only reveal a few of them.

The Chips and Science Act has an opportunity to strengthen and important industry and make it clean and sustainable. Micron must assure our community that PFAS will be removed from wastewater, using technologies designed to remove all PFAS.

Chips Acts funds must be used to research, reduce and eventually phase out the use of PFAS for semiconductor production and the community must be updated through public reporting. workers and those in the Syracuse communities must be assured that our waters and lands will remain clean as a priority over corporate appropriations.

Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same.

Sincerely,
Lynn Cahill-Hoy
Marcellus, NY

Lynn Cahill-Hoy
lcahillhoy@twcny.rr.com
4413 Lathrop Drive
Marcellus, New York 13108

Archived: Thursday, August 14, 2025 1:42:13 PM

From: [Syd Kellogg](#)

Mail received time: Mon, 11 Aug 2025 20:47:25

Sent: Monday, August 11, 2025 4:47:26 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Syd Kellogg

sydthekid521@gmail.com

5379 Mud Mill Rd

Brewerton, New York 13029

Archived: Thursday, October 16, 2025 10:24:26 AM

From: [Diana Kliche](#)

Mail received time: Mon, 11 Aug 2025 20:51:21

Sent: Monday, August 11, 2025 4:51:22 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Diana Kliche
klichediana@gmail.com
3351 Rldge Park Court
Long Beach, California 90804

Archived: Thursday, October 16, 2025 10:49:36 AM

From: [Dennis Lerner](#)

Mail received time: Mon, 11 Aug 2025 20:53:57

Sent: Monday, August 11, 2025 4:53:58 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
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I urge consideration and response to the following issues and concerns:

The rate at which we are gaining new knowledge and understanding about the consequential direct and indirect negative impacts of human activity on the environment, including human health and safety is accelerating at the same or quicker rate than knowledge generally. How does the DEIS and Micron propose to deal with this new knowledge when it relates to the construction, operation, or closure of the proposed Micron facility? Who decides whether the impact of such new knowledge has consequential impacts on the environment. What obligation does Micron have to mitigate these impacts? Is there the potential to change the Micron operating permit, or to stop all or part of its operations.

For chemical products there is the federal requirement for an MSDS (Material Safety Data Sheet) for each chemical, yet it is my understanding that Micron with use and or produce chemicals that for business reasons have not been disclosed. What checks and measures are provided to equip the public and regulators with knowledge of the chemicals being produced, used, or disposed of in connection with Micron's operations, now and into the future?

It is assumed that Micron will seek longterm supply contracts for natural gas. According to the DEIS, that gas is to be used largely, if not exclusively for the high temperature destruction of regulated hazardous chemicals and waste. Based on these assumptions what incentives or requirements are there for Micron to seek and implement alternative processes for either the use, or destruction and disposal of such hazardous chemicals and waste?

Micron has stated among its reason from siting this facility in Central New York, the quality and

availability of water. The control and treatment of water flows in, around, and under the Micron facility and back into the environment has many dimensions. Wetlands and season flood areas will be lost, to parking and other project uses. Specifically, with regard to the proposed parking lot(s), why is there no provision for covering these spaces with photovoltaics? Why is there no provision for permeable pavements throughout the site, including parking lots? Why is there no provision for groundwater impoundment ponds, as are required elsewhere, to manage building and pavement runoff? These would offer a way of reducing wetland loss/replacement.

Will there be lined impoundment ponds for waste water treated on the Micron site? Why? What provision has been made for preventing leakage or over-running from such ponds? What provisions are there for the periodic safe and permitted disposal of sludges, and contaminated water from such ponds. Will such ponds be secured and covered to prevent persons from entering them and their surroundings? What steps have been provided to prevent fugitive gasses from leaving the Micron site?

Micron has pledged that 100% of its electrical power will come from renewable sources, but not from its own generation of electricity from renewable sources. Is Micron planning to use waste heat from its natural gas fueled generators to produce electricity for lighting, heating and other plant operations? If so, does that qualify as an off set to the environmental impact of the plant's use of natural gas? In any event, why aren't the roof surfaces being used for photovoltaic power generation for sale to the electric grid, especially since Micron's anticipated electric use does appear to have a separate schedule to protect other electric consumers who will see their electric rates climb in an already tight electricity supply environment?

In the past, the State and Federal governments have invested many billions of taxpayer dollars to encourage and support economic development projects, but rarely, if ever, of this magnitude. And in the past, some, perhaps even most of those projects have failed to produce a net positive return anywhere near the level touted. What provision is there for recoupment, direct or indirect, of government investment if Micron does not meet expectations?

Thank you for your consideration of my comments.

Sincerely,
Dennis Lerner
401 S. Salina St., Syr. N.Y.
lerner.law2@gmail.com
315.439.3863

Dennis Lerner
lerner.law2@gmail.com
120 E. Jefferson ST #613
Syracuse, New York 13202

Archived: Thursday, August 14, 2025 1:42:29 PM

From: sophie876@gmail.com

Mail received time: Mon, 11 Aug 2025 20:54:31

Sent: Monday, August 11, 2025 4:54:33 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,

sophief876@gmail.com

Dickenbruch 17

Stolberg, Nordrhein-Westfalen 52223

Archived: Thursday, August 14, 2025 1:42:34 PM

From: [Carol Baum](#)

Mail received time: Mon, 11 Aug 2025 20:56:48

Sent: Monday, August 11, 2025 4:56:50 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPs Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment for Micron's proposed manufacturing facility in Clay, New York.

Unfortunately I, as an ordinary citizen, could not possibly be expected to digest a 20,000 page report in 45 days, nor could I reasonably assess others' analysis of it in such a short period of time. The comment period needs to be extended. The unreasonable rush does make one wonder what is going on.

As an ordinary citizen, I am concerned. I hate that so often jobs and the environment are pitted against each other, because we need both. I guess the question is, what kind of sacrifices of one or the other are we willing to make, and under what conditions?

I am concerned about the water situation - both the destruction of the wetlands proposed by Micron, and the amount of water that Micron will need and the infrastructure that will be needed to support that. My understanding is that not enough research has gone into that.

Another concern is the possible contamination of the water, air and soil, given the use of (and need to dispose of) toxic chemicals. The wildfire smoke from Canada is a reminder of how far toxicity can travel. What exactly is being done to prevent accidents at the Micron plant, as well as disposal issues, etc. It is scary.

I also think of the workers - exactly how will they be protected? And who will they be? There is a lot of talk about how this will increase jobs for people currently living in Syracuse. Do we have any reason to believe that other than Micron's telling us so? What plans does Micron have to ensure communities with high poverty rates and individuals facing barriers to good jobs will have reasonable access to training, jobs, and career advancement at Micron? How will Micron work with state and local governments to make this happen?

And what about its other effects on the community at large? How will such a mega-company effect local politics? Will they be a "super-player", or will they have as much power as I have - which is some, but one could argue less than a multi-billion dollar company.

I appreciate the opportunity to comment, just wish there had been more time to think about it.

Sincerely,

Carol Baum

Carol Baum

carolbaum@riseup.net

430 Salt Springs Rd

Syracuse, New York 13224

Archived: Thursday, August 14, 2025 1:42:39 PM

From: watsonh1956@gmail.com

Mail received time: Mon, 11 Aug 2025 21:03:24

Sent: Monday, August 11, 2025 5:03:25 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
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Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,

watsonh1956@gmail.com
2223 W. Farm Rd. 98
Springfield , Missouri 65803

Archived: Thursday, August 14, 2025 1:42:44 PM

From: [Nicola Giorgio](#)

Mail received time: Mon, 11 Aug 2025 21:04:05

Sent: Monday, August 11, 2025 5:04:07 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

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Thank you for your consideration of my comments.

Sincerely,

Nicola Giorgio

ncl.grg@gmail.com

14 Jeff Rd

Largo, Florida 33774-2036

Archived: Thursday, August 14, 2025 1:42:49 PM

From: [Nick Byrne](#)

Mail received time: Mon, 11 Aug 2025 21:04:50

Sent: Monday, August 11, 2025 5:04:51 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Nick Byrne
narbyrne@gmail.com
118 Columbus Ave.
Valhalla, New York 10595

Archived: Thursday, October 16, 2025 1:40:05 PM

From: [Charles Wieland](#)

Mail received time: Mon, 11 Aug 2025 21:13:03

Sent: Monday, August 11, 2025 5:13:04 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Charles Wieland
casper55@hush.com
206A Compton Circle
San Ramon, 94583

Archived: Thursday, August 14, 2025 1:42:59 PM

From: wen6969@gmail.com

Mail received time: Mon, 11 Aug 2025 21:23:12

Sent: Monday, August 11, 2025 5:23:13 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

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Thank you for your consideration of my comments.

Sincerely,

wen6969@gmail.com

59 Eaton st

Manchester , New Hampshire 03109

Archived: Thursday, October 16, 2025 9:19:25 AM

From: [Hilary-Anne Coppola](#)

Mail received time: Mon, 11 Aug 2025 21:24:23

Sent: Monday, August 11, 2025 5:24:25 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

The 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1600 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

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- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols. Until an adequate plan is in place, Micron should not be allowed to proceed with their development.
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should not be allowed to proceed with their development. Climate chaos caused by human efforts is increasing and causing mass death and disease world-wide, and if Micron contributes to this apocalyptic issue, they should not be permitted to built.

Sincerely,
Hilary-Anne Coppola

Hilary-Anne Coppola
hilcoppola@gmail.com
107 Warren Street
Fayetteville, New York 13066

Archived: Thursday, August 14, 2025 1:43:09 PM

From: [Dita \[EXTERNAL\]](#) <<RE: Draft Environmental Asse

Mail received time: Mon, 11 Aug 2025 21:30:24

Sent: Monday, August 11, 2025 5:30:25 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

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Thank you for your consideration of my comments.

Sincerely,

Dita Škalič

dita.skalic@gmail.com

Levstikova ulica 4

Moravske Toplice, 9226

Archived: Thursday, October 16, 2025 10:49:41 AM

From: [Peter McCarthy](#)

Mail received time: Mon, 11 Aug 2025 21:30:45

Sent: Monday, August 11, 2025 5:30:46 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely, Peter McCarthy

Peter McCarthy
pmccar1100@gmail.com
1100 Cumberland Ave
Syracuse, New York 13210

Archived: Thursday, October 16, 2025 10:49:46 AM

From: [Ben Martin](#)

Mail received time: Mon, 11 Aug 2025 21:44:47

Sent: Monday, August 11, 2025 5:44:48 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
- **Greenhouse Gases:** The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar –and without relying on renewable energy credits or using renewable energy that is already on the grid – to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,

Ben Martin

benmartin12@stanfordalumni.org

49 Showers Dr Apt A340

Mtn View, California 94040

Archived: Thursday, October 16, 2025 10:26:30 AM

From: laurie.konwinski@dor.org

Mail received time: Mon, 11 Aug 2025 21:48:20

Sent: Monday, August 11, 2025 5:48:22 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

laurie.konwinski@dor.org
302 Cascadilla St
Ithaca, New York 14850

Archived: Thursday, October 16, 2025 9:45:17 AM

From: [MELLENY HALE](#)

Mail received time: Mon, 11 Aug 2025 21:53:45

Sent: Monday, August 11, 2025 5:53:46 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

There have already been notable failures in NY State at using incineration as a means of destroying PFAS.

I spent time reviewing the failures of the Norlite incinerator in Cohoes, NY with an employee at Johnson Control International, who was absorbed by JCI when it purchased Tyco, the company responsible for manufacture of some of the most notorious PerFluoro Alkylating Substances, those used in Aqueous Fire-Fighting Foam which resulted in serious contamination of the land and water at their Marinette site in Wisconsin.

My understanding has been that incineration itself is a reasonable solution to destruction of PFAS as opposed to shipping it around and sequestering it. Further, that contamination from Norlite may not have occurred if sufficient controls had been in place to maintain an adequate temperature (1400 oC ?) with a residence time of those target molecules at that temperature of at least 2 seconds (?) and appropriate real-time monitoring to assure those conditions were maintained.

It appears that Micron, however, is not intending to use incineration sufficient to demineralize the full complement of the various perfluoro compounds, since they are seeking waste management contracts to ship waste to New Jersey. Will those contracts be made with companies that will offer complete degradation of these toxics?

Are these compounds therefore being utilized without full accounting of the costs of their continued potential to cause harm?

Thank you for your consideration of my comments.

Sincerely,
Melleny Hale

MELLENY HALE
MellAnieHale@gmail.com
405 Yale Avenue
Syracuse, New York 13219

Archived: Thursday, October 16, 2025 10:09:54 AM

From: jeanne184490@gmail.com

Mail received time: Mon, 11 Aug 2025 21:54:50

Sent: Monday, August 11, 2025 5:54:51 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

jeanne184490@gmail.com
909A Grove St
Danville, Virginia 24541

Archived: Thursday, August 14, 2025 1:43:39 PM

From: jquirk66@gmail.com

Mail received time: Mon, 11 Aug 2025 21:58:13

Sent: Monday, August 11, 2025 5:58:14 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

jquirk66@gmail.com

147 Avenue A #2R

New York, New York 10009-4998

Archived: Thursday, October 16, 2025 9:24:17 AM

From: covingtondouglas@gmail.com

Mail received time: Mon, 11 Aug 2025 21:59:12

Sent: Monday, August 11, 2025 5:59:13 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

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Thank you for your consideration of my comments.

Sincerely,

covingtondouglas@gmail.com
365 Sackman st., 3B
Brooklyn, New York 11212

Archived: Thursday, August 14, 2025 1:43:49 PM

From: [Lee Cridland](#)

Mail received time: Mon, 11 Aug 2025 21:59:34

Sent: Monday, August 11, 2025 5:59:34 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPs Program Office,

I am taking this opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. First I ask that you please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report.

I am asking you to extend the comment period minimally to October 25, 2025. I would also note that there has been no public response to a petition signed by over 1500 residents of the region asking the same. This type of disregard for the public's concerns does not reflect well on your commitment to the community at large.

I would like to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
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Please show us that you care about this community. Extend the comment time and listen to the experts before you do irreparable damage to our community. Thank you for your consideration of my comments.

Sincerely,

Lee Cridland
lee.cridland@gmail.com
1204 N Glencove Rd
Syracuse, New York 13206

Archived: Thursday, October 16, 2025 10:49:51 AM

From: [Ronald Monsour](#)

Mail received time: Mon, 11 Aug 2025 22:03:47

Sent: Monday, August 11, 2025 6:03:47 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

To whom it may concern,

I am excited about the new jobs and economic revitalization that Micron promises to bring to the CNY area; however, I am deeply concerned about the impact of constructing the proposed 9,000 car parking lot on the surrounding wetlands.

I wanted to offer a suggestion for an alternative that may reduce the harm to these important ecosystems: potentially, there could be a shuttle bus transporting people from the abandoned Great Northern Mall parking lot to the Micron plant to eliminate the need for such a large paved area.

Additionally, would it be possible to refrain from paving the entire allotted land and use that time to develop alternatives that would prioritize wetland preservation as much as possible?

Lastly, could you consider constructing a high-rise parking garage to reduce the amount of paved area necessary for this project?

Thank you so much for considering my suggestions and giving the community the chance to voice our concerns about the environmental impact of this project.

Sincerely,

Ron Monsour

Ronald Monsour

ronaldmonsour@gmail.com

171 Robineau Rd

Syracuse, New York 13207

Archived: Thursday, August 14, 2025 1:43:58 PM

From: [Thyais Brown-Newball](#)

Mail received time: Mon, 11 Aug 2025 22:06:59

Sent: Monday, August 11, 2025 6:07:00 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Thyais Brown-Newball
tnadji@gmail.com
480 Lefferts Ave.
Brooklyn, New York 11225

Archived: Thursday, October 16, 2025 10:08:11 AM

From: [Grace Irish](#)

Mail received time: Mon, 11 Aug 2025 22:09:14

Sent: Monday, August 11, 2025 6:09:16 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,
Grace Irish

Grace Irish
graceocat12@gmail.com
114 Robineau Rd
Syracuse , New York 13207

Archived: Thursday, August 14, 2025 1:44:08 PM

From: probyngregory@gmail.com

Mail received time: Mon, 11 Aug 2025 22:21:02

Sent: Monday, August 11, 2025 6:21:02 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

probyngregory@gmail.com
10877 Deliban St
Tujunga, California 91042

Archived: Thursday, August 14, 2025 1:44:13 PM

From: [Kayla Fisk](#)

Mail received time: Mon, 11 Aug 2025 22:29:12

Sent: Monday, August 11, 2025 6:29:14 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,
Kayla Fisk

Kayla Fisk
k.fisk715@gmail.com
354 COUNTY ROUTE 10
Pennellville, New York 13132

Archived: Thursday, October 16, 2025 9:19:02 AM

From: f.conklin7@gmail.com

Mail received time: Mon, 11 Aug 2025 22:29:26

Sent: Monday, August 11, 2025 6:29:27 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

f.conklin7@gmail.com
1601 East Shore Dr
Ithaca, New York 14850

Archived: Thursday, August 14, 2025 1:44:23 PM

From: [AJ cho](#)

Mail received time: Mon, 11 Aug 2025 22:32:59

Sent: Monday, August 11, 2025 6:33:01 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

AJ cho

amenoartemis@gmail.com

159 Santa Teresa

San Leandro, California 94579

Archived: Thursday, August 14, 2025 1:44:28 PM

From: jhburnette@hotmail.com

Mail received time: Mon, 11 Aug 2025 22:33:49

Sent: Monday, August 11, 2025 6:33:50 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

jhburnette@hotmail.com
64 St.Johns Place
Lackawanna, New York 14218

Archived: Thursday, August 14, 2025 1:40:22 PM

From: [Analyse Adams](#)

Mail received time: Mon, 11 Aug 2025 22:39:03

Sent: Monday, August 11, 2025 6:39:05 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,
Analyse Adams

Analyse Adams
analyseadams@gmail.com
1986 Turnpike Road
Auburn, New York 13021

Archived: Thursday, October 16, 2025 9:45:33 AM

From: [Melleny HALE](#)

Mail received time: Mon, 11 Aug 2025 22:39:39

Sent: Monday, August 11, 2025 6:39:40 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPs Program Office,

Is it true that most of the natural gas that Micron is projected to consume is in incineration of PFAS?

What proportion of this energy is in boiling off water as a carrier medium before the shift to higher temperature required to degrade PFAS?

Are there steps in the manufacturing process that are not performed in aqueous medium that could be removed/separated and decontaminated at the vastly lower temperatures described by B. Trang et al. three years ago? This was a seminal paper in an issue of Science (published by AAAS) that offered far less energy-intensive means of dealing with these forever chemicals than was previously known:

LOW-TEMPERATURE MINERALIZATION OF PERFLUOROCARBOXYLIC ACIDS

Science, 8 Aug 2022, Vol 377, Issue 6608 pp. 839-8,
[<https://www.science.org/doi/10.1126/science.abm8868>]

This innovation requires a decontamination process in a non-aqueous medium. If the PFAS that Micron requires in their manufacturing process are in an aqueous medium, how much of the incineration is just in evaporating water?

Has Micron considered halting the “incineration” of its PFAS-laden waste as soon as the dehydration has occurred and switching to this far-less energy-consuming process where “PFCAs of various chain lengths undergo efficient mineralization in the presence of NaOH in mixtures of water and dimethyl sulfoxide (DMSO) at mild temperatures (80 to 120°C) and ambient pressure”?

These are FAR Milder conditions than the incineration conditions that are cited in most literature to be in the range of 1400 oC to be sufficient for 99.9% destruction of PFAS.

The power consumption of Micron is expected to be immense. Has this been a consideration in reducing that energy?

Competition for our local use of power is daunting and we wonder how that will affect our energy bills.

I further urge you to include a commitment to engage citizen monitors of the Micron process & development in a manner which is more open to public review, open to citizens like myself, who both want to see the success of Micron, but feel compelled to prevent the kind of carte blanche that resulted in the horrific contamination of our Onondaga Lake.

Thank you for your consideration of my comments.

Sincerely,

Melleny Hale

Melleny HALE

MellAnieHale@gmail.com

405 Yale Avenue

Syracuse13219, New York 13219

Archived: Thursday, October 16, 2025 10:49:56 AM

From: [Sharon Patterson](#)

Mail received time: Mon, 11 Aug 2025 22:41:05

Sent: Monday, August 11, 2025 6:41:06 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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CHIPS Program Office,

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I'm wondering the impact on local technology business. What impact is Micron going to have on our well established small technology businesses? When a big business like Micro leave the community (like Carrier/United Technology) a community is economically impacted in a way that leaves destitute.

Thank you for your consideration of my comments.

Sincerely,
Sharon

Sharon Patterson
patsha65@hotmail.com
219 Tecumseh Road
Syracuse , New York 13224

Archived: Thursday, August 14, 2025 1:40:39 PM

From: jsmcnells@gmail.com

Mail received time: Mon, 11 Aug 2025 22:42:57

Sent: Monday, August 11, 2025 6:42:58 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
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Thank you for your consideration of my comments.

Sincerely,

jsmnclns@gmail.com
405 Westcott St
Syracuse, New York 13210

Archived: Thursday, August 14, 2025 1:40:43 PM

From: liselbrenner@gmail.com

Mail received time: Mon, 11 Aug 2025 22:44:35

Sent: Monday, August 11, 2025 6:44:36 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

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CHIPS Program Office,

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I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
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Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,

liselbrenner@gmail.com
231 Jackson Street
Brooklyn, New York 11211

Archived: Thursday, August 14, 2025 1:40:48 PM

From: [Barry Gordon](#)

Mail received time: Mon, 11 Aug 2025 22:45:51

Sent: Monday, August 11, 2025 6:45:52 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Serious concerns about the planned Micron project in Clay, NY

The proposal for this project indicates several very serious problems. It will significantly affect many aspects of life in Onondaga County.

All life on this planet is dependent on water. The Great Lakes system, including Lake Ontario, contains TWENTY PER CENT OF THE WORLD'S SUPPLY OF POTABLE WATER! This water is ours to use but it is not ours to degrade. There is no assurance that PFAS and other toxic compounds used in the production of microchips will not contaminate Lake Ontario.

It is anticipated that construction of the factory will necessitate the destruction of at least two-hundred acres of wetlands that have an important ecological role. Destroyed wetlands cannot simply be replaced. They require many years, if not decades, to recreate and the "replacement" wetlands have to be geographically proximate to those that have been destroyed. This is not adequately addressed.

The Micron factory's energy requirements are mind-boggling, said to be as large as that of the combined states of Vermont and New Hampshire. The products of the factory are supposed to be "green" micro-chips. Any "green" energy needed to supply the factory means that a corresponding amount of "green" energy will not be available for other needs in our state. There are no plans for solar collectors on the potential acres of roofs for the parking facilities that will be required.

Micron has been given billions of dollars of scarce public funds to construct and operate this factory. The people of New York will not see any of this returned. If it is proposed that the jobs created by building and operating the factory be compensation to New Yorkers, there is no assurance of the number and quality of those jobs. Micron would not be coming here if they weren't confident that they will earn profits from the work done by those employees, and a commensurate portion of those profits should be returned to the people of New York.

The housing market in Central New York is very tight and there's no assurance that the influx of new workers and their families will not exacerbate this shortage. Also, at the planned size of the factory many aspects of daily life for Central New Yorkers (such as increased road traffic) will suffer. Why must the scale of this facility be so large?

Barry Gordon,
Onondaga County (Lysander) resident

Barry Gordon
barry@barrygordon.com
3648 Doyle Rd
Baldwinsville, New York 13027-9409

Archived: Thursday, August 14, 2025 1:40:53 PM

From: [Kristine Zettler](#)

Mail received time: Mon, 11 Aug 2025 22:57:07

Sent: Monday, August 11, 2025 6:57:07 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

To Whom It May Concern:

First, I would like to begin by saying I am deeply concerned about the potential environmental, social, and ethical impacts of the proposed Micron project in Central New York. Our region's clean water, air, and ecosystems are irreplaceable, and there must be absolute assurance that this project will not result in toxic waste, long-term contamination, or harm to community health.

I am alarmed by the lack of clear, transparent communication about how environmental risks — including wastewater management, chemical storage, and emissions — will be prevented and monitored. Our community deserves full disclosure and meaningful opportunities for input at every stage.

In addition, diversity, equity, and inclusion are core values for me and for many in our region. Micron has yet to make meaningful, enforceable commitments to DEI in its hiring, training, and community engagement practices. Without these commitments, I fear this project risks perpetuating inequities rather than building shared prosperity.

I urge decision-makers to ensure that environmental safeguards, transparent reporting, and binding DEI commitments are non-negotiable conditions for any project approval. Our community is not just a set of numbers on a corporate ledger — we are people who love and protect our home.

I appreciate the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- Water and Ecological Resources. The DEIS fails to adequately address hydrological and

ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.

- Protection of Air, Water, and Workers. The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.

- Greenhouse Gases: The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar –and without relying on renewable energy credits or using renewable energy that is already on the grid – to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,

Kristine Kinsella Zettler

Kristine Zettler
kinsellakristine@gmail.com
4824 Huntwood Path
Manlius, New York 13104

Archived: Thursday, August 14, 2025 1:40:58 PM

From: menjavi@gmail.com

Mail received time: Mon, 11 Aug 2025 23:11:33

Sent: Monday, August 11, 2025 7:11:33 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

menjavi@gmail.com

1326B Alewa Dr.

Honolulu, Hawaii 96816

Archived: Thursday, August 14, 2025 1:41:03 PM

From: cewest67@gmail.com

Mail received time: Mon, 11 Aug 2025 23:15:04

Sent: Monday, August 11, 2025 7:15:05 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

cewest67@gmail.com

3605 N Franklin St.

Muncie, Indiana 47303

Archived: Thursday, August 14, 2025 1:41:08 PM

From: [Linda Silberman](#)

Mail received time: Mon, 11 Aug 2025 23:15:44

Sent: Monday, August 11, 2025 7:15:45 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
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Thank you for your consideration of my comments.

Sincerely,

Linda Silberman

lsilberman@gmail.com

34-30 78th St., Apt. 4H

Jackson Heights, New York 11372

Archived: Thursday, August 14, 2025 1:41:13 PM

From: [Linda Fighera](#)

Mail received time: Mon, 11 Aug 2025 23:25:05

Sent: Monday, August 11, 2025 7:25:05 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

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Thank you for your consideration of my comments.

Sincerely,

Linda Fighera

teddylucylinda@yahoo.com

1 WELLS MANOR LANE APT.11

Rhinebeck, New York 12572-1934

Archived: Thursday, August 14, 2025 1:41:19 PM

From: crpolhamus@aol.com

Mail received time: Mon, 11 Aug 2025 23:32:39

Sent: Monday, August 11, 2025 7:32:40 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Dear Members of the Environmental Review Committee,

As a resident of Central New York and a deeply invested member of this community, I appreciate the opportunity to submit comments on the Micron 2025 Draft Environmental Impact Statement. The scale and ambition of this project represent a transformative moment for our region, and I believe we have a responsibility to ensure that its development reflects both historical awareness and forward-thinking stewardship.

To that end, I respectfully request that the following goals be considered and integrated into the final EIS:

- **Environmental and Historical Risk Awareness:**

Incorporate lessons from past industrial and environmental disasters—such as the pollution of Onondaga Lake and the Love Canal incident—by embedding robust risk assessment protocols and contingency planning throughout the project lifecycle.

- **Semiconductor Industry Vulnerabilities:**

Address the unique risks inherent to semiconductor manufacturing, including geopolitical instability, climate-related disruptions, and supply chain fragility, through adaptive design and resilient infrastructure planning.

- **Facility Design and Safety Architecture:**

Ensure the facility reflects best-in-class standards for containment, safety, and resiliency. This includes optimizing equipment placement and utility routing to minimize environmental and operational risks.

- **Small Business and Economic Equity:**

Promote inclusive economic growth by supporting small and local businesses in accessing opportunities within the semiconductor supply chain and mitigating barriers to participation.

- **Sustainability and Environmental Stewardship:**

Demonstrate leadership in sustainable development by integrating green building standards, renewable energy sources, and long-term environmental monitoring into the project's design and operation.

- **Community Engagement and Transparency:**

Maintain transparent and ongoing engagement with the local community to ensure public concerns are addressed and that the project reflects shared values of safety, sustainability, and equity.

This project presents an opportunity to set a new standard for responsible development—not just for Central New York, but for the global semiconductor industry. I urge the committee to

ensure that these principles are reflected in the final EIS and in all subsequent planning and implementation efforts.

Thank you for your time and consideration.

crpolhamus@aol.com

114 East Genesee St.

Fayetteville, New York 13066

Archived: Thursday, October 16, 2025 10:50:00 AM

From: [Deborah Rose](#)

Mail received time: Mon, 11 Aug 2025 23:33:45

Sent: Monday, August 11, 2025 7:33:46 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

As a long-time Syracuse resident, I have serious concerns about Micron's proposed semiconductor manufacturing plant in Clay and its impact on the environment and the quality of life in Central New York (CNY). I, like much of the CNY population, live here because of its beauty and its affordability. Both of these appear to be threatened by this project.

Bottom line, Micron's goal in bringing a chip plant to CNY is to make a profit. Millions of taxpayer dollars have already been committed to the project and we need to ensure that, in return, Micron operates in our best interests and addresses all potential environmental threats in both its construction and its ongoing operation. With our current knowledge about the long-lasting environmental and human damage that industrial development projects can bring, we can't repeat mistakes like those made in the past in service to the profit motive.

Based on my current understanding of the DEIS, I'm submitting the following comments that speak to some of my concerns about:

- the impacts of this project on CNY land, water and air
- the impacts on human and other species currently living on the land or surrounding areas
- the energy and water requirements of the project, and
- the inadequate plans for mitigation provided in the document.

Toxic chemicals – The DEIS does not identify all of the chemicals that will be used in the chip production process or adequately address plans for preventing release of these chemicals into the environment. Micron must provide a list of these chemicals and detailed plans for how all chemicals (including PFSAS and other toxic chemical) discharged during production will be processed in a way that will not pollute our air, land or water. The final DEIS should address how toxic waste captured during this process will be handled and stored. It should also address how toxic chemicals will be stored and handled pre-production to ensure the safety of Micron employees and the environment. And it should identify a plan for oversight and how compliance will be monitored. Micron must ensure that no toxic chemicals will be brought on site before all processes and equipment needed to prevent toxic chemicals from entering the environment are in place, including all county-operated wastewater treatment facilities.

Land use – Construction of the Micron plant will result in major changes to the landscape and significant habitat loss. The project site is home to not only endangered bat species and threatened and near-threatened bird species, but a rich variety of other species that add to the

richness of this area of CNY. With loss of habitat, many of these species will be displaced and some will die. The wetlands that are lost are simply not replaceable by the smaller scattered parcels of land that are planned to compensate for the current habitat. In addition, the proposed replacement wetland sites are yet to be developed and the displaced creatures will need to find someplace to “hotel” while this development occurs; many will not survive. In the final DEIS, Micron should significantly increase the ratio of replacement wetlands to lost wetlands and put a plan in place for incremental destruction of wetlands and aggressive development of replacement environments.

Another land use concern is related to increased flooding risks across the US resulting from climate change. Loss of wetlands and construction of acres of hard surfaces at the Micron site will increase flooding and runoff into the Oneida River and ultimately into Lake Ontario. In light of this, the DEIS should include an assessment of increased flooding risks to downstream communities and address how these risks will be mitigated.

Energy use – Operating the Micron plant will require enormous energy inputs. The DEIS doesn't address how Micron will meet these needs and also meet its 100% renewable energy commitment. The final DEIS should provide a plan for generation or purchase of solar and wind power that will not rely on power already on the grid and being used by other customers and will not increase the cost of energy to households and other energy users. The final DEIS must also address the cost of any infrastructure changes needed to support its energy use in a way that ensures these costs will not fall to utility ratepayers or to New York State or Onondaga County taxpayers.

Water use – Operating the Micron plant will require enormous amount of water pulled from Lake Ontario. The final DEIS must address how these needs will be met and monitored while ensuring water availability and affordability to current users. The final DEIS must also address the cost of any infrastructure changes needed to support its water consumption in a way that ensures these costs will not fall to current customers or taxpayers.

Additionally, the DEIS does not adequately address: increased housing needs and costs (including the impact on current CNY residents), increased traffic and the investment needed in public transportation or increased public service demands.

If Micron is truly committed to CNY, it will ensure that all steps are taken to preserve the integrity of our environment and our community and will seek community engagement in all future decisions that impact our environment and community.

Thank you for the opportunity to comment

Deborah Rose
dcurryrose@gmail.com
110 Kensington Pl, Syracuse NY 13210
Syracuse, New York 13210

Archived: Thursday, August 14, 2025 1:41:29 PM

From: betsywebster0@gmail.com

Mail received time: Mon, 11 Aug 2025 23:35:35

Sent: Monday, August 11, 2025 7:35:36 PM

To: chipsnepa

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
- **Greenhouse Gases:** The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar –and without relying on renewable energy credits or using renewable energy that is already on the grid – to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,

betsywebster0@gmail.com

14230, Nc Highway 801

Mt Ulla, North Carolina 28125-7721

Archived: Thursday, October 16, 2025 9:58:15 AM

From: [Jennifer Hok](#)

Mail received time: Mon, 11 Aug 2025 23:39:37

Sent: Monday, August 11, 2025 7:39:37 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York.

First of all, I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking for this extension.

Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- PFAS contamination and cleanup responsibilities - PFAS are a class of emerging contaminants that are not yet routinely monitored in the environment and that have high potential to cause adverse ecological or human health effects on workers and those downstream of this project. Thousands of chemicals in this class have not yet been adequately identified and analyzed, and PFAS are essential in current semiconductor manufacturing. Will Micron take responsibility for keeping New York soils and waterways clean for posterity? Who will cover the costs for as-yet-unknown possible cleanup and mitigation of these thousands of "FOREVER CHEMICALS"?
- There are numerous other concerns also in need of more than a 45-day public review and in need of more analysis:
 - water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds)
 - habitat loss
 - worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production
 - how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions
 - analysis of how to ensure that Micron's massive energy and water use will not affect the affordability of energy and clean water AND ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of

this project.

-meaningful access to workforce development, training, jobs, and career advancement for those in the Clay community

-the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities.

-availability of affordable housing for existing residents

Thank you for your consideration of my comments. Please extend the review period!

Sincerely,

Jennifer Hok

Jennifer Hok

jennyhok@hotmail.com

4940 Skyline Drive

Syracuse, New York 13215

Archived: Thursday, August 14, 2025 1:41:39 PM

From: [Saran K.](#)

Mail received time: Mon, 11 Aug 2025 23:46:12

Sent: Monday, August 11, 2025 7:46:13 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does NOT give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
- **Greenhouse Gases:** The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar –and without relying on renewable energy credits or using renewable energy that is already on the grid – to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,

Saran K.

sarank@mac.com

1710 Bagley

Los Angeles, California 90035

Archived: Thursday, August 14, 2025 1:41:44 PM

From: [Analyse Adams](#)

Mail received time: Mon, 11 Aug 2025 23:46:50

Sent: Monday, August 11, 2025 7:46:52 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York.

Based on my current understanding of the DEIS, I want to highlight environmental concerns which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- **Topography:** The proposed site for the project lays atop a karst landscape. It is important that Micron addresses how they plan on preventing damages to the facility given that the landscape is prone to issues such as sinkholes and cave formation. In addition, with karst regions being particularly important to groundwater, Micron needs to address how it plans to prevent any wastewater from contaminating the ground water in the area.

- **Wastewater Treatment:** In the DEIS, there was little to no explanation on which chemicals will be used in the facility. This is a problem because should an emergency occur, the community will not be aware of what chemicals Micron needs to be held accountable to clean. In addition, regarding PFAS, while not at the scale conducive for a large company, such as Micron, the company needs to make the commitment to invest in PFAS destruction technology that will assist in the removal of things forever chemicals are known to be detrimental to human health.

- **Water Usage:** I think it is absolutely appalling that Micron needs to use such a significant amount of water. The company needs to justify the use of water, as it is obviously disregarding how that will create a strain in the community of Clay, in addition to region. Micron also needs to address whether they've explored alternatives ways to meet their water needs than simply extracting it out of the local infrastructure and Lake Ontario.

- **Wetlands:** In DEIS, Micron said it'd replace two acres of wetlands for every one acre destroyed, resulting in at least 400 acres of new wetlands in Oswego county. That proposition is beyond ridiculous as the affected area is in Onondaga county. The animals that will be displaced will have no way of knowing that a new set of wetlands will be in Oswego county. In addition, Micron has made no effort and needs to engage with the community to inform them of who will be in charge of this effort. Lastly, Micron needs to address what will happen to the animals impacted as wetlands cannot be developed overnight and their

replacement sites will need to time to get anywhere close to the biodiversity of the original wetland that they intend to destroy.

Thank you for your consideration of my comments.

Sincerely,
Analyse Adams

Analyse Adams
analyseadams@gmail.com
1986 Turnpike Road
Auburn, New York 13021

From: Rocco Liuzzi <noreply@adv.actionnetwork.org>
Sent: Monday, August 11, 2025 7:51 PM
To: chipsnepa
Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

CHIPS Program Office CHIPS Program Office,

I am in favor of the Micron plant, this area needs an economic boost. However, I am deeply concerned about PFAS and all related fluorocarbons. How will you filter these? What level of residue will remain? Can you give an estimated contamination of the effluent in terms of PPB? I await your reply.

Rocco Liuzzi
roccoliuzzi8@gmail.com
4637 S. ONONDAGA ROAD
Nedrow, New York 13120

From: Ariel Ash <noreply@adv.actionnetwork.org>
Sent: Tuesday, August 12, 2025 12:50 PM
To: chipsnepa
Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

CHIPS Program Office CHIPs Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.

- Greenhouse Gases: The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar –and without relying on renewable energy credits or using renewable energy that is already on the grid – to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,

Ariel Ash

arieashj7@gmail.com

319 Darrow Ave

Syracuse , New York 13209

From: Denise Speicher <noreply@adv.actionnetwork.org>
Sent: Sunday, July 20, 2025 2:09 PM
To: chipsnepa
Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

CHIPS Program Office
CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.

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Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

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Thank you for your consideration of my comments.

Sincerely Denise & Mitch Speicher, Syracuse

Denise Speicher
dspeicher86_8@yahoo.com
264 Boston Street
Syracuse, New York 13206

From: Bryan Bradford <noreply@adv.actionnetwork.org>
Sent: Monday, July 21, 2025 1:53 PM
To: chipsnepa
Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

CHIPS Program Office CHIPS Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.

- Greenhouse Gases: The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar –and without relying on renewable energy credits or using renewable energy that is already on the grid – to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,

Bryan Bradford

bryanbradford25@gmail.com

104 Eton Ln

Manlius, New York 13104

From: Sari Fordham <noreply@adv.actionnetwork.org>
Sent: Monday, July 21, 2025 1:31 PM
To: chipsnepa
Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

CHIPS Program Office CHIPS Program Office,

I'm glad to respond to the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York.

As a mom, I'm concerned about what chemicals Micron will use and how they will dispose of them. I'm particularly worried about forever chemicals. What is Micron's plan to avoid polluting our water, soil, and air?

I'm also worried about renewable energy. Climate change is humanity's biggest challenge. What is Micron's plan for powering their plant? Will they use 100% renewable energy? Are they building solar or geothermal or wind? The public needs to know.

Finally, what is Micron's plans for restoring the wetlands they are destroying? These are not only important for ecological reasons, but also prevent flooding. The public needs to know how Micron will invest in the environment.

I'm looking forward to hearing the answers to these questions.

Sincerely,

Sari Fordham
contact@sarifordham.com
104 Eton Lane
Manlius, New York 13104

From: Marni Libby <noreply@adv.actionnetwork.org>
Sent: Monday, July 21, 2025 5:29 PM
To: chipsnepa
Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001

CHIPS Program Office CHIPs Program Office,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.

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Affordable and abundant water and energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of my comments.

Sincerely,

Marni Libby

mlibz936@gmail.com

218 Kensington Pl

Syracuse, New York 13210

From: Cindy Taren <cmt3155@live.com>
Sent: Monday, July 28, 2025 12:24 PM
To: CHIPSNEPA@chips.gov; Comments.Micron2025@dec.ny.gov
Cc: economicdevelopment@ongov.net
Subject: [EXTERNAL] public comment related to Micron fab proposed in Clay
Attachments: comment for Micron write in period.docx

Please see the attached comments on DEC permit applications for the Micron Semiconductor Facility and the DEIS. These comments are in response to BOTH the DEC permits AND the DEIS. My contact information is in the attached document.

Cindy Taren

Cindy Taren

1641 County Highway 13

New Berlin, NY 13411

cmt3155@live.com

315-404-1664

July 28, 2025

RE: Comments on Micron Semiconductor Facility DEIS (Clay, NY)

To Whom It May Concern,

I am submitting these comments regarding the Draft Environmental Impact Statement (DEIS) for the proposed Micron semiconductor fabrication facility in Clay, NY. While I reside approximately 80 miles from the site, the scale of this project raises significant concerns about its regional impacts, including effects on wetlands, water resources, pollution, and downstream communities like Pittsfield. Below are my key questions and comments for the record:

1. Wetland and Habitat Destruction

The DEIS acknowledges the permanent loss of **193 acres of federal wetlands** and **6,283 linear feet of surface water features**, with mitigation proposed at a 2:1 ratio. However:

- How will the mitigation sites be monitored and enforced to ensure ecological equivalence, especially given the irreversible loss of existing wetland functions (e.g., flood control, species habitat)?
- What safeguards are in place to protect federally listed species (e.g., Indiana bat, northern harrier) during and after construction, given the acknowledged "unavoidable" harm to their habitats?

2. Water Resource Strains

The project's water demand and wastewater discharge pose risks:

- How will Micron ensure that wastewater containing **chemical toxins** (e.g., PFAS, heavy metals) from semiconductor manufacturing will not contaminate groundwater or downstream communities?

3. Air Quality and GHG Emissions

While the DEIS states compliance with air quality standards, the project's "**unavoidable**" **GHG emissions** conflict with New York's CLCPA goals:

- How will Micron's "significant adverse effects on climate change" be reconciled with state mandates?
- Will the promised renewable energy credits (RECs) actually reduce regional emissions, or merely offset them on paper?

4. Cumulative Impacts on Surrounding Communities

While the DEIS acknowledges the project's growth-inducing effects, smaller communities like mine—though potentially benefiting from economic spillover—**may lack the financial capacity to absorb sudden strains** on housing, infrastructure, and public services. For example:

- How will Onondaga County coordinate with surrounding towns to ensure **equitable distribution of tax revenues** or state/federal aid to offset costs (e.g., road maintenance, school enrollment surges, emergency services)?

- What mechanisms (e.g., regional task forces, Micron-funded grants) will be implemented to help smaller communities **plan for and manage growth** without overextending local budgets?

The DEIS assumes local governments can adapt, but many lack resources for proactive planning. Clear commitments from OCIDA and project partners are needed to prevent smaller towns from bearing disproportionate burdens.

5. Transparency and Long-Term Accountability

- How will the public access real-time data on pollution, water usage, and mitigation progress?

- What financial assurances (e.g., bonds, penalties) will Micron provide to cover future remediation costs if environmental harm occurs?

I urge the agencies to:

1. **Strengthen mitigation requirements** for wetlands and species impacts, with independent oversight.

2. **Mandate stricter pollution controls** for wastewater and air emissions, including zero-discharge standards for hazardous chemicals.

3. **Expand the environmental justice analysis** to include downstream communities like mine, which may face indirect burdens.

4. **Require a phased construction review** to reassess impacts at each stage, rather than relying on upfront projections.

5. **Create a dedicated conservation area** of equal or greater size (e.g., 250+ acres) within the region, with comparable hydrologic and ecological features to the lost wetlands.

- Partner with local environmental organizations to **permanently protect and restore** this land as a refuge for displaced species (e.g., bats, grassland birds) and a carbon sink.

- Publicly commit to this mitigation upfront**, with transparent monitoring, to demonstrate responsiveness to community concerns about environmental trade-offs.

This would not only address ecological damage but also build trust with residents who fear the project's legacy will be purely industrial. The **permanent loss of 193 acres of wetlands and critical wildlife habitat** demands proactive, compensatory conservation.

This project must not prioritize economic gains over irreversible ecological harm. Thank you for considering these concerns. I request written responses to my questions and notification of any revisions to the DEIS.

Sincerely,
Cindy Taren

From:**Mail received time:** Wed, 6 Aug 2025 01:24:28**Sent:** Sender: Sender; bh=/eKP5s7rOKxKQBS/l253Y1irveovPxDMKSO97xCm1No=; b=XGRJiG7Er6xDn37fpEHN6esl0fNqyZhGkWpi6Ybd5+1bZt9tiAirR1XRvSkQ2ouS/lbCnBVf2z u37ntsqrXZjL+3i5Cl/GD8lxsMIELKpeDGh+aQTe+cT8ga7IC9CLroz5hlgxcYwmgMPcWVFrVOe NKchydKNAaljv5j0ExaEs=X**To:** [chipsnepa](#)**Subject:** [EXTERNAL] Micron Project Draft Environmental Impact Statement**Importance:** Normal**Sensitivity:** None**Archived:** Thursday, August 7, 2025 1:29:00 PM

Dear Onondaga County Industrial Development Agency,

I am writing to express serious concerns about the Draft Environmental Impact Statement (DEIS) for the proposed Micron semiconductor facility. As one of the largest industrial developments in New York State's history, this project must be held to the highest standards of environmental responsibility and public health protection.

Micron must commit to phasing out the use of all PFAS chemicals and prioritizing safer, non-toxic alternatives wherever technically feasible. Numerous other companies in the semiconductor industry have already adopted effective substitutes to PFAS chemicals. The DEIS should ensure full transparency on the presence and use of PFAS at the manufacturing facility. The public has a right to know if toxic PFAS chemicals may be used and discharged into their environment.

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Micron has the opportunity to be a leader in sustainable technology and corporate responsibility. I urge you to strengthen the final EIS to reflect meaningful action on limiting PFAS, pretreating wastewater for PFAS chemicals, protecting wetlands, and maximizing clean, local renewable energy solutions.

Sincerely,

Ms. Kristina Winter

161 Oakland Ave Miller Place, NY 11764-3406

kristinawinterdesigns@gmail.com

From:**Mail received time:** Wed, 6 Aug 2025 01:32:44**Sent:** Sender: Sender; bh=NeRzqGQi7AyXvo5Ge4okPlyQiX8TsWwUiMfwT6mqrA8=; b=Pk05dqg0lgh/ZcppZmAFyZKjS+n74xBrJf3SXJAI1fXVbRBC4dnLrzxaMrtAHdaq7UJvZnliKgQ NCQ4SI9JUvQFXhc9TAqFuB4xx2Qh/FL/qKuo7z0Xm+NTz5yHGcN0MhrSVwT8I760LBUR/N3D B7SXsAQK0K3sIY9PfgNdN1dw=X**To:** [chipsnepa](#)**Subject:** [EXTERNAL] Micron Project Draft Environmental Impact Statement**Importance:** Normal**Sensitivity:** None**Archived:** Thursday, August 7, 2025 1:29:24 PM

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Sincerely,

Ms. Barbara Harrison

143 Westview Ln Ithaca, NY 14850-6262

bharrison0921@gmail.com

From:**Mail received time:** Wed, 6 Aug 2025 01:33:04**Sent:** Sender: Sender; bh=pNrDaeSDKH7XGzQc4I0g5d7zxVDQbElrE12P8SiegwE=; b=UDLmHHwt5OtUWeCDgJDsnNtdXMmeC8DVLi9fqNgtl0/h/NBjKc4emT5G+upZ5BrSGaUYC Q8f56DpVr0+ggmBM3JZBE/+OZmmmMMJA3MOwOol+VsomsOoPoXON/DdVI2x29zuEQ810n CghAnKE+39fHXzunooqG+Zlvt2VN1imig=X**To:** [chipsnepa](#)**Subject:** [EXTERNAL] Micron Project Draft Environmental Impact Statement**Importance:** Normal**Sensitivity:** None**Archived:** Thursday, August 7, 2025 1:29:27 PM

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Sincerely,

Ms. Sharon Wiles

1302 Stratford Rd Schenectady, NY 12308-2414

slwiles.1@gmail.com

From:**Mail received time:** Wed, 6 Aug 2025 01:33:21**Sent:** Sender: Sender; bh=wU71zwC80SMNC4HbELxHIQ4ddpABZJUzd5sAsaDztQg=; b=lasyxzJFOhrTpldJUA0khiA2WLjVlojpFqoN+K34kz9mDUsfC6PoooAqwWg6eLmeMAHVRqZmIT33RKOL3ps/j0uy+AbUacNPssLqIGqDzHrczzlBuyBaR9VvOgNX28e+wHjGqs6NO1zGMzPd z+thkFPhQBbcUdwHeltk6rs88qM=X**To:** [chipsnepa](#)**Subject:** [EXTERNAL] Micron Project Draft Environmental Impact Statement**Importance:** Normal**Sensitivity:** None**Archived:** Thursday, August 7, 2025 1:29:30 PM

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Sincerely,

Mrs. Susan Goldman

47 Windmill Dr Huntington, NY 11743-3022

susangoldman@verizon.net

From:**Mail received time:** Wed, 6 Aug 2025 01:33:40**Sent:** Sender: Sender; bh=shBmmE4fVjovXxlQYszwLkQUw2I3kaEjNjUHXgMdTzl=; b=hkuA32YEBERG01PidvWRI54f0ziM8KfAoK1snfm0M6s31Kbh5Gyhdv9/liQFy20gYBbHBjAPI XzeeqquM0MwBxy00vI6ffV+4EkQFotuhvTON3vL5uCoOaRSWQfewD0MfDkaS96vRWi/wigH96 YV0nrcoJyFf9KZQOig95RMoNA=X**To:** [chipsnepa](#)**Subject:** [EXTERNAL] Micron Project Draft Environmental Impact Statement**Importance:** Normal**Sensitivity:** None**Archived:** Thursday, August 7, 2025 1:29:34 PM

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Sincerely,

Miss Paige Carman

3520 Stratford Rd Wantagh, NY 11793-3015

paigecrunch@yahoo.com

From:**Mail received time:** Wed, 6 Aug 2025 01:37:54**Sent:** Sender: Sender; bh=C2uGPFYOOI/LtbbAGf8t53DcN7h5em06Yoi1aKrWSy4=; b=nYhBiyFQHtlhZCWTfvIj9zqzs4WYjFRZUL0ODyff662nbp5FbZtuyi+5mucsTnfaa0kqn4yY8AnY AFoMtrvxRj3TKpBfuxVPTOrlv gyn/GfNR4ZLtyARORk6pE4VBgJN1mYUzpwWPhkM/C1xsOPIZ 5crupKOk/sC0Fci6yLsNpl=X**To:** [chipsnepa](#)**Subject:** [EXTERNAL] Micron Project Draft Environmental Impact Statement**Importance:** Normal**Sensitivity:** None**Archived:** Thursday, August 7, 2025 1:29:37 PM

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Sincerely,

Ms. Michele Krause

88 Glenna Little Trl Huntington, NY 11743-1926

michelekrause88@gmail.com

From:**Mail received time:** Wed, 6 Aug 2025 01:48:55**Sent:** Sender: Sender; bh=4Qh2N15o2g7mxv2spu3O1BiX8+9qwO3UECPskslQRtE=; b=Znb0dayHSeM8LbuL+Vys+reBqEqYLF0FAceIXNjXDTZbisEsG1jTpCLXk7fQ38gjtrKL77pKpYyvQZwtY12oH2t2Uwhk0BQeYU8ejxpPzzoDhVaQXLtrtcjUTt3/miFeD4DbIJPeYwzqVueG+sCd+nJISqwTBmlio9yq3afsM5l=X**To:** [chipsnepa](#)**Subject:** [EXTERNAL] Micron Project Draft Environmental Impact Statement**Importance:** Normal**Sensitivity:** None**Archived:** Thursday, August 7, 2025 1:29:40 PM

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Sincerely,

Mr. Kevin Ascher

26 Leonard St Mount Kisco, NY 10549-2914

kdascher@gmail.com

From:**Mail received time:** Wed, 6 Aug 2025 01:51:21**Sent:** Sender: Sender; bh=UDDi0DXfzYkMPBYwrfLnt2TOI2rNbKoYZDkHmMTTYk0=; b=bktoKYL3AdXsf8IOMX8CTQyjCb5aSvAwSWttbe+aoZODknjM/M7I9TDIBIHgLPf5GGR3JUu8B3rh5d8/0PkCAVL2dTYawxe9g5nnUNmmXnxHD95DqslJRJ6Xei/ohjJ6ufA37ijdRK17sIH6niFa0P3gj98wYsy3WDP5zAH0w=X**To:** [chipsnepa](#)**Subject:** [EXTERNAL] Micron Project Draft Environmental Impact Statement**Importance:** Normal**Sensitivity:** None**Archived:** Thursday, August 7, 2025 1:29:43 PM

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Sincerely,

Mr. Ryan Johnson

211 N Ocean Ave Patchogue, NY 11772-2005

ryan.p.johnson198115@gmail.com

From:**Mail received time:** Wed, 6 Aug 2025 01:58:10**Sent:** Sender: Sender; bh=oSkGsOs7OeuE1F2ZTcRcoT7YRV1el/y1u/CwfEu9ujk=; b=p0Hu8ovy5E6RuxRYjKHWn/Rg/4GYx+X5t/gsdNaEdgKUhbLVl5la2RrX5CoL8aUpbgv3J9aU DxHd8MbnRp1HD3whBVVeGSim4LbIEZCc0FwhLxzkwPFjLhFWBYBnLZ7eSq3jck8FSdkFvTQ Db1fKZvKE6u1YJUsm+6bl7RL5zZA=X**To:** chipsnepa**Subject:** [EXTERNAL] Micron Project Draft Environmental Impact Statement**Importance:** Normal**Sensitivity:** None**Archived:** Thursday, August 7, 2025 1:29:46 PM

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Sincerely,

Miss dee buttimer

101 Endres Dr Apt 10 Mattydale, NY 13211-1132

deettdbuttimer@gmail.com

From:**Mail received time:** Wed, 6 Aug 2025 02:00:43**Sent:** Sender: Sender; bh=oWmHaBiJxQrmgKx3kzPaphjl2gmgz6FP3xYeFs+QRd4=; b=mJ5FKjJivERygZ8VxOf7cufV0RQk0zybW24psrGq7cBuxRN3ngPgPczesuMpwY87kOcWCN ZDXrztUEokAUruBiP0FDmypoRcjgBFYcN0S0+bxT6XfcQm5NxjySMvqgaGD+642TbPo91CLo7U o5tpUGK+2WW1JXvyNISkflw10mY0=X**To:** [chipsnepa](#)**Subject:** [EXTERNAL] Micron Project Draft Environmental Impact Statement**Importance:** Normal**Sensitivity:** None**Archived:** Thursday, August 7, 2025 1:29:49 PM

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Sincerely,

Ms. Katherine Drouin-Keith

14 Marlowe Pl Greenlawn, NY 11740-2724

cinnabuster@yahoo.com

From:**Mail received time:** Wed, 6 Aug 2025 02:03:12**Sent:** Sender: Sender; bh=ksqC35TUsdebXov6Etem1rmbG0orcCG0vccps9hZyX4=; b=F/oREtH6WXgrFeld6OaQ0thrwi+fq/5RYCYYNqe5ds2CGn10y3Qktpv0TEzNps6OXBe1q57vStJTbLayozoW3Hh2Fp8bgdcJLApmo2155/rs1iVb3/ApKo8Jsb9Zey5+YN33uCf/p5OLhdJ1OmL5l2nu4H19P6knk2hqPuKeu6k=X**To:** [chipsnepa](#)**Subject:** [EXTERNAL] Micron Project Draft Environmental Impact Statement**Importance:** Normal**Sensitivity:** None**Archived:** Thursday, August 7, 2025 1:29:52 PM

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Micron has the opportunity to be a leader in sustainable technology and corporate responsibility. I urge you to strengthen the final EIS to reflect meaningful action on limiting PFAS, pretreating wastewater for PFAS chemicals, protecting wetlands, and maximizing clean, local renewable energy solutions.

Sincerely,

Ms. Doreen Tignanelli

29 Colburn Dr Poughkeepsie, NY 12603-5103

doreentig@aol.com

From:**Mail received time:** Wed, 6 Aug 2025 02:14:08**Sent:** Sender: Sender; bh=HbVoRk3cfR8AsPKkdJ05PbpCNH+xbVcLQv2Arlss47M=; b=NCKMaletbnH9TgLy6fo+jN1IM/pxrf9zPHc4bwj6UZcFQ45bmHIQaM2rwaKRw6bfvMbl+mkvFhmWUyPw37rgroermMhGCU3q2DYa9osWAWoLnot+/i2jT4IOOSHA2NuigoCuU5oDYJYkxDunWWcsdb4qTp93a37FLFq8RNOyac=X**To:** [chipsnepa](#)**Subject:** [EXTERNAL] Micron Project Draft Environmental Impact Statement**Importance:** Normal**Sensitivity:** None**Archived:** Thursday, August 7, 2025 1:29:56 PM

Dear Onondaga County Industrial Development Agency,

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It is my opinion that all of the concerns I have would be dramatically reduced if the size of the project were to be reduced from four fabs to two. Thank you.

Micron has the opportunity to be a leader in sustainable technology and corporate responsibility. I urge you to strengthen the final EIS to reflect meaningful action on limiting PFAS, pretreating wastewater for PFAS chemicals, protecting wetlands, and maximizing clean, local renewable energy solutions.

Sincerely,

Mr. Hubert Kimball

8223 Dexter Pkwy Baldwinsville, NY 13027-1036

contlr14@aol.com

From:**Mail received time:** Wed, 6 Aug 2025 02:17:09**Sent:** Sender: Sender; bh=GQZ73zZII75mWqkxASVbKIDTfUHk/tq7+pFVdiXnDO8=; b=QScUEBGi6NxtcRRvXkVrmH1dGXRurfnX74y4z5SIO5e207iBIVyMsFPEmF3QUriqni1GZWZ024nJ1X3SFPCbV/13pzKqdlBaYV9AkGVRh1kac2WkCUvDDYI7nf1An89TPbMH36Vs+u8KxB9Y2EMvTrLjlgwmfsl3mylYjUHxtPo=X**To:** [chipsnepa](#)**Subject:** [EXTERNAL] Micron Project Draft Environmental Impact Statement**Importance:** Normal**Sensitivity:** None**Archived:** Thursday, August 7, 2025 1:29:59 PM

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Sincerely,

Mrs. Jen Horowitz

55 Bonnie Meadow Rd NY10583 Scarsdale, NY 10583-6501

jenhorowitz3@gmail.com

From:**Mail received time:** Wed, 6 Aug 2025 02:25:54**Sent:** Sender: Sender; bh=3D2F7CkqxkeS7jehKQGt670OYN2VfUQumVOYpiCbZs4=; b=U7tx3AWF8gUgvUlf7FQb7SZzUdVehA+pYpg3B+Qh3AepvFebGE4NQQqbZtH92VE852xtLTp0mkYm7G2l4e35eNDnhdTHqTW7UX0IllaZfxOfiq6iho2MDagk3rdDk7rbh55qXgxBI+Ra0sDI/3wPN7myJR3TB1+h7RKrXN0pBk=X**To:** [chipsnepa](#)**Subject:** [EXTERNAL] Micron Project Draft Environmental Impact Statement**Importance:** Normal**Sensitivity:** None**Archived:** Thursday, August 7, 2025 1:30:03 PM

Dear Onondaga County Industrial Development Agency,

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Sincerely,

Mr. BARRY FRANKEL

731 Preston Rd East Meadow, NY 11554-4533

ibfive@aol.com

From:**Mail received time:** Wed, 6 Aug 2025 02:44:23**Sent:** Sender: Sender; bh=P0pCL1vTnL+9a7+qmXtnzJBe0Zjt8qpJLFtbFNLNrE0=; b=qOXvLDwZlp07Hkm42iWsBRuEXRv2Pms4akvdZExqFLc4IeDEpwuxMrN4mEseuhIB7cHfDVwnqvHmtvZLka7kKzyNAjXK/6GweVhUdxunYAan0LQnqX5KxznIbjUvXnHfOCobcRgzak9AKitm oFKkq3C41xZnfdcJWi9eaM2ZnOk=X**To:** chipsnepa**Subject:** [EXTERNAL] Micron Project Draft Environmental Impact Statement**Importance:** Normal**Sensitivity:** None**Archived:** Thursday, August 7, 2025 1:30:06 PM

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Sincerely,

Miss Evelyn Ulex

51 Fairmount St Huntington, NY 11743-3504

ulex29@gmail.com

From:**Mail received time:** Wed, 6 Aug 2025 02:54:02**Sent:** Sender: Sender; bh=yNbxnHOBfDJufHkJKn+uiSNGvmKsdq4c3gKzdDu3kNc=; b=m0NIMr5K2R/MHUTgVgxrzaQCGkOCqUmwyikhymV40kPrPVI0c4vUI0ImgvkmVTIsMt0Lv9R+wQGIMiIVD6IWzyKX5eNU5A9Ip7192VUWb4Qi9KXv3/RIm3Srbg+xtf4YJisB3daovOu1arkgajyewXd0NuhxVcbqRsBx+zLoIWU=X**To:** [chipsnepa](#)**Subject:** [EXTERNAL] Micron Project Draft Environmental Impact Statement**Importance:** Normal**Sensitivity:** None**Archived:** Thursday, August 7, 2025 1:30:09 PM

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Sincerely,

Ms Kelly DeVine

119 Jayne Ave Port Jefferson, NY 11777-1328

kdevine4407@gmail.com

From:**Mail received time:** Wed, 6 Aug 2025 02:55:22**Sent:** Sender: Sender; bh=HvyGVFL0ylgtgTbkfiol36SzfSURmxLTYUYIDATDWz4=; b=FCPBWTmQ0ZtH8M+CfZOqd/+Gu/flqvqX5VO5YxkkyPVYUsJYhNCag2KQJuYT2ZxSG7vY1p1MQDtIznYqggK0DnZDpWbS5zWMuMFGSY5A6VIkXB7n+flMOrF66gYFT+YsarH/QvDLda/tP50xk1qUDJW6KDdlIDHH6oDVQxAmNY0=X**To:** chipsnepa**Subject:** [EXTERNAL] Micron Project Draft Environmental Impact Statement**Importance:** Normal**Sensitivity:** None**Archived:** Thursday, August 7, 2025 1:30:12 PM

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Sincerely,

Ms. Donna DiGioia

9 Leaside Dr Great River, NY 11739-3014

ddigioia@aol.com

From:**Mail received time:** Wed, 6 Aug 2025 03:04:04**Sent:** Sender: Sender; bh=agSnDggAxjZVt3YGEum6IVyBp3q92UAJW1qnb7SgIf4=; b=V6p8r8J+Eu+INwTIktlubOuNS6Ult5m5uvBSopl5zSCPHPVlhDy+INLFRvd/m3y+Frk1Jv93IFt hSAw/8nPW9LE4iN1LZKDq+bSmyDVG2KmxwEDAIEaKWeaban6AFHr0ViYlpJIEF+GVM6yAh 8nUJSz+D5NoyA8a6z3skxllt4=X**To:** chipsnepa**Subject:** [EXTERNAL] Micron Project Draft Environmental Impact Statement**Importance:** Normal**Sensitivity:** None**Archived:** Thursday, August 7, 2025 1:30:15 PM

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Sincerely,

Dr. Natalia Nikushkina

314 Avenue P Brooklyn, NY 11204-4121

raptors.foggier-7m@icloud.com

From:**Mail received time:** Wed, 6 Aug 2025 03:10:51**Sent:** Sender: Sender; bh=tZXXJ3Z6lyEP+WP8yg9oa+Elcj7LAP34UBFL003tNvY=; b=V5oAScwmCnuEAHLrO/VM1gKc2KZzjKP2apLZTwbbVRpl7r2vaq7zl4g2alPSOwP/NmtRFtH GyXnygZI77N8BICu8f7uaC0KAP1IldUYoEjAD9Rt6LgSLsu8Vja4c5Zfu3fkjra6Xjx0AWilmxww4L/ IYIVBv0RRadOsNtheXjBE=X**To:** [chipsnepa](#)**Subject:** [EXTERNAL] Micron Project Draft Environmental Impact Statement**Importance:** Normal**Sensitivity:** None**Archived:** Thursday, August 7, 2025 1:30:17 PM

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Sincerely,

Mr. Michael Pittelli

3 Norma St East Northport, NY 11731-5020

mncpittelli@hotmail.com

From:**Mail received time:** Wed, 6 Aug 2025 03:12:29**Sent:** Sender: Sender; bh=cbLDyjBV4etE7ReccCkEYzSvTowqBQKaKWLBCupHf78=; b=nPcZr+Mu9jsP/eQ7s5PFoXZQ4l4vQTqBZe1/LmDzowHgrdQX5wLn8rd6NjigY4ReLDC34dZUWrFkLGcCspxl0I7u/WOvGhHxN0c5POHi/OeO4LqSMDrkrG71HKsL+RZIOfGWI/beSNKF2wRA9u2fO7sGFW2+gdRfXnh1YuogkeQ=X**To:** [chipsnepa](#)**Subject:** [EXTERNAL] Micron Project Draft Environmental Impact Statement**Importance:** Normal**Sensitivity:** None**Archived:** Thursday, August 7, 2025 1:30:20 PM

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Sincerely,

Mr. John Lazarek

12 Walnut Pl Lindenhurst, NY 11757-6334

nbmusicjl@aim.com

From:**Mail received time:** Wed, 6 Aug 2025 03:18:49**Sent:** Sender: Sender; bh=yBdRYEzGwZB/+TwErs55hQmJBrrkjoJQAVAIJMIPiws=; b=NNVIOHqdrq+DUy3sNvVNuoXIMNLI06frWC9UsaPr52vM18mGjbA7y0hI8SYYq0kpXLA+ISBu22eeN1bs/wgfVKmGL/PZ17xEubfYmB86t/CjD3xwttelb6qBbuj9xVjFZTVzjflLLJvKPP3sVrKOeAdC4OE/jSSq3crVG8JyG68U=X**To:** [chipsnepa](#)**Subject:** [EXTERNAL] Micron Project Draft Environmental Impact Statement**Importance:** Normal**Sensitivity:** None**Archived:** Thursday, August 7, 2025 1:30:23 PM

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Sincerely,

Miss Sheleeza Deen

14217 84th Dr Jamaica, NY 11435-2545

kadija706@gmail.com

From:**Mail received time:** Wed, 6 Aug 2025 03:44:41**Sent:** Sender: Sender; bh=xennCqRRJzXj1yrpCQ6odis7JR55P/v+MpYfuY0SG+l=; b=EnzX5y+d8Vzh/oRtjwHfWP0rvY1+C7EUcl/yvH+M52xWZNPxh5cMxxi+a6M+0u686wAE6Eo3pcBd+2nHj5mX17G1cV2cJX7/cU9mDe5mQuDwfvfbSL1JiSQH5z5hPZ2VDN5/m+k1JXR/xx9dPahho2RNIhpBQjjw4AU2jDrtvTs=X**To:** [chipsnepa](#)**Subject:** [EXTERNAL] Micron Project Draft Environmental Impact Statement**Importance:** Normal**Sensitivity:** None**Archived:** Thursday, August 7, 2025 1:30:25 PM

Dear Onondaga County Industrial Development Agency,

I am writing to express serious concerns about the Draft Environmental Impact Statement (DEIS) for the proposed Micron semiconductor facility. As one of the largest industrial developments in New York State's history, this project must be held to the highest standards of environmental responsibility and public health protection.

Micron must commit to phasing out the use of all PFAS chemicals and prioritizing safer, non-toxic alternatives wherever technically feasible. Numerous other companies in the semiconductor industry have already adopted effective substitutes to PFAS chemicals. The DEIS should ensure full transparency on the presence and use of PFAS at the manufacturing facility. The public has a right to know if toxic PFAS chemicals may be used and discharged into their environment.

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Micron must also go much further in maximizing on-site renewable energy generation. The proposed 4 megawatts of solar energy is a fraction of what is needed to power a facility of this scale. All viable rooftop, parking, and adjacent land areas should be evaluated for solar deployment, and geothermal energy options should be fully explored. Finally, I urge Micron to avoid relying on speculative new or advanced nuclear development to meet its energy needs. New nuclear power is costly, unproven in this timeframe, and carries long-term environmental risks. Clean, proven renewable technologies like solar, wind, and geothermal are the right path forward for this project and for New York's climate goals.

Micron has the opportunity to be a leader in sustainable technology and corporate responsibility. I urge you to strengthen the final EIS to reflect meaningful action on limiting PFAS, pretreating wastewater for PFAS chemicals, protecting wetlands, and maximizing clean, local renewable energy solutions.

Sincerely,

Ms. Gertrude Battaly

112 Chelsea Rd White Plains, NY 10603-1110

merlin@pipeline.com

From:**Mail received time:** Wed, 6 Aug 2025 03:49:28**Sent:** Sender: Sender; bh=etjq0aWK/yr2Jg2xpUvsNZsrkScMFnb9zD1cNI3DBVA=; b=ABmR+ampNeKN9j8flf0+ZDQnni4FWcoMxWFnEeT3HMjH3/bwV6FCDB8I4FNJVqCDxw3d4kaY9s+8JPKcRAawV4+LOxUc1NUMB97TEKxrARvbLCO/OZgbi960V7J4jiVak/LypOVIBTygytfXZa5oJVhb1cEzWt6IAy+s/1FJdLw=X**To:** [chipsnepa](#)**Subject:** [EXTERNAL] Micron Project Draft Environmental Impact Statement**Importance:** Normal**Sensitivity:** None**Archived:** Thursday, August 7, 2025 1:30:29 PM

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Sincerely,

Mr. Stephen Heinzelman

21 Farm Field Ln Pittsford, NY 14534-2863

sheinzel@gmail.com

From:**Mail received time:** Wed, 6 Aug 2025 03:51:08**Sent:** Sender: Sender; bh=UGk07Wmef7y8SSnYPnq6o1A6QnhKj4O5nGvie2957P4=; b=FWk4CYUsMsW2SoR7vgtuuNz1XpMPNBKgwQOI6M2AiBhzQc0Evcma06mFaqRv70S/6Smz2YKCufMgowgA8E8Fcw/hdlpvvz80yG9N0D+Pm4/SYfVCgh91mIE4MKpuj+gc+qlpwujxmpA ANlysPMcMW9TUi7yUEFuFXRgogCVPI=X**To:** [chipsnepa](#)**Subject:** [EXTERNAL] Micron Project Draft Environmental Impact Statement**Importance:** Normal**Sensitivity:** None**Archived:** Thursday, August 7, 2025 1:30:32 PM

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Sincerely,

Ms. Claudia Markovich

16 Spring Rd Huntington, NY 11743-3622

artasticdestination@gmail.com

From:**Mail received time:** Wed, 6 Aug 2025 04:02:14**Sent:** Sender: Sender; bh=SRgtUINvchWl9Zhi19AtSzEsVSyXNN2EmVkiQ0EK0=; b=oxe7jWo9neDyTPberLPMtRNYG5QvEjtuhdJoKAXelJ99hZF2ZmRpB9ZC43pLVjd5tMrq0eDb Gi1QmuELTIVJC3Lk7WpmLmJenB7DvMprCSciUMgM7xgBZ6t58PQYq6PSRKWuzlQIJ0jC+CJI Sm1G7PLCdbXDKjUvSwLv+Kf6aew=X**To:** [chipsnepa](#)**Subject:** [EXTERNAL] Micron Project Draft Environmental Impact Statement**Importance:** Normal**Sensitivity:** None**Archived:** Thursday, August 7, 2025 1:30:35 PM

Dear Onondaga County Industrial Development Agency,

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Sincerely,

Ms. Shannon M

249 Cambridge St Syracuse, NY 13210-2207

xxx@gmail.com

From:**Mail received time:** Wed, 6 Aug 2025 04:35:17**Sent:** Sender: Sender; bh=sa/q7Kfwd7eCj9VZLNJ6BMRtHTVtNjEyFVjGtR5SuGoE=; b=WiKAhxFJ9Wr9Nc2WF8zRdj0oRwhjDK3Cd5m3Y1uc86iul7Ql8h4bLmaoyOQfl6Eptzdg/117GgyzJGwqwFrDXa8kAO1PJ57Trgw7oTSK+pIY6wWYF0gXpKPc7KEnd9g8JGb0B/ab11kN4OKZQNivMjk65BaOCyF4EWe1pGsQTK=X**To:** [chipsnepa](#)**Subject:** [EXTERNAL] Micron Project Draft Environmental Impact Statement**Importance:** Normal**Sensitivity:** None**Archived:** Thursday, August 7, 2025 1:30:38 PM

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Sincerely,

Mr. Robert Towns

1530 Steele St Elmton, NY 11003-2430

rkt40@aol.com

From:**Mail received time:** Wed, 6 Aug 2025 06:00:29**Sent:** Sender: Sender; bh=8ppolHd5ovr3J+ZPHgyjO2LhzWMgovuFIBH981OMQjk=; b=fq8zFNRI98+yOUSxvpU/uEkhClwUy29V0yOkHkoCFqnUPFmTMBE8C+Ec97GOaII0XoSLUeWIYSU1EE11E/gU0LUwunZu82Bizkwu7rvK6pa1qRoCxtID8qYdJuDcJtk6pOGGOUE6gsaC19b1OVlee0kMnxrE6S3T1/qsLMG/k=X**To:** [chipsnepa](#)**Subject:** [EXTERNAL] Micron Project Draft Environmental Impact Statement**Importance:** Normal**Sensitivity:** None**Archived:** Thursday, August 7, 2025 1:30:41 PM

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Sincerely,

Dr. Joseph Muratore

7 Seward Ln Stony Brook, NY 11790-3108

jfmuratore18@gmail.com

From:**Mail received time:** Wed, 6 Aug 2025 06:02:28**Sent:** Sender: Sender; bh**To:** [chipsnepa](#)**Subject:** [EXTERNAL] Micron Project Draft Environmental Impact Statement**Importance:** Normal**Sensitivity:** None**Archived:** Thursday, August 7, 2025 1:30:43 PM

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Sincerely,

Mrs. Marguerite Clark

73 Third Ave Oswego, NY 13126-1824

clarkcny@yahoo.com

From:**Mail received time:** Wed, 6 Aug 2025 09:26:27**Sent:** Sender: Sender; bh=TzCiTYw4SEaYE0YTcXRRi/WrdWoBiRFy7sRIHgMMPug=; b=iy2MXeTw9Ce0IWpvWa0r4RK8xEiQktqNMQvB4DMt1Mb0L28ivGACFYVeDViW07GU4ObQzy/fhwAUJ7x+lzL17iBtt7irogG3gfbCESUWx3nJdxIOUESy00WDfr85zruN5wu7xCm1dge1NWVW3wOeMF2+lJZ/SPOyca8Q8BIDOn0=X**To:** [chipsnepa](#)**Subject:** [EXTERNAL] Micron Project Draft Environmental Impact Statement**Importance:** Normal**Sensitivity:** None**Archived:** Thursday, August 7, 2025 1:30:46 PM

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Sincerely,

Mrs. Jillian Kendrick

2681 Dunbar Woods Rd Marcellus, NY 13108-9703

mullje22@yahoo.com

From:**Mail received time:** Wed, 6 Aug 2025 11:09:38**Sent:** Sender: Sender; bh=OGEh14n4/UViX56M6qdb51ZSOblp6gPwuutBI+KkptM=; b=EKYn2kB6TfRJDC4ErOOdW6mGBD5SoW7oCg6JOFMT1rjvr+GKEifUtlr5ftUQ7sa2hg0N3ah pR6LhoVMgYX6D72dRliZj/g2mPMyK1Xodj/s7JMqx5Z950thljkKJmGJxrx8BB/H4rhBi1mX1OK DLva+wBfXNjgKz3n4LL7OT5A=X**To:** [chipsnepa](#)**Subject:** [EXTERNAL] Micron Project Draft Environmental Impact Statement**Importance:** Normal**Sensitivity:** None**Archived:** Thursday, August 7, 2025 1:30:49 PM

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Sincerely,

Dr. Michael Stinson

126 Hampshire Dr Rochester, NY 14618-2328

msserd@rit.edu

From:**Mail received time:** Wed, 6 Aug 2025 11:11:37**Sent:** Sender: Sender; bh=iALTiP93ZIAjZVBDBcwBxJQe6IHFp2p90+pTnIP5Gn0=; b=R1VSW9XpfKabZAYpZpz88FOQwOHkIMhvUU3OIwfVOOEGnL1RRf2AIWb6TMDs3iuBMKX bXUSzLh9a27brOzY41W0cTifil1F05aKLantyxVyo6zYWYaYcHs25pSxGjnbGda2ky1RSGvNGIe VGWzFTOfHREanizyMI8TyEJeU6wjM=X**To:** [chipsnepa](#)**Subject:** [EXTERNAL] Micron Project Draft Environmental Impact Statement**Importance:** Normal**Sensitivity:** None**Archived:** Thursday, August 7, 2025 1:30:52 PM

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Sincerely,

Mr Robert Goetz

19 Selden Dr East Northport, NY 11731-1341

goetz.robert@gmail.com

From:**Mail received time:** Wed, 6 Aug 2025 11:12:30**Sent:** Sender: Sender; bh=Bh07e7BB5yT/3D0kX6Qvw4BWFcby9nVLSA8sO94X17M=; b=eJg+g9xSq0ylf8Co/W6hD8l4VdrZJBdyl0q5tDpNO4NTj6m30LbsGk+klRn+DLOm1JYflbwbag Sru15QB3282WHPOhLSPeT5mLUMfsUc7hgRS/2fQuEVN9mcAzEHc/uMpwgh3hFlwkx2x2Ekex nEi2WzbSFnc4pT20pgUJG/MQ=X**To:** [chipsnepa](#)**Subject:** [EXTERNAL] Micron Project Draft Environmental Impact Statement**Importance:** Normal**Sensitivity:** None**Archived:** Thursday, August 7, 2025 1:30:55 PM

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Mrs. Linda Riordan

64 Woodbury Pl Rochester, NY 14618-3445

riordan.linda@gmail.com

From:**Mail received time:** Wed, 6 Aug 2025 11:40:29**Sent:** Sender: Sender; bh=31SdcRhnX4OyINIC02/Ccs1fqc4DO/1K+uHdwbUnKnQ=; b=PTAe+ZD9y9ole2t9+52HqNvGtDEuXTeM1ip9q4MavdkICrp+OGtLd1d/GeMpaOxtjzA77hLL vjpGLMIhyFpziOacnMqbBO/EGGre2IEP2z9ovOuw0zNXyyDy23eT+uGAsImky0Y4bJlxd/D53up TDeH5Y/UzKv4elzUjEyHiT8=X**To:** [chipsnepa](#)**Subject:** [EXTERNAL] Micron Project Draft Environmental Impact Statement**Importance:** Normal**Sensitivity:** None**Archived:** Thursday, August 7, 2025 1:30:59 PM

Dear Onondaga County Industrial Development Agency,

I am writing to express serious concerns about the Draft Environmental Impact Statement (DEIS) for the proposed Micron semiconductor facility. As one of the largest industrial developments in New York State's history, this project must be held to the highest standards of environmental responsibility and public health protection.

There are many obvious positives to Micron coming there have to be stronger regulations regarding PFAS and other environmental issues.

I live on Skaneateles lake and I understand the importance of protecting our water. It is a continuous effort on our part to keep Skaneateles clean and safe.

I also just had a very unnerving conversation with someone who happens to live in a different state but they have been told that they should not plant crops directly in this ground on their property because the lead levels in the ground are insanely high. They have been told this is the result of the paint on older houses chipping off that contained lead and the use of leaded gasoline in the past contaminating their Earth. They do not live in an industrial area. They live in a quiet, residential City area.

Please strengthen the requirements for Micron to protect our future generations now, before they start causing irreparable damage to our environment. The employment opportunities will be vast but don't make it at vast expense to the environment. And we only have one Earth.

Micron has the opportunity to be a leader in sustainable technology and corporate responsibility. I urge you to strengthen the final EIS to reflect meaningful action on limiting PFAS, pretreating wastewater for PFAS chemicals, protecting wetlands, and maximizing clean, local renewable energy solutions.

Sincerely,

Mrs. Diane Maguire

1059 The Ln Skaneateles, NY 13152-9604

maguire.diane@gmail.com

From:**Mail received time:** Wed, 6 Aug 2025 12:06:31**Sent:** Sender: Sender; bh=gPGVF6JJ2idUryovq+fgRGuKNVY5JBDdXP57K1Ue5A=; b=AKRMmlGqypw+Fv4iM+vsfYkLdAMi/kijV7yDSeKt3l8r1Yj5hJgSxRP91n3+4R/g83IMK0+hJ541wHjFkWRjPrFhpuMQkW1TklQXYUYTAhUV9lsZGSbQwLLL17tGMllg0hqIJNAdOJ6Z/8x0u+oQi1x/gKd+bRy4w513TeCM0l=X**To:** [chipsnepa](#)**Subject:** [EXTERNAL] Micron Project Draft Environmental Impact Statement**Importance:** Normal**Sensitivity:** None**Archived:** Thursday, August 7, 2025 1:31:02 PM

Dear Onondaga County Industrial Development Agency,

I am writing to express serious concerns about the Draft Environmental Impact Statement (DEIS) for the proposed Micron semiconductor facility. As one of the largest industrial developments in New York State's history, this project must be held to the highest standards of environmental responsibility and public health protection.

Micron must commit to phasing out the use of all PFAS chemicals and prioritizing safer, non-toxic alternatives wherever technically feasible. Numerous other companies in the semiconductor industry have already adopted effective substitutes to PFAS chemicals. The DEIS should ensure full transparency on the presence and use of PFAS at the manufacturing facility. The public has a right to know if toxic PFAS chemicals may be used and discharged into their environment.

Micron must also commit to an on-site pretreatment of wastewater to remove PFAS to the lowest technically achievable levels before discharge.

Additionally, the destruction of over 200 acres of wetlands and thousands of feet of stream systems is unacceptable, particularly in a region as water-rich and ecologically sensitive as Central New York. Wetlands provide essential services like water purification, flood mitigation, and habitat for wildlife. The proposed 2:1 mitigation ratio does not come close to replacing these losses of high value wetlands. The DEIS should require a minimum 10:1 mitigation ratio and prioritize restoration efforts near the impacted areas to preserve watershed integrity.

Micron must also go much further in maximizing on-site renewable energy generation. The proposed 4 megawatts of solar energy is a fraction of what is needed to power a facility of this scale. All viable rooftop, parking, and adjacent land areas should be evaluated for solar deployment, and geothermal energy options should be fully explored. Finally, I urge Micron to avoid relying on speculative new or advanced nuclear development to meet its energy needs. New nuclear power is costly, unproven in this timeframe, and carries long-term environmental risks. Clean, proven renewable technologies like solar, wind, and geothermal are the right path forward for this project and for New York's climate goals.

Micron has the opportunity to be a leader in sustainable technology and corporate responsibility. I urge you to strengthen the final EIS to reflect meaningful action on limiting PFAS, pretreating wastewater for PFAS chemicals, protecting wetlands, and maximizing clean, local renewable energy solutions.

Sincerely,

Mrs. Katherine Graham

6158 Pinion Dr Cicero, NY 13039-8866

kate.george90@gmail.com

From:**Mail received time:** Wed, 6 Aug 2025 12:29:54**Sent:** Sender: Sender; bh=Qg1nVJgFu3S4YrUlbTLfAjyn4vqYpJs9ldOTSeTDAXs=; b=cONHI5I2pNkpJwIVkOPVvLQFwo1RECZAN7Ukvv0IOabZReZ6gvqf+X2ZMb9F60Lqj9LfgjyY RlirqNyCs5/prbbHvgoDkvTvy+lusywUUcgou6woPQW51G4OSuDezzw2is3Lch7qLUrOryQhBJy FxwMAEp8BM6L+/LuH337TO0=X**To:** [chipsnepa](#)**Subject:** [EXTERNAL] Micron Project Draft Environmental Impact Statement**Importance:** Normal**Sensitivity:** None**Archived:** Thursday, August 7, 2025 1:31:05 PM

Dear Onondaga County Industrial Development Agency,

I am writing to express serious concerns about the Draft Environmental Impact Statement (DEIS) for the proposed Micron semiconductor facility. As one of the largest industrial developments in New York State's history, this project must be held to the highest standards of environmental responsibility and public health protection.

Micron must commit to phasing out the use of all PFAS chemicals and prioritizing safer, non-toxic alternatives wherever technically feasible. Numerous other companies in the semiconductor industry have already adopted effective substitutes to PFAS chemicals. The DEIS should ensure full transparency on the presence and use of PFAS at the manufacturing facility. The public has a right to know if toxic PFAS chemicals may be used and discharged into their environment.

Additionally, the destruction of over 200 acres of wetlands and thousands of feet of stream systems is unacceptable, particularly in a region as water-rich and ecologically sensitive as Central New York. Wetlands provide essential services like water purification, flood mitigation, and habitat for wildlife. The proposed 2:1 mitigation ratio does not come close to replacing these losses of high value wetlands. The DEIS should require a minimum 10:1 mitigation ratio and prioritize restoration efforts near the impacted areas to preserve watershed integrity.

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Please address these concerns for the health of all of us!!

Sincerely,

Jennifer Baron

Micron has the opportunity to be a leader in sustainable technology and corporate responsibility. I urge you to strengthen the final EIS to reflect meaningful action on limiting PFAS, pretreating wastewater for PFAS chemicals, protecting wetlands, and maximizing clean, local renewable energy solutions.

Sincerely,

Ms. Jennifer Baron

46 Willow Ct Manorville, NY 11949-3106

JenBaron222@gmail.com

From: ddpa74@everyactioncustom.com on behalf of David Amisano <ddpa74@everyactioncustom.com>
Sent: Wednesday, August 6, 2025 8:47 AM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Micron Project Draft Environmental Impact Statement

Dear Onondaga County Industrial Development Agency,

I am writing to express serious concerns about the Draft Environmental Impact Statement (DEIS) for the proposed Micron semiconductor facility. As one of the largest industrial developments in New York State's history, this project must be held to the highest standards of environmental responsibility and public health protection.

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Micron has the opportunity to be a leader in sustainable technology and corporate responsibility. I urge you to strengthen the final EIS to reflect meaningful action on limiting PFAS, pretreating wastewater for PFAS chemicals, protecting wetlands, and maximizing clean, local renewable energy solutions.

Sincerely,
Mr. David Amisano
271 Rockaway St Islip Terrace, NY 11752-1129 ddpa74@aol.com

From: filippinedehaan@everyactioncustom.com on behalf of filippine hoogland
<filippinedehaan@everyactioncustom.com>
Sent: Wednesday, August 6, 2025 8:59 AM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Micron Project Draft Environmental Impact Statement

Dear Onondaga County Industrial Development Agency,

I am writing to express serious concerns about the Draft Environmental Impact Statement (DEIS) for the proposed Micron semiconductor facility. As one of the largest industrial developments in New York State's history, this project must be held to the highest standards of environmental responsibility and public health protection.

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Micron has the opportunity to be a leader in sustainable technology and corporate responsibility. I urge you to strengthen the final EIS to reflect meaningful action on limiting PFAS, pretreating wastewater for PFAS chemicals, protecting wetlands, and maximizing clean, local renewable energy solutions.

Sincerely,
Mrs. filippine hoogland
36 Aspewtomg Rd Bedford, NY 10506
filippinedehaan@gmail.com

From: lantzhorn@everyactioncustom.com on behalf of janet lantz
<lantzhorn@everyactioncustom.com>
Sent: Wednesday, August 6, 2025 9:42 AM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Micron Project Draft Environmental Impact Statement

Dear Onondaga County Industrial Development Agency,

I am writing to express serious concerns about the Draft Environmental Impact Statement (DEIS) for the proposed Micron semiconductor facility. As one of the largest industrial developments in New York State's history, this project must be held to the highest standards of environmental responsibility and public health protection.

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Micron has the opportunity to be a leader in sustainable technology and corporate responsibility. I urge you to strengthen the final EIS to reflect meaningful action on limiting PFAS, pretreating wastewater for PFAS chemicals, protecting wetlands, and maximizing clean, local renewable energy solutions.

Sincerely,
Ms. Janet Lantz
268 Buena Vista Rd New City, NY 10956-2112 lantzhorn@gmail.com

From: sockpuppet@everyactioncustom.com on behalf of Melissa Chitwood
<sockpuppet@everyactioncustom.com>
Sent: Wednesday, August 6, 2025 9:56 AM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Micron Project Draft Environmental Impact Statement

Dear Onondaga County Industrial Development Agency,

I am writing to express serious concerns about the Draft Environmental Impact Statement (DEIS) for the proposed Micron semiconductor facility. As one of the largest industrial developments in New York State's history, this project must be held to the highest standards of environmental responsibility and public health protection.

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Micron has the opportunity to be a leader in sustainable technology and corporate responsibility. I urge you to strengthen the final EIS to reflect meaningful action on limiting PFAS, pretreating wastewater for PFAS chemicals, protecting wetlands, and maximizing clean, local renewable energy solutions.

Sincerely,
Ms. Melissa Chitwood
320 N Midland Ave Nyack, NY 10960-1525
sockpuppet@aol.com

From: birchlorne@everyactioncustom.com on behalf of Lorne Birch
<birchlorne@everyactioncustom.com>
Sent: Wednesday, August 6, 2025 10:04 AM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Micron Project Draft Environmental Impact Statement

Dear Onondaga County Industrial Development Agency,

I am writing to express serious concerns about the Draft Environmental Impact Statement (DEIS) for the proposed Micron semiconductor facility. As one of the largest industrial developments in New York State's history, this project must be held to the highest standards of environmental responsibility and public health protection.

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Micron has the opportunity to be a leader in sustainable technology and corporate responsibility. I urge you to strengthen the final EIS to reflect meaningful action on limiting PFAS, pretreating wastewater for PFAS chemicals, protecting wetlands, and maximizing clean, local renewable energy solutions.

Sincerely,
Mr. Lorne Birch
36 2nd Ave East Rockaway, NY 11518-1912 birchlorne@gmail.com

From: julslane111@everyactioncustom.com on behalf of Julia Lane <julslane111@everyactioncustom.com>
Sent: Wednesday, August 6, 2025 10:04 AM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Micron Project Draft Environmental Impact Statement

Dear Onondaga County Industrial Development Agency,

I am writing to express serious concerns about the Draft Environmental Impact Statement (DEIS) for the proposed Micron semiconductor facility. As one of the largest industrial developments in New York State's history, this project must be held to the highest standards of environmental responsibility and public health protection.

I am a public librarian, and I believe Micron must commit to phasing out the use of all PFAS chemicals and prioritizing safer, non-toxic alternatives wherever technically feasible. Numerous other companies in the semiconductor industry have already adopted effective substitutes to PFAS chemicals. The DEIS should ensure full transparency on the presence and use of PFAS at the manufacturing facility. The public has a right to know if toxic PFAS chemicals may be used and discharged into their environment.

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Micron has the opportunity to be a leader in sustainable technology and corporate responsibility. I urge you to strengthen the final EIS to reflect meaningful action on limiting PFAS, pretreating wastewater for PFAS chemicals, protecting wetlands, and maximizing clean, local renewable energy solutions.

Sincerely,
Ms. Julia Lane
111 Cardinal Ln Islip, NY 11751-3323
julslane111@gmail.com

From: kaleblan@everyactioncustom.com on behalf of Keenan LeBlanc
<kaleblan@everyactioncustom.com>
Sent: Wednesday, August 6, 2025 10:20 AM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Micron Project Draft Environmental Impact Statement

Dear Onondaga County Industrial Development Agency,

I am writing to express serious concerns about the Draft Environmental Impact Statement (DEIS) for the proposed Micron semiconductor facility. As one of the largest industrial developments in New York State's history, this project must be held to the highest standards of environmental responsibility and public health protection.

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Micron has the opportunity to be a leader in sustainable technology and corporate responsibility. I urge you to strengthen the final EIS to reflect meaningful action on limiting PFAS, pretreating wastewater for PFAS chemicals, protecting wetlands, and maximizing clean, local renewable energy solutions.

Sincerely,
Mr. Keenan LeBlanc
4901 Gorge Rd Cazenovia, NY 13035-9764
kaleblan@syr.edu

From: briana.last@everyactioncustom.com on behalf of Briana Last
<briana.last@everyactioncustom.com>
Sent: Wednesday, August 6, 2025 12:53 PM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Micron Project Draft Environmental Impact Statement

Dear Onondaga County Industrial Development Agency,

I am writing to express serious concerns about the Draft Environmental Impact Statement (DEIS) for the proposed Micron semiconductor facility. As one of the largest industrial developments in New York State's history, this project must be held to the highest standards of environmental responsibility and public health protection.

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Micron has the opportunity to be a leader in sustainable technology and corporate responsibility. I urge you to strengthen the final EIS to reflect meaningful action on limiting PFAS, pretreating wastewater for PFAS chemicals, protecting wetlands, and maximizing clean, local renewable energy solutions.

Sincerely,
Dr. Briana Last
101 Washington Ave Port Jefferson, NY 11777-2003 briana.last@gmail.com

From: lani.bauer1@everyactioncustom.com on behalf of Lani Bauer <lani.bauer1@everyactioncustom.com>
Sent: Wednesday, August 6, 2025 3:44 PM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Micron Project Draft Environmental Impact Statement

Dear Onondaga County Industrial Development Agency,

I am writing to express serious concerns about the Draft Environmental Impact Statement (DEIS) for the proposed Micron semiconductor facility. As one of the largest industrial developments in New York State's history, this project must be held to the highest standards of environmental responsibility and public health protection.

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Micron has the opportunity to be a leader in sustainable technology and corporate responsibility. I urge you to strengthen the final EIS to reflect meaningful action on limiting PFAS, pretreating wastewater for PFAS chemicals, protecting wetlands, and maximizing clean, local renewable energy solutions.

Sincerely,
Ms. Lani Bauer
11 Justin Cir Henrietta, NY 14467-9016
lani.bauer1@yahoo.com

From: thomasfranco@everyactioncustom.com on behalf of Thomas Franco
<thomasfranco@everyactioncustom.com>
Sent: Wednesday, August 6, 2025 3:57 PM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Micron Project Draft Environmental Impact Statement

Dear Onondaga County Industrial Development Agency,

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Sincerely,
Mr Thomas Franco
213 Asharoken Ave Northport, NY 11768-1120 thomasfranco@yahoo.com

From: luvapug2012@everyactioncustom.com on behalf of Susanna Stone <luvapug2012@everyactioncustom.com>
Sent: Wednesday, August 6, 2025 4:03 PM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Micron Project Draft Environmental Impact Statement

Dear Onondaga County Industrial Development Agency,

I am writing to express serious concerns about the Draft Environmental Impact Statement (DEIS) for the proposed Micron semiconductor facility. As one of the largest industrial developments in New York State's history, this project must be held to the highest standards of environmental responsibility and public health protection.

Micron must commit to phasing out the use of all PFAS chemicals and prioritizing safer, non-toxic alternatives wherever technically feasible. Numerous other companies in the semiconductor industry have already adopted effective substitutes to PFAS chemicals. The DEIS should ensure full transparency on the presence and use of PFAS at the manufacturing facility. The public has a right to know if toxic PFAS chemicals may be used and discharged into their environment.

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Micron has the opportunity to be a leader in sustainable technology and corporate responsibility. I urge you to strengthen the final EIS to reflect meaningful action on limiting PFAS, pretreating wastewater for PFAS chemicals, protecting wetlands, and maximizing clean, local renewable energy solutions.

Sincerely,
Ms. Susanna Stone
5 Barberry Ln Middle Island, NY 11953-1503 luvapug2012@gmail.com

From: heyjude4642@everyactioncustom.com on behalf of Judy Smith <heyjude4642@everyactioncustom.com>
Sent: Wednesday, August 6, 2025 4:13 PM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Micron Project Draft Environmental Impact Statement

Dear Onondaga County Industrial Development Agency,

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Sincerely,
Mrs. Judy Smith
170 Broadmoor Dr Tonawanda, NY 14150-5571 heyjude4642@aol.com

From: jerry.rivers13@everyactioncustom.com on behalf of Jerry Rivers <jerry.rivers13@everyactioncustom.com>
Sent: Wednesday, August 6, 2025 4:38 PM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Micron Project Draft Environmental Impact Statement

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Sincerely,
Mr. Jerry Rivers
8 Gombert Pl Roosevelt, NY 11575-1602
jerry.rivers13@yahoo.com

From: adarahuq917@everyactioncustom.com on behalf of Adrian Huq <adarahuq917@everyactioncustom.com>
Sent: Wednesday, August 6, 2025 4:52 PM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Micron Project Draft Environmental Impact Statement

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Sincerely,
Mx. Adrian Huq
1334 Scimitar Ave Elmont, NY 11003-3313 adarahuq917@gmail.com

From:**Mail received time:** Wed, 6 Aug 2025 20:58:57**Sent:** Sender: Sender; bh=br5MFrmO1WE/0y5J3Llf4GMV0VKvdtMSBqJO6+X5W58=; b=NupeWQga/63bHllbvN2gl6jcf12s9DAezT/uZ4gB6K26OnDUwQ8qeFpLMXmUE03zOEpRjfrC76P+uN2NaVDI9WuN7ekUSfKb/CVILt+jxY29tqCm9CMIInJd4mmEMugLWCQ7AHa2K0TddWugGP9ktp8+qYvfNoXp2F4T+GrReo6o=X**To:** [chipsnepa](#)**Subject:** [EXTERNAL] Micron Project Draft Environmental Impact Statement**Importance:** Normal**Sensitivity:** None**Archived:** Wednesday, October 8, 2025 9:35:41 AM

Dear Onondaga County Industrial Development Agency,

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Sincerely,

Mrs. Jen Horowitz

55 Bonnie Meadow Rd Scarsdale, NY 10583-6501

jenhorowitz3@gmail.com

From: irisastrof@everyactioncustom.com on behalf of Iris Astrof
<irisastrof@everyactioncustom.com>
Sent: Wednesday, August 6, 2025 6:45 PM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Micron Project Draft Environmental Impact Statement

Dear Onondaga County Industrial Development Agency,

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Sincerely,
Mrs. Iris Astrof
11 Mansfield Dr Massapequa Park, NY 11762-4033 irisastrof@aol.com

From: shackdownm@everyactioncustom.com on behalf of Margaret Shackell-Dowell
<shackdownm@everyactioncustom.com>
Sent: Wednesday, August 6, 2025 7:07 PM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Micron Project Draft Environmental Impact Statement

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Sincerely,
Dr. Margaret Shackell-Dowell
21 Placid Ter Ithaca, NY 14850-9024
shackdownm@outlook.com

From: derricktingley@everyactioncustom.com on behalf of Derrick Tingley
<derricktingley@everyactioncustom.com>
Sent: Wednesday, August 6, 2025 7:07 PM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Micron Project Draft Environmental Impact Statement

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Sincerely,
Mr. Derrick Tingley
234 Ruth St Minoa, NY 13116-1720
derricktingley@yahoo.com

From: gardnldy@everyactioncustom.com on behalf of Kathlynn Thomson
<gardnldy@everyactioncustom.com>
Sent: Wednesday, August 6, 2025 7:37 PM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Micron Project Draft Environmental Impact Statement

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Sincerely,
Ms Kathlynn Thomson
47 ADRIATIC Dr Melville, NY 11747
gardnldy@optonline.net

From: shcook0428@everyactioncustom.com on behalf of Steven Cook <shcook0428@everyactioncustom.com>
Sent: Wednesday, August 6, 2025 9:04 PM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Micron Project Draft Environmental Impact Statement

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Sincerely,
Mr Steven Cook
365 Kimberly Dr Rochester, NY 14610-3348 shcook0428@gmail.com

From: jenvogt12@everyactioncustom.com on behalf of Jennifer Vogt <jenvogt12@everyactioncustom.com>
Sent: Wednesday, August 6, 2025 10:07 PM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Micron Project Draft Environmental Impact Statement

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Sincerely,
Mrs. Jennifer Vogt
12 Leonard Dr East Northport, NY 11731-1420 jenvogt12@gmail.com

From: JadeSpawn@everyactioncustom.com on behalf of KATHRYN LAPP
<JadeSpawn@everyactioncustom.com>
Sent: Thursday, August 7, 2025 6:17 AM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Micron Project Draft Environmental Impact Statement

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Sincerely,
Miss KATHRYN LAPP
3 Birchfield Ct Coram, NY 11727-1115
JadeSpawn@hotmail.com

From: addiesmock@everyactioncustom.com on behalf of Amanda Smock
<addiesmock@everyactioncustom.com>
Sent: Thursday, August 7, 2025 1:00 PM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Micron Project Draft Environmental Impact Statement

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Sincerely,
Mx. Amanda Smock
176 Downs St Kingston, NY 12401-3537
addiesmock@yahoo.com

From: joeser167@everyactioncustom.com on behalf of Joseph Serigano <joeser167@everyactioncustom.com>
Sent: Thursday, August 7, 2025 5:53 PM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Micron Project Draft Environmental Impact Statement

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Sincerely,
Mr. Joseph Serigano
470 Manatuck Blvd Brightwaters, NY 11718-1021 joeser167@gmail.com

From: rjr.harvey4@everyactioncustom.com on behalf of Rita Harvey <rjr.harvey4@everyactioncustom.com>
Sent: Thursday, August 7, 2025 7:35 PM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Micron Project Draft Environmental Impact Statement

Dear Onondaga County Industrial Development Agency,

I am writing to express serious concerns about the Draft Environmental Impact Statement (DEIS) for the proposed Micron semiconductor facility. As one of the largest industrial developments in New York State's history, this project must be held to the highest standards of environmental responsibility and public health protection.

Micron must commit to phasing out the use of all PFAS chemicals and prioritizing safer, non-toxic alternatives wherever technically feasible. Numerous other companies in the semiconductor industry have already adopted effective substitutes to PFAS chemicals. The DEIS should ensure full transparency on the presence and use of PFAS at the manufacturing facility. The public has a right to know if toxic PFAS chemicals may be used and discharged into their environment.

Additionally, the destruction of over 200 acres of wetlands and thousands of feet of stream systems is unacceptable, particularly in a region as water-rich and ecologically sensitive as Central New York. Wetlands provide essential services like water purification, flood mitigation, and habitat for wildlife. The proposed 2:1 mitigation ratio does not come close to replacing these losses of high value wetlands. The DEIS should require a minimum 10:1 mitigation ratio and prioritize restoration efforts near the impacted areas to preserve watershed integrity.

Micron must also go much further in maximizing on-site renewable energy generation. The proposed 4 megawatts of solar energy is a fraction of what is needed to power a facility of this scale. All viable rooftop, parking, and adjacent land areas should be evaluated for solar deployment, and geothermal energy options should be fully explored. Finally, I urge Micron to avoid relying on speculative new or advanced nuclear development to meet its energy needs. New nuclear power is costly, unproven in this timeframe, and carries long-term environmental risks. Clean, proven renewable technologies like solar, wind, and geothermal are the right path forward for this project and for New York's climate goals.

Micron has the opportunity to be a leader in sustainable technology and corporate responsibility. I urge you to strengthen the final EIS to reflect meaningful action on limiting PFAS, pretreating wastewater for PFAS chemicals, protecting wetlands, and maximizing clean, local renewable energy solutions.

Sincerely,
Mrs. Rita Harvey
108 Harding Rd Buffalo, NY 14220-2249
rjr.harvey4@gmail.com

From: las7997@everyactioncustom.com on behalf of Laura Ubriaco <las7997@everyactioncustom.com>
Sent: Friday, August 8, 2025 7:17 AM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Micron Project Draft Environmental Impact Statement

Dear Onondaga County Industrial Development Agency,

I am writing to express serious concerns about the Draft Environmental Impact Statement (DEIS) for the proposed Micron semiconductor facility. As one of the largest industrial developments in New York State's history, this project must be held to the highest standards of environmental responsibility and public health protection.

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Micron has the opportunity to be a leader in sustainable technology and corporate responsibility. I urge you to strengthen the final EIS to reflect meaningful action on limiting PFAS, pretreating wastewater for PFAS chemicals, protecting wetlands, and maximizing clean, local renewable energy solutions.

Sincerely,
Mrs. Laura Ubriaco
46 Cliftwood Dr Halesite, NY 11743-2103 las7997@aol.com

From: dabydibi@everyactioncustom.com on behalf of Angelica Crotty
<dabydibi@everyactioncustom.com>
Sent: Friday, August 8, 2025 7:27 AM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Micron Project Draft Environmental Impact Statement

Dear Onondaga County Industrial Development Agency,

I am writing to express serious concerns about the Draft Environmental Impact Statement (DEIS) for the proposed Micron semiconductor facility. As one of the largest industrial developments in New York State's history, this project must be held to the highest standards of environmental responsibility and public health protection.

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Micron has the opportunity to be a leader in sustainable technology and corporate responsibility. I urge you to strengthen the final EIS to reflect meaningful action on limiting PFAS, pretreating wastewater for PFAS chemicals, protecting wetlands, and maximizing clean, local renewable energy solutions.

Sincerely,
Mrs. Angelica Crotty
173 Division Ave Levittown, NY 11756-2910 dabydibi@aol.com

From:**Mail received time:** Fri, 8 Aug 2025 15:11:47**Sent:** Sender: Sender; bh=BrL0GK1khjsuAWHrq8ONIXeiTv25piCcSK5EkVUwFNs=; b=PkXDHI9hP2Xxwk59KORvrTzhj/QPHgfr8kBADmeNbRDyxO3AH3bAWG1TJyb9uS1YWJuimLNQyxWZiwTx4NjXHkzmDfrV82rpbB/W0bGxnsoNb9oARsEJPEv6NVXI4IghrUczltC9JnZk2j5djBfOH3PAspFmre9vILMfsTxdOLw=X**To:** [chipsnepa](#)**Subject:** [EXTERNAL] Micron Project Draft Environmental Impact Statement**Importance:** Normal**Sensitivity:** None**Archived:** Thursday, August 14, 2025 10:53:53 AM

Dear Onondaga County Industrial Development Agency,

I am writing to express serious concerns about the Draft Environmental Impact Statement (DEIS) for the proposed Micron semiconductor facility. As one of the largest industrial developments in New York State's history, this project must be held to the highest standards of environmental responsibility and public health protection.

Micron must commit to phasing out the use of all PFAS chemicals and prioritizing safer, non-toxic alternatives wherever technically feasible. Numerous other companies in the semiconductor industry have already adopted effective substitutes to PFAS chemicals. The DEIS should ensure full transparency on the presence and use of PFAS at the manufacturing facility. The public has a right to know if toxic PFAS chemicals may be used and discharged into their environment.

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Micron has the opportunity to be a leader in sustainable technology and corporate responsibility. I urge you to strengthen the final EIS to reflect meaningful action on limiting PFAS, pretreating wastewater for PFAS chemicals, protecting wetlands, and maximizing clean, local renewable energy solutions.

Sincerely,

Mr. Russell Comeau

422 Oceanside Ave Breezy Point, NY 11697-1923

russ@bassdozer.com

From:**Mail received time:** Fri, 8 Aug 2025 21:49:42**Sent:** Sender: Sender; bh=W**To:** [chipsnepa](#)**Subject:** [EXTERNAL] Micron Project Draft Environmental Impact Statement**Importance:** Normal**Sensitivity:** None**Archived:** Thursday, August 14, 2025 10:54:48 AM

Dear Onondaga County Industrial Development Agency,

I am writing to express serious concerns about the Draft Environmental Impact Statement (DEIS) for the proposed Micron semiconductor facility. As one of the largest industrial developments in New York State's history, this project must be held to the highest standards of environmental responsibility and public health protection.

Micron must commit to phasing out the use of all PFAS chemicals and prioritizing safer, non-toxic alternatives wherever technically feasible. Numerous other companies in the semiconductor industry have already adopted effective substitutes to PFAS chemicals. The DEIS should ensure full transparency on the presence and use of PFAS at the manufacturing facility. The public has a right to know if toxic PFAS chemicals may be used and discharged into their environment.

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Micron has the opportunity to be a leader in sustainable technology and corporate responsibility. I urge you to strengthen the final EIS to reflect meaningful action on limiting PFAS, pretreating wastewater for PFAS chemicals, protecting wetlands, and maximizing clean, local renewable energy solutions.

Sincerely,

Mr Jerry Rivers

8 Gombert Pl Roosevelt, NY 11575-1602

jerry.rivers13@yahoo.com

From:**Mail received time:** Sun, 10 Aug 2025 11:19:24**Sent:** Sender: Sender; bh=w1iFjCPt2pMbLhJoGo4RyHBgdVaqTezJaWUyDnu8HBE=; b=SnibRughreaolqgoZL1MkZcFIPXwJtLhgQ1WGfrCbReUEkBywzIMxAcxz70d/lcxt6rNKrN0b2ctEejhk7I00ikk6oYkKo0pEieypTGBSk+EVGbSFnZW7DbCOkGA7zHNP76k0VfgzdmIR9h5ysVyJ SYMi9ZLi/N9OJbLSf9icF8=X**To:** [chipsnepa](#)**Subject:** [EXTERNAL] Micron Project Draft Environmental Impact Statement**Importance:** Normal**Sensitivity:** None**Archived:** Wednesday, October 8, 2025 10:51:33 AM

Dear Onondaga County Industrial Development Agency,

I am writing to express serious concerns about the Draft Environmental Impact Statement (DEIS) for the proposed Micron semiconductor facility. As one of the largest industrial developments in New York State's history, this project must be held to the highest standards of environmental responsibility and public health protection.

Micron must commit to phasing out the use of all PFAS chemicals and prioritizing safer, non-toxic alternatives wherever technically feasible. Numerous other companies in the semiconductor industry have already adopted effective substitutes to PFAS chemicals. The DEIS should ensure full transparency on the presence and use of PFAS at the manufacturing facility. The public has a right to know if toxic PFAS chemicals may be used and discharged into their environment.

Also, Micron has only simplistically addressed risks to the safety of our local water supply. The EIS should have a more fully developed vulnerability assessment/risk management approach to addressing any potential accidental spills that could easily enter the Oneida River and ultimately impact OCWA's water intake.

Additionally, the destruction of over 200 acres of wetlands and thousands of feet of stream systems is unacceptable, particularly in a region as water-rich and ecologically sensitive as Central New York. Wetlands provide essential services like water purification, flood mitigation, and habitat for wildlife. The proposed 2:1 mitigation ratio does not come close to replacing these losses of high value wetlands. The DEIS should require a minimum 10:1 mitigation ratio and prioritize restoration efforts near the impacted areas to preserve watershed integrity.

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Micron has the opportunity to be a leader in sustainable technology and corporate responsibility. I urge you to strengthen the final EIS to reflect meaningful action on limiting PFAS, pretreating wastewater for PFAS chemicals, protecting wetlands, and maximizing clean, local renewable energy solutions.

Sincerely,

Mrs. Susan LeBlanc

5447 Buyea Rd Canastota, NY 13032-4959

leblanc.sl@gmail.com

Archived: Wednesday, October 8, 2025 10:43:29 AM

From: [Doreen Tignanelli \(doreentig@aol.com\)](mailto:doreentig@aol.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 20:21:08

Sent: Fri, 08 Aug 2025 20:21:03

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources:** The Micron project is slated to destroy hundreds of acres of wetlands that provide habitat for species and provide natural flood mitigation. The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds. Ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
- **Protection of Air, Water, and Workers:** Microchip production requires numerous toxic chemicals, including PFAS "forever chemicals," but the DEIS does not provide sufficient detail on the types of chemicals that will be used or how continuous environmental monitoring and compliance will be enforced. The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the use of thousands of tons of hazardous chemicals in semiconductor production every year. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
- **Greenhouse Gases:** The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar, and without relying on renewable energy credits or using renewable energy that is already on the grid, to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.
- **Affordable and Abundant Water and Energy:** The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of

infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Doreen Tignanelli
29 Colburn Dr
Poughkeepsie, NY 12603
doreentig@aol.com
(845) 462-0235

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

From:**Mail received time:** Mon, 11 Aug 2025 17:01:46**Sent:** Sender: Sender; bh=rx4vOLBo30sdCbKvKv1F8+8hbGShsbix4Mg+4WXbuk=; b=LkDdMC864C0zueyrN+YpzvVQCivG4TDFYfoCrtkSs2CyOPeOP5n9R0O+HXNiZvz0Uj0ltShSPxRqhL/soKpMNKHICC0+ESwV5y0nLnMGagzj8ZFP7uXszpnoEJCO rNK5W/fGgJsKZiOt6+n mqljSY68MWBvncAqy9MoiXCM2fH4=X**To:** [chipsnepa](#)**Subject:** [EXTERNAL] Micron Project Draft Environmental Impact Statement**Importance:** Normal**Sensitivity:** None**Archived:** Wednesday, October 8, 2025 10:48:45 AM

Dear Onondaga County Industrial Development Agency,

I am writing to express serious concerns about the Draft Environmental Impact Statement (DEIS) for the proposed Micron semiconductor facility. As one of the largest industrial developments in New York State's history, this project must be held to the highest standards of environmental responsibility and public health protection.

Micron must commit to phasing out the use of all PFAS chemicals and prioritizing safer, non-toxic alternatives wherever technically feasible. Numerous other companies in the semiconductor industry have already adopted effective substitutes to PFAS chemicals. The DEIS should ensure full transparency on the presence and use of PFAS at the manufacturing facility. The public has a right to know if toxic PFAS chemicals may be used and discharged into their environment.

Additionally, the destruction of over 200 acres of wetlands and thousands of feet of stream systems is unacceptable, particularly in a region as water-rich and ecologically sensitive as Central New York. Wetlands provide essential services like water purification, flood mitigation, and habitat for wildlife. The proposed 2:1 mitigation ratio does not come close to replacing these losses of high value wetlands. The DEIS should require a minimum 10:1 mitigation ratio and prioritize restoration efforts near the impacted areas to preserve watershed integrity.

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Micron has the opportunity to be a leader in sustainable technology and corporate responsibility. I urge you to strengthen the final EIS to reflect meaningful action on limiting PFAS, pretreating wastewater for PFAS chemicals, protecting wetlands, and maximizing clean, local renewable energy solutions.

Sincerely,

Ms. Lisa Druke

323 Cleveland Blvd Fayetteville, NY 13066-1105

lisadruke@gmail.com

From:**Mail received time:** Mon, 11 Aug 2025 18:40:48**Sent:** Sender: Sender; bh=/2yr4KguRIRQIU5R88ub98fjbtHrJ8g0tkWcVOHhbvQ=; b=fGSW27ycQPSIMhpyUrJqjcTEje1tHSD3TfW/HPT66SNTf+GTXmltK8Ob2VOceFpoVyl1IZa0TAs4V9wy2wKh8wQRBJXZbRW2k8PoRFIJXISnsjsy2jpexmNk9a/nWgucEhdHEpu9VWcpgbHOy8Ma80D/nY96JluMGKKQwjRDKuo=X**To:** [chipsnepa](#)**Subject:** [EXTERNAL] Micron Project Draft Environmental Impact Statement**Importance:** Normal**Sensitivity:** None**Archived:** Wednesday, August 13, 2025 11:43:42 AM

Dear Onondaga County Industrial Development Agency,

I am writing to express serious concerns about the Draft Environmental Impact Statement (DEIS) for the proposed Micron semiconductor facility. As one of the largest industrial developments in New York State's history, this project must be held to the highest standards of environmental responsibility and public health protection.

Micron must commit to phasing out the use of all PFAS chemicals and prioritizing safer, non-toxic alternatives wherever technically feasible. Numerous other companies in the semiconductor industry have already adopted effective substitutes to PFAS chemicals. The DEIS should ensure full transparency on the presence and use of PFAS at the manufacturing facility. The public has a right to know if toxic PFAS chemicals may be used and discharged into their environment.

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Sincerely,

Miss Lorrie Ann Feliciano

119 Pondfield Rd Unit 242 Bronxville, NY 10708-7612

lafactuslife@gmail.com

Archived: Monday, October 13, 2025 5:44:54 PM

From: [Judy Granatstein](#)

Mail received time: Sun, 10 Aug 2025 18:46:23

Sent: Sunday, August 10, 2025 2:46:24 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft environmental assessment EISX-006-55-CPO-001

Importance: Normal

Sensitivity: None

August 10, 2025

Comments regarding Micron:

In 1998 Hyundai, which became Hynix, opened a semi-conductor chip plant in Eugene, Oregon. At \$1.5 billion dollars, it was the biggest private project to have ever been built in the state of Oregon. It was welcomed by both the townspeople and government for all it would do for the local economy and growth of Eugene. Hynix was given \$27 million dollars in tax breaks in exchange for the promised creation of over 1000 new jobs and a robust presence in the community. When the temporary construction jobs were finished, there were about 900 permanent new jobs remaining. In 2001, just 3 years after opening, an economic downturn and rapid changes in technology resulted in a layoff of 600 of those jobs. A year later, the plant closed to retool at a cost of \$156 million dollars and an additional \$2.2 million dollar tax break from the city. Micron then tried to buy the plant but the deal didn't materialize. In 2006 Hynix said they would invest another \$250 million and create 100 jobs. We all believed it would happen because why would they abandon a project in which they were already heavily invested? Well it didn't happen. And in 2008 it was permanently abandoned and still sits empty today. Ten years from opening to permanently shut down, only half of which were in production.

How did the Eugene community benefit from this? The city lost money having provided nearly \$30 million in tax breaks. Hynix used huge amounts of the seemingly endless water, some of the purest in the country, and benefited from the proximity to the Columbia River for power at a low rate while the public incurred utility rate increases. Those employed by Hynix were now on unemployment insurance and looking for work. It did not bring great prosperity to the area. A few people got very rich but most of the community did not feel any trickle down and nothing got to those most in need.

Now we have Micron selling itself to Central New York. It is on a massive scale compared to the project in Eugene, Oregon, so the problems and effects from it, though reminiscent, will be more far reaching and impactful. The DEIS fails to address many of the issues and impacts of this huge project. It will devastate multiple environments, from the loss of valuable wetlands to the source of Onondaga County's drinking water.

A wetlands takes dozens, if not hundreds of years to become an established and viable habitat. Restoration and replacement will not mitigate the loss of the hundreds of acres of wetlands. The endangered species in these wetlands will likely not survive.

Huge amounts of clean water are necessary to meet Micron's production target, water to be taken from Lake Ontario. The production waste water will be processed and returned to Lake Ontario via the Oneida and Oswego Rivers. It will then be discharged into Lake Ontario a mere two miles from Onondaga County's source of drinking water. Since the effectiveness of the cleaning process is not clear in the DEIS, the water may contain contaminants, including PFAs, that have yet to be identified by Micron or the DEIS.

The electricity usage will also be enormous, yet no renewable energy component is included in Micron's project other than an insignificant amount of solar that will provide .0003% of the fabs' electricity. This enormous use of power and water will ultimately be underwritten by us, the general public, in higher rates and compromised resource quality.

There are so many additional issues and questions to be answered: Traffic, air quality, water quality, storm water

runoff from 600 acres of impermeable surfaces, impact on wildlife, not to mention community quality of life issues. The time period for public education and comments is horribly inadequate. Please extend it for another 60-90 days to allow for more community outreach and input. With so many issues still unanswered and unclear in the DEIS, allowing time for a more complete document seems extremely reasonable.

Will Micron be of huge benefit to the CNY community? Like in Eugene, it will make some people very rich and provide others with steady employment. But the impact felt by most of the population of CNY will more traffic, a higher cost of living, and the loss of a quality of life that has always made CNY so very, very special.

And who is to say they will even complete the project? Technology and markets change faster than plans are drawn or fabs are built. The technology for which the fabs are designed and tooled will likely be obsolete before the project is complete in 2041. Will they retool the fabs or abandon them? And how many of the 9000 jobs will have been replaced by AI? Would it not be wiser to build one or two fabs, then assess technology and market changes rather than to commit to build four fabs that may be a much bigger impact than necessary? This proposal from Micron is far from being ready to implement as seen by the many holes in the DEIS.

Thank you,

Judy Granatstein

judygran50@gmail.com

Archived: Monday, October 13, 2025 5:31:58 PM

From: [Melanie Acampora \(melaacampora@gmail.com\)](mailto:melaacampora@gmail.com) Sent You a Personal Message

Mail received time: Fri, 8 Aug 2025 17:10:18

Sent: Fri, 08 Aug 2025 17:09:44

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources:** The Micron project is slated to destroy hundreds of acres of wetlands that provide habitat for species and provide natural flood mitigation. The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds. Ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
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- **Affordable and Abundant Water and Energy:** The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of

infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Melanie Acampora
201 Myrtle Ave
Port Jefferson, NY 11777
melaacampora@gmail.com
(631) 626-1651

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:32:10 PM

From: [Sharon Nanos \(lists@rsnanos.me\)](mailto:lists@rsnanos.me) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 17:10:42

Sent: Fri, 08 Aug 2025 17:10:37

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

I urge consideration and response to the following issues and concerns:

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- **Affordable and Abundant Water and Energy:** The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of

infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Sharon Nanos
17 Dean St
North Babylon, NY 11703
lists@rsnanos.me
(516) 234-5678

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:32:17 PM

From: [Joy Cranker \(talkpiggy@aol.com\)](mailto:talkpiggy@aol.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 17:11:13

Sent: Fri, 08 Aug 2025 17:11:10

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

The Environment must be considered.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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- Affordable and Abundant Water and Energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Joy Cranker
168 Old Lake Colby Rd
Saranac Lake, NY 12983
talkpiggy@aol.com
(518) 891-1041

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:32:25 PM

From: [Julie Pellman \(juliepellman@hotmail.com\)](mailto:juliepellman@hotmail.com) Sent You a Personal Message

Mail received time: Fri, 8 Aug 2025 17:11:14

Sent: Fri, 08 Aug 2025 17:11:08

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

I urge consideration and response to the following issues and concerns:

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Julie Pellman
140 Cadman Plz W Apt 21J
Brooklyn, NY 11201
juliepellman@hotmail.com
(917) 853-1823

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:32:33 PM

From: [Gayle Boesky \(gboesky@icloud.com\)](mailto:gboesky@icloud.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 17:11:26

Sent: Fri, 08 Aug 2025 17:10:53

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Gayle Boesky
6039 Huxley Ave
Bronx, NY 10471
gboesky@icloud.com
(917) 365-9940

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:32:40 PM

From: [Patti Weinberg \(pattiw175@msn.com\)](mailto:pattiw175@msn.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 17:11:32

Sent: Fri, 08 Aug 2025 17:11:25

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Patti Weinberg
11 Amherst Rd
Sag Harbor, NY 11963
pattiw175@msn.com
(212) 842-3679

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:32:48 PM

From: [Kristina Younger \(key12061@gmail.com\)](mailto:key12061@gmail.com) Sent You a Personal Message

Mail received time: Fri, 8 Aug 2025 17:11:44

Sent: Fri, 08 Aug 2025 17:11:39

To: chipsnepa

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Kristina Younger
480 Pond View
Petersburg, NY 12138
key12061@gmail.com
(518) 555-5555

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:32:56 PM

From: [Deborah Stedje \(djstedge@gmail.com\)](mailto:djstedge@gmail.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 17:12:00

Sent: Fri, 08 Aug 2025 17:09:45

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Deborah Stedge
28 Wilshire Dr
Spring Valley, NY 10977
djstedge@gmail.com
(914) 953-8674

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:33:04 PM

From: [Nia Delardi \(06hermionejr@gmail.com\)](mailto:Nia.Delardi@06hermionejr@gmail.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 17:12:17

Sent: Fri, 08 Aug 2025 17:12:12

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Nia Delardi
51 Edgewood Dr
Baldwinsville, NY 13027
06hermionejr@gmail.com
(315) 412-9742

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Archived: Monday, October 13, 2025 5:33:12 PM

From: [Susan Ford \(fords208@gmail.com\)](mailto:fords208@gmail.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 17:13:06

Sent: Fri, 08 Aug 2025 17:12:18

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources:** The Micron project is slated to destroy hundreds of acres of wetlands that provide habitat for species and provide natural flood mitigation. The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds. Ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
- **Protection of Air, Water, and Workers:** Microchip production requires numerous toxic chemicals, including PFAS "forever chemicals," but the DEIS does not provide sufficient detail on the types of chemicals that will be used or how continuous environmental monitoring and compliance will be enforced. The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the use of thousands of tons of hazardous chemicals in semiconductor production every year. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
- **Greenhouse Gases:** The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar, and without relying on renewable energy credits or using renewable energy that is already on the grid, to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.
- **Affordable and Abundant Water and Energy:** The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of

infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Susan Ford
22 Saddle Back Ridge Rd
East Nassau, NY 12062
fords208@gmail.com
(518) 555-5555

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:33:20 PM

From: [Curtis Bohlen \(cd1997bbb@aol.com\)](mailto:cd1997bbb@aol.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 17:13:31

Sent: Fri, 08 Aug 2025 17:12:16

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

This is a very important issue to me and my whole Family.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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- Affordable and Abundant Water and Energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Curtis Bohlen
176 Northfield Ave
Dobbs Ferry, NY 10522
cd1997bbb@aol.com
(914) 376-9800

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:33:28 PM

From: [Shaeril McBrown \(cutiepasta128@gmail.com\)](mailto:cutiepasta128@gmail.com) Sent You a Personal Message

Mail received time: Fri, 8 Aug 2025 17:13:50

Sent: Fri, 08 Aug 2025 17:13:46

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Shaeril McBrown
2914 Tenbroeck Ave
Bronx, NY 10469
cutiepasta128@gmail.com
(585) 553-0740

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:33:35 PM

From: [Rebeca Rumayor \(beckyrumayor@gmail.com\)](mailto:beckyrumayor@gmail.com) Sent You a Personal Message

Mail received time: Fri, 8 Aug 2025 17:14:44

Sent: Fri, 08 Aug 2025 17:14:39

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Micron must take into account feedback from the community about environmental impact

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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- Affordable and Abundant Water and Energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Rebeca Rumayor
31-84 51st Street, 1d
Woodside, NY 11377
beckyrumayor@gmail.com
(929) 348-7551

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:33:44 PM

From: [Ben Martin \(bendicoot@yahoo.com\)](mailto:bendicoot@yahoo.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 17:15:32

Sent: Fri, 08 Aug 2025 17:15:17

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Ben Martin
10 Aiken Ct
Plattsburgh, NY 12903
bendicoot@yahoo.com
(203) 215-0395

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Archived: Monday, October 13, 2025 5:33:51 PM

From: [Janis Smith \(janis195752@yahoo.com\)](mailto:janis195752@yahoo.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 17:15:52

Sent: Fri, 08 Aug 2025 17:15:05

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Janis Smith
9 Cassa Loop
Holtsville, NY 11742
janis195752@yahoo.com
(631) 698-6760

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:33:59 PM

From:

Mail received time: Fri, 8 Aug 2025 17:16:01

Sent: Fri, 08 Aug 2025 17:15:56

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Vinny Aliperti
4760 State Route 14
Geneva, NY 14456
vinny@billsborowinery.com
(315) 521-5535

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:34:07 PM

From: [Phillip Gioia \(drgioia@verizon.net\)](mailto:drgioia@verizon.net) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 17:16:35

Sent: Fri, 08 Aug 2025 17:16:31

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

As a local grandfather, pediatrician, and public health physician I would like to be sure that we are able to protect our environment and promote health in our area while building to meet the needs of the future. Please address potential water, air, energy, and PFAS problems before they cause health problems?

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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CHIPS Act.

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Phillip Gioia
330 N Seward Ave
Auburn, NY 13021
drgioia@verizon.net
(315) 255-6919

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Archived: Monday, October 13, 2025 5:34:15 PM

From: [Chris Proctor \(chrisproctorcih@gmail.com\)](mailto:chrisproctorcih@gmail.com) Sent You a Personal Message

Mail received time: Fri, 8 Aug 2025 17:16:45

Sent: Fri, 08 Aug 2025 17:16:39

To: chipsnepa

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Chris Proctor
266 W 73rd St Apt 4B
New York, NY 10023
chrisproctorcih@gmail.com
(212) 496-1169

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:34:22 PM

From: [Tonya Michel \(tojomi70@yahoo.com\)](mailto:tojomi70@yahoo.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 17:17:25

Sent: Fri, 08 Aug 2025 17:16:37

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Tonya Michel
PO Box 60
Quogue, NY 11959
tojomi70@yahoo.com
(720) 244-2607

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:34:30 PM

From:

Mail received time: Fri, 8 Aug 2025 17:18:33

Sent: Fri, 08 Aug 2025 17:17:44

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Joseph Kollar
219 Hill St
Mahopac, NY 10541
joseph.kollar1@verizon.net
(845) 628-8160

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:34:38 PM

From: [judy Kollar \(judy.kollar1@verizon.net\)](mailto:judy.kollar1@verizon.net) Sent You a Personal Message

Mail received time: Fri, 8 Aug 2025 17:18:45

Sent: Fri, 08 Aug 2025 17:18:40

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

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219 Hill St
Mahopac, NY 10541
joseph.kollar1@verizon.net
(845) 628-8160

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Archived: Monday, October 13, 2025 5:34:46 PM

From: [Taylor Spencer \(trs418@aol.com\)](mailto:trs418@aol.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 17:18:52

Sent: Fri, 08 Aug 2025 17:15:59

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

My family and my in-laws, including very young nieces and nephews, continue to live in the CNY area: Bridgeport, Liverpool, Geddes and Onondaga Hill. We swim regularly in Oneida Lake, and value protecting that watershed. The health and sustainability of the area remains near and dear to my heart. I grew up in the shadow of Onondaga Lake, whose ecological destruction is a testament to the harms business can do without appropriate precautions. I fully support the idea of Micron bringing industry to the area. But I would want every effort given to sustainability and placing Micron as a model for how to make an area better with business. I encourage you to invest in monitoring and compliance, in addition to minimizing waste and building renewable energy sources that are likely better for business in the long term anyway. The DEIS warrants a full exploration of these concerns.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Taylor Spencer
1181 Ardsley Rd
Schenectady, NY 12308
trs418@aol.com
(518) 911-1111

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Archived: Monday, October 13, 2025 5:34:54 PM

From: [Alex Zackrone \(seaalexonly@aol.com\)](mailto:seaalexonly@aol.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 17:20:09

Sent: Fri, 08 Aug 2025 17:20:04

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Alex Zackrone
5 Franklin Ave Apt 2R
White Plains, NY 10601
seaalexonly@aol.com
(914) 285-9834

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:35:01 PM

From: [L Byers \(kneehighsinfall@gmail.com\)](mailto:kneehighsinfall@gmail.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 17:20:15

Sent: Fri, 08 Aug 2025 17:20:12

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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Sincerely,

Sincerely,

L Byers
8 Country Club Drive
Ballston Spa, NY 12020
kneehighsinfall@gmail.com
(518) 765-4760

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Archived: Monday, October 13, 2025 5:35:09 PM

From: [Lisa Pasch \(paschl@hotmail.com\)](mailto:paschl@hotmail.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 17:20:59

Sent: Fri, 08 Aug 2025 17:17:26

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Some actions are not reversible. Please protect my young sons' future. Be leaders, not followers.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Lisa Pasch
78 Meadow St
Garden City, NY 11530
paschl@hotmail.com
(347) 665-7997

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Archived: Monday, October 13, 2025 5:35:17 PM

From: [Vivienne Lenk \(lenkv1@aol.com\)](mailto:lenkv1@aol.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 17:21:01

Sent: Fri, 08 Aug 2025 17:20:57

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

People cannot live on andquot;microchipsandquot; they cannot eat them or nourish their bodies with microchips. And there isnandapos;t enough money to clean up the waste from their manufacturing process. We just had the hottest year on record. Water is essential for humans to live, for pets/livestock to live, for food crops to grow. If you destroy vital water resources to make an unnecessary product, have no plan to stop environmental disaster or have no sizeable multi-billion \$ bond to fix any disaster, then we will create yet another cycle of destruction. You must insist on a full EIS, which includes not just how flooded areas will be economically compensated, but how water -- on those 102 days when animals, plants and people -need it -will be adversely affected. And you MUST extend the comment period and advertise it widely in NY.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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- **Protection of Air, Water, and Workers:** Microchip production requires numerous toxic chemicals, including PFAS "forever chemicals," but the DEIS does not provide sufficient detail on the types of chemicals that will be used or how continuous environmental monitoring and compliance will be enforced. The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the use of thousands of tons of hazardous chemicals in semiconductor production every year. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.

- Greenhouse Gases: The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar, and without relying on renewable energy credits or using renewable energy that is already on the grid, to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

- Affordable and Abundant Water and Energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Vivienne Lenk
251-31 42nd Avenue
Little Neck, NY 11363
lenkv1@aol.com
(718) 224-7256

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:35:25 PM

From:

Mail received time: Fri, 8 Aug 2025 17:21:13

Sent: Fri, 08 Aug 2025 17:21:07

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

NO NO NO TO MICRON'S IDEA TO TAKE OVER OUR COMMUNITY WITH ITS DANGEROUS CONSEQUENCES FOR PEOPLE'S SAFETY AND HEALTH SO AS TO ONCE AGAIN LINE THEIR POCKETS !!

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

I urge consideration and response to the following issues and concerns:

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CHIPS Act.

- Affordable and Abundant Water and Energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

DR HARRY AND PATRICIA C SCHWARZLANDER

1301 Nottingham Rd Apt C211

Jamesville, NY 13078

pcs@tigerbunny.com

(315) 446-8009

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:35:33 PM

From: [Amanda Alcamo \(moffattmandy14@aol.com\)](mailto:moffattmandy14@aol.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 17:22:11

Sent: Fri, 08 Aug 2025 17:22:05

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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- **Affordable and Abundant Water and Energy:** The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of

infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Amanda Alcamo
7857 269th St
New Hyde Park, NY 11040
moffattmandy14@aol.com
(718) 962-1080

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:35:41 PM

From: [Doug DeFeo \(dougdefeo@optonline.net\)](mailto:dougdefeo@optonline.net) Sent You a Personal Message

Mail received time: Fri, 8 Aug 2025 17:26:10

Sent: Fri, 08 Aug 2025 17:25:39

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

This facility will be very profitable - even with greater caution and care - taking environmental considerations into your decision making process - will help this project provide an even greater benefit for the communities in the region as well as their shareholders.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Doug DeFeo
9 West Ln
East Moriches, NY 11940
dougdefeo@optonline.net
(516) 361-3350

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:35:48 PM

From:

Mail received time: Fri, 8 Aug 2025 17:26:18

Sent: Fri, 08 Aug 2025 17:26:16

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

While we need a chip factory, everything must be done to protect the environment so that water and air are not adversely affected.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Beth Jane Freeman
1265 Hawthorne Dr E
Wantagh, NY 11793
bethjane1220@netscape.net
(516) 826-4425

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:35:56 PM

From: [Jenna Hoggan \(jennaann127@gmail.com\)](mailto:jennaann127@gmail.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 17:26:23

Sent: Fri, 08 Aug 2025 17:26:19

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

I live in Troy, NY where we have seen the horrible, immediate problems with habitat destruction. The scale of the development that caused these disruptions is minuscule compared to the intervention proposed in Clay. Now, more than ever, we need to be incredibly mindful of how proposed developments will impact not just the environment itself but the people and animals that live around it. I urge you to look into this matter deeply, and to investigate if there is not an already developed site that is laying unused that could be the site of the facility instead.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Jenna Hoggan
884 8th Ave
Troy, NY 12182
jennaann127@gmail.com
(518) 956-1994

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:36:04 PM

From: [David Briggs \(euclidsgeometry@gmail.com\)](mailto:euclidsgeometry@gmail.com) Sent You a Personal Message

Mail received time: Fri, 8 Aug 2025 17:28:13

Sent: Fri, 08 Aug 2025 17:27:38

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

David Briggs
5 Saljon Ct
Centereach, NY 11720
euclidsgeometry@gmail.com
(631) 467-9326

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:36:11 PM

From: [Donna Keem \(djkeem@hotmail.com\)](mailto:djkeem@hotmail.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 17:31:24

Sent: Fri, 08 Aug 2025 17:30:35

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

All these factors must be addressed before moving forward with such a project.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Donna Keem
2933 Wing St
Bliss, NY 14024
djkeem@hotmail.com
(585) 322-9082

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:36:19 PM

From: [Ellen Lowitt \(lowe73444@gmail.com\)](mailto:lowe73444@gmail.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 17:35:54

Sent: Fri, 08 Aug 2025 17:35:49

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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- **Affordable and Abundant Water and Energy:** The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of

infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Ellen Lowitt
12 Calvert Dr
Syosset, NY 11791
lowe73444@gmail.com
(516) 652-3120

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:36:27 PM

From: [Michelle Rogers \(bombshel73@yahoo.com\)](mailto:bombshel73@yahoo.com) Sent You a Personal Message

Mail received time: Fri, 8 Aug 2025 17:36:23

Sent: Fri, 08 Aug 2025 17:36:18

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources:** The Micron project is slated to destroy hundreds of acres of wetlands that provide habitat for species and provide natural flood mitigation. The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds. Ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Michelle Rogers
PO Box 33
Brooktondale, NY 14817
bombshe173@yahoo.com
(585) 226-3130

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:36:35 PM

From: [Michael Andrea \(mkandrea1@gmail.com\)](mailto:mkandrea1@gmail.com) Sent You a Personal Message

Mail received time: Fri, 8 Aug 2025 17:36:32

Sent: Fri, 08 Aug 2025 17:36:29

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Michael Andrea
32 Arthur St
Blauvelt, NY 10913
mkandrea1@gmail.com
(845) 300-4579

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:36:43 PM

From:

Mail received time: Fri, 8 Aug 2025 17:36:36

Sent: Fri, 08 Aug 2025 17:35:47

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Brooke Bell
118 Beadel St
Brooklyn, NY 11222
bell.brookebell.brooke@gmail.com
(917) 284-4470

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:36:51 PM

From: [Tami Swartz \(tamiswartz@gmail.com\)](mailto:tamiswartz@gmail.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 17:36:45

Sent: Fri, 08 Aug 2025 17:36:38

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Tami Swartz
310 Riverside Dr Apt 1117
New York, NY 10025
tamiswartz@gmail.com
(212) 316-1695

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:36:58 PM

From: [Nora Walker \(nowalk54@gmail.com\)](mailto:nowalk54@gmail.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 17:38:13

Sent: Fri, 08 Aug 2025 17:38:08

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Nora Walker
49 Country Est
South Cairo, NY 12482
nowalk54@gmail.com
(518) 821-7579

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:37:06 PM

From:

Mail received time: Fri, 8 Aug 2025 17:40:26

Sent: Fri, 08 Aug 2025 17:39:54

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Christopher Gagnon
124 Main St Apt 2
Hudson Falls, NY 12839
madmoxieman@yahoo.com
(443) 201-4317

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:37:14 PM

From: [Jamie Johnson \(jamiejohnsonmyc@gmail.com\)](mailto:jamiejohnsonmyc@gmail.com) Sent You a Personal Message

Mail received time: Fri, 8 Aug 2025 17:41:43

Sent: Fri, 08 Aug 2025 17:41:39

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

This is a wonderful project. Let's make sure that it has and causes minimal negative environmental impact.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Jamie Johnson
838 W End Ave Apt 5C
New York, NY 10025
jamiejohnsonnyc@gmail.com
(917) 834-3336

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:37:22 PM

From: [Sarah Brooks \(slstrake75@gmail.com\)](mailto:slstrake75@gmail.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 17:45:24

Sent: Fri, 08 Aug 2025 17:44:52

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Sarah Brooks
805 Dickinson Dr
Vestal, NY 13850
slstrake75@gmail.com
(607) 644-4673

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:37:30 PM

From:

Mail received time: Fri, 8 Aug 2025 17:46:34

Sent: Fri, 08 Aug 2025 17:46:28

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Environment! ENvironment! ENVIRONMENT!!

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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- Affordable and Abundant Water and Energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Sarah Gallagher
1136 1st Ave Apt 7
New York, NY 10065
uppergreenside@gmail.com
(212) 759-6447

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:37:38 PM

From: [Diane Gaertner \(dsg719@gmail.com\)](mailto:dsg719@gmail.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 17:47:38

Sent: Fri, 08 Aug 2025 17:46:51

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Diane Gaertner
11 Apple Ln
Commack, NY 11725
dsg719@gmail.com
(631) 864-7341

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:37:45 PM

From: [Moss Cleary \(mosscleary@gmail.com\)](mailto:mosscleary@gmail.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 17:47:57

Sent: Fri, 08 Aug 2025 17:47:51

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Moss Cleary
19 Farmbrook Drive
Farmington, NY 14843
mosscleary@gmail.com
(585) 491-1750

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:37:53 PM

From: [pamela.guyon \(singer1013@yahoo.com\)](mailto:pamela.guyon@singer1013@yahoo.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 17:50:43

Sent: Fri, 08 Aug 2025 17:50:39

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

pamela guyon
600 Island Cottage Rd Apt 220
Rochester, NY 14612
singer1013@yahoo.com
(585) 417-7340

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:38:01 PM

From: [Eric Bare \(trebares@juno.com\)](mailto:trebares@juno.com) Sent You a Personal Message

Mail received time: Fri, 8 Aug 2025 17:51:33

Sent: Fri, 08 Aug 2025 17:51:29

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thatandapos;s a lot to leave unaddressed!

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Eric Bare
1010 Powderhouse Rd
Vestal, NY 13850
trebares@juno.com
(607) 724-0824

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Archived: Monday, October 13, 2025 5:38:08 PM

From:

Mail received time: Fri, 8 Aug 2025 17:54:06

Sent: Fri, 08 Aug 2025 17:53:29

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Ecological problems should be addressed before the project begins.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Robert Almeida
377 Richard Ct
Pomona, NY 10970
robert.almeida75@gmail.com
(914) 325-0178

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:38:16 PM

From: [Deborah Porder \(dporder@gmail.com\)](mailto:dporder@gmail.com) Sent You a Personal Message

Mail received time: Fri, 8 Aug 2025 17:54:40

Sent: Fri, 08 Aug 2025 17:54:35

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

I am especially concerned about the enormous amounts of water and electricity that Micron will use. Outside of Atlanta, people living near a data center lost the water for their homes. In NY, our electric rates already are sky high. The huge demand for electricity from a data center will raise those rates. Energy from nuclear reactors is higher per kilowatt hour than energy from renewable sources like wind, solar, geothermal and hydro power. Yet Hochul andapos;s plan is to power the Micron plant with nuclear energy. Lastly, if a new nuclear reactor is built, it will become a permanent nuclear waste dump because there is nowhere to put the waste.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Deborah Porder
46 Lawrence Rd
Scarsdale, NY 10583
dporder@gmail.com
(914) 419-1044

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Archived: Monday, October 13, 2025 5:38:24 PM

From: [Patricia Matteson \(vlyhome@yahoo.com\)](mailto:vlyhome@yahoo.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 17:54:52

Sent: Fri, 08 Aug 2025 17:54:49

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

I have a number of Tonawanda Seneca friends who will be negatively affected by this proposed semiconductor project. The area chosen for the build out is literally adjacent to their reservation and apos;s nature preserve. The waters and tolls that will be negatively affected include theirs not to mention many persons and their families down stream from them. Maybe you all need to actually be friends will and identify yourselves as friends of these Senecas before you can have compassion for the destruction of their ONLY REMAINING lands, this after it was already taken over by white colonist New Yorkers. WHY allow more of their acres to be toxically affected? Can you imagine why not?

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Patricia Matteson
730 Mohonk Rd
High Falls, NY 12440
vlyhome@yahoo.com
(845) 687-4005

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:38:32 PM

From: [Sarah Benson \(majedufa@yahoo.com\)](mailto:majedufa@yahoo.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 17:58:07

Sent: Fri, 08 Aug 2025 17:57:21

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Sarah Benson
7 Bergen St
Brentwood, NY 11717
majedufa@yahoo.com
(631) 741-1780

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:38:40 PM

From:

Mail received time: Fri, 8 Aug 2025 17:59:56

Sent: Fri, 08 Aug 2025 17:56:53

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Gregory Brumfield
49 Antoinette Dr
Rochester, NY 14623
gregorybrumfield98@twc.com
(585) 290-9087

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:38:48 PM

From: [Daniel Lipson \(dnlipson@gmail.com\)](mailto:dnlipson@gmail.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 18:02:32

Sent: Fri, 08 Aug 2025 18:02:27

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Daniel Lipson
10 High Ridge Rd
New Paltz, NY 12561
dnlipson@gmail.com
(845) 206-9520

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:38:56 PM

From: [Kathleen Hannon \(katehannon@yahoo.com\)](mailto:katehannon@yahoo.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 18:03:35

Sent: Fri, 08 Aug 2025 18:02:27

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Although we are all excited to welcome Micron and the jobs and economic contributions to the area, I am concerned about our natural resources and the environmental impacts. These wetlands are home to so many species of plants and animals. We are hopeful that you can address these concerns.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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CHIPS Act.

- Affordable and Abundant Water and Energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Kathleen Hannon
1261 Williams Rd
Hubbardsville, NY 13355
katehannon@yahoo.com
(315) 373-1669

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:39:04 PM

From:

Mail received time: Fri, 8 Aug 2025 18:04:21

Sent: Fri, 08 Aug 2025 18:04:16

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Jessica Miracola
1132 Park Pl Apt 5
Brooklyn, NY 11213
nibbles-abettor0w@icloud.com
(941) 323-5852

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:39:11 PM

From:

Mail received time: Fri, 8 Aug 2025 18:05:01

Sent: Fri, 08 Aug 2025 18:04:58

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Michael Gelfer
345 Lake Shore Rd
Putnam Valley, NY 10579
mikenregina_204@comcast.net
(845) 526-1159

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:39:19 PM

From:

Mail received time: Fri, 8 Aug 2025 18:07:20

Sent: Fri, 08 Aug 2025 18:07:16

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Ruth Davidowitz
60 E 16th St
Huntington Station, NY 11746
ruthdavidowitz@gmail.com
(631) 424-2455

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:39:27 PM

From: [Laurie McCall \(ljmccall57@icloud.com\)](mailto:ljmccall57@icloud.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 18:08:19

Sent: Fri, 08 Aug 2025 18:08:15

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Please show us in detail how a great economic opportunity can be considerate of environmental—and therefore human—concerns.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Laurie McCall
476 Gardham Rd
Rochester, NY 14617
ljmccall57@icloud.com
(585) 943-7084

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Archived: Monday, October 13, 2025 5:39:35 PM

From: [Elana Mugdan \(lenkv1@aol.com\)](mailto:lenkv1@aol.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 18:10:42

Sent: Fri, 08 Aug 2025 18:09:55

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Elana Mugdan
25131 42nd Ave
Little Neck, NY 11363
lenkv1@aol.com
(718) 224-7256

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:39:43 PM

From: [Paul Meyers \(paulclarkmeyers@gmail.com\)](mailto:paulclarkmeyers@gmail.com) Sent You a Personal Message

Mail received time: Fri, 8 Aug 2025 18:13:09

Sent: Fri, 08 Aug 2025 18:13:02

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

I strongly believe that there should be plenty of time for the public to be informed about, understand, and comment on these very serious issues. The New York State environment - air, water and land - and our communities need to be protected,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

I urge consideration and response to the following issues and concerns:

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- Affordable and Abundant Water and Energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Paul Meyers
PO Box 294
Hannawa Falls, NY 13647
paulclarkemeyers@gmail.com
(973) 722-1354

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:39:51 PM

From: [Judith Natkins \(jlratkins@yahoo.com\)](mailto:jlratkins@yahoo.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 18:14:48

Sent: Fri, 08 Aug 2025 18:14:44

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Judith Natkins
7505 35th Ave Apt B11
Jackson Heights, NY 11372
jlnatkins@yahoo.com
(718) 651-3032

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:39:58 PM

From: [Alicia Tether \(astether@verizon.net\)](mailto:astether@verizon.net) Sent You a Personal Message

Mail received time: Fri, 8 Aug 2025 18:17:13

Sent: Fri, 08 Aug 2025 18:16:27

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Alicia Tether
722 Dogwood Hills Ter
Newburgh, NY 12550
astether@verizon.net
(845) 565-7522

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:40:06 PM

From: [Nivo Rovedo \(rovedonivo@optonline.net\)](mailto:rovedonivo@optonline.net) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 18:18:23

Sent: Fri, 08 Aug 2025 18:18:17

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

We need to be careful about what is being built and run in NYS, in order to avoid more harm to our ecosystems.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Nivo Rovedo
1 Sundance Rd
Lagrangeville, NY 12540
rovedonivo@optonline.net
(845) 223-5565

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:40:14 PM

From: [Bettina Hansel \(bghansel@aol.com\)](mailto:bghansel@aol.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 18:18:43

Sent: Fri, 08 Aug 2025 18:18:38

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

I am echoing the concerns raised by the Atlantic Chapter of the Sierra Club. I feel strong connection to Syracuse and the Finger Lakes region, having lived there while I earned my degree in geography at Syracuse University. It is so important to protect that environment.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Bettina Hansel
58 N Franklin St
Athens, NY 12015
bghansel@aol.com
(347) 407-2759

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:40:22 PM

From: [Robert Rose \(hannibal.kuvasz@gmail.com\)](mailto:Robert.Rose@hannibal.kuvasz@gmail.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 18:20:46

Sent: Fri, 08 Aug 2025 18:20:42

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Microchip Manufacturing is a must for the good of the nation. If some grief must be accommodated, remember it is for the good of the nation. Therefore, I am for the construction of this Factory.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Robert Rose
4019 E Main Street Rd
Attica, NY 14011
hannibal.kuvasz@gmail.com
(585) 738-3156

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Archived: Monday, October 13, 2025 5:40:31 PM

From: [Matthew Boguske \(mboguske@yahoo.com\)](mailto:mboguske@yahoo.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 18:23:08

Sent: Fri, 08 Aug 2025 18:23:02

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Matthew Boguske
7678 Park Ave
Lowville, NY 13367
mboguske@yahoo.com
(315) 621-5180

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Archived: Monday, October 13, 2025 5:40:39 PM

From: [James Kotchmar \(jkotch2003@yahoo.com\)](mailto:jkotch2003@yahoo.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 18:23:40

Sent: Fri, 08 Aug 2025 18:22:53

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

James Kotchmar
10 Woodlake Dr
Thiells, NY 10984
jkotch2003@yahoo.com
(845) 947-1356

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Archived: Monday, October 13, 2025 5:40:46 PM

From: [John Prybylski \(jpnycs46@yahoo.com\)](mailto:jpnycs46@yahoo.com) Sent You a Personal Message

Mail received time: Fri, 8 Aug 2025 18:23:48

Sent: Fri, 08 Aug 2025 18:23:00

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

ANOTHER SO-CALLED "JOB CREATOR" AT THE EXPENSE OF VITAL ENVIRONMENT WETLANDS, WATER, ETC...!!!! THESE PROJECTS SHOED IN BY HEADLINE GRABBING POLITICIANS WITH NO REGARD TO THE DESTRUCTION ALWAYS ARE HIDDEN, NOT MADE PUBLIC OR IGNORED...!!!! POLITICIANS ALWAYS "CLAIMING" (N.Y. DEMOCRATS) TO BE CONCERNED WITH PLANET DAMAGING ISSUES (FOSSIL FUELS, ELECTRIC VEHICLES and SCHOOL BUSES, AIR POLLUTION, ETC...!!) IGNORE THE DESTRUCTION WHEN A "JOB CREATOR" COMES ALONG...!!! PATHETIC, LYING FRAUDS...!!!! JUST THANKFUL THAT I DO NOT LIVE ANYWHERE NEAR THIS CHIP PLANT AND ALL IT'S POISON PRODUCING SIDE EFFECTS...!!!! OF COURSE POLITICAL STOOGES WILL PUSH THIS PROJECT AHEAD FOR PUBLICITY. CAMPAIGN DONATIONS, AND B.S. !!!! BOTTOM LINE = WE CAN NEVER ...!!!! TRUST OR BELIEVE ANY POLITICIAN , LEFT OR RIGHT , ANY LONGER...!!! THEY'RE IN IT FOR THEMSELVES = SCREW THE PUBLIC, SCREW OUR ENVIRONMENT , SCREW THE FUTURE OF ALL OUR CHILDREN/GRANDCHILDREN...!!!!!!!!!!!!!!!!!!!!!!!!!!!!

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

I urge consideration and response to the following issues and concerns:

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- Protection of Air, Water, and Workers: Microchip production requires numerous toxic chemicals, including PFAS "forever chemicals," but the DEIS does not provide sufficient detail on the types of chemicals that will be used or how continuous environmental monitoring and compliance will be enforced. The DEIS does not detail how Micron will minimize contamination of

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- Affordable and Abundant Water and Energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

John Prybylski
20 Mayberry Dr E
Buffalo, NY 14227
jpnycs46@yahoo.com
(716) 656-8051

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:40:54 PM

From: [David Kornreich \(dbkornrei@gmail.com\)](mailto:dbkornrei@gmail.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 18:25:21

Sent: Fri, 08 Aug 2025 18:24:47

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

David Kornreich
103 Redwood Dr
Syracuse, NY 13212
dbkornrei@gmail.com
(315) 458-4080

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:41:02 PM

From: [Evelyn Wackett \(even8r@yahoo.com\)](mailto:even8r@yahoo.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 18:28:47

Sent: Fri, 08 Aug 2025 18:28:42

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

STOP STAMP!! STOP MICRON!

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Evelyn Wackett
56 Military Rd Apt 1
Buffalo, NY 14207
even8r@yahoo.com
(716) 370-9962

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:41:09 PM

From: [Elaine Sperbeck \(ejsperbeck@yahoo.com\)](mailto:ejsperbeck@yahoo.com) Sent You a Personal Message

Mail received time: Fri, 8 Aug 2025 18:29:24

Sent: Fri, 08 Aug 2025 18:29:19

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

my voice as a person in the future 1. will it destroy the wetlands, thus affecting the biodiversity and water table?

2. will they ask for nuclear power? there is no safe plant

in the world (no place to put the waste, vulnerable to terror attacks--think 9/11 by plane and now drones) think about what Russia is doing to Chernobyl. Think about where the uranium is mined from. usually indigenous land.

3. I want to live in an environmentally safe place. this will pollute the air, water and land. We only have one planet how could anyone want to destroy it and expose the people to sickness and high expenses.

look at the track record for Dan Foss ,and Wolfsped.

When will Micon go the same way?

What will their pilot program from IDA be(30 years of no payments while I and the community suffer.

Who and for how much will the plant be insured for?

If an accident, how will the people be helped? We see the state of Fema now.

So, how will my life be changed in 50 years if this goes through?

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Elaine Sperbeck
618 E Monroe St
Little Falls, NY 13365
ejsperbeck@yahoo.com
(315) 823-2840

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:41:18 PM

From: [Krista Topp \(ktopp@stny.rr.com\)](mailto:ktopp@stny.rr.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 18:32:18

Sent: Fri, 08 Aug 2025 18:32:13

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

The Micron Project poses risks to the environment and health of citizens, please do a complete assessment of the negative impacts of the project. The project will have profoundly negative impacts and could cause significant harm to human health and the environment. It could violate New Yorkandapos;s environmental and public health standards.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Krista Topp
125 Birdsall St
Endicott, NY 13760
ktopp@stny.rr.com
(607) 786-3071

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:41:26 PM

From: [Joel Roemer \(jroemer9597@gmail.com\)](mailto:jroemer9597@gmail.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 18:37:25

Sent: Fri, 08 Aug 2025 18:36:38

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Joel Roemer
840 Rock Beach Rd
Rochester, NY 14617
jroemer9597@gmail.com
(585) 978-6527

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Archived: Monday, October 13, 2025 5:41:35 PM

From: [Debby Budny \(debrmlmt@aol.com\)](mailto:debrmlmt@aol.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 18:37:34

Sent: Fri, 08 Aug 2025 18:37:27

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Debby Budny
30 Nob Hill
Rochester, NY 14617
debrnlmt@aol.com
(585) 266-7149

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Archived: Monday, October 13, 2025 5:41:42 PM

From: [GloriaJean BERBERICH \(glj29@hotmail.com\)](mailto:glj29@hotmail.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 18:37:43

Sent: Fri, 08 Aug 2025 18:37:38

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

GloriaJean BERBERICH

346 Foch Blvd

Mineola, NY 11501

glj29@hotmail.com

(516) 742-4988

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:41:51 PM

From: [Arnold Talentino \(talentino@cortland.edu\)](mailto:talentino@cortland.edu) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 18:38:04

Sent: Fri, 08 Aug 2025 18:37:21

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Although the Micron project slated for Clay, N.Y can be looked upon as a potential economic boon for a large portion of Central of Central New York, production of the micro chips would cause numerous and far reaching deleterious environmental problems that have been detailed in a review of the DEIS. In the face of the Projectandapos;s environmental damage, the Micron Project oil Clay, NY will do far more harm than good.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

I urge consideration and response to the following issues and concerns:

- Water and Ecological Resources: The Micron project is slated to destroy hundreds of acres of wetlands that provide habitat for species and provide natural flood mitigation. The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds. Ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.

- Protection of Air, Water, and Workers: Microchip production requires numerous toxic chemicals, including PFAS "forever chemicals," but the DEIS does not provide sufficient detail on the types of chemicals that will be used or how continuous environmental monitoring and compliance will be enforced. The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the use of thousands of tons of hazardous chemicals in semiconductor production every year. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.

- Greenhouse Gases: The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar, and without relying on renewable energy credits or using renewable energy that

is already on the grid, to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

- Affordable and Abundant Water and Energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Arnold Talentino
38 Van Hoesen St
Cortland, NY 13045
talentino@cortland.edu
(607) 753-7994

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:41:58 PM

From: [Roy Berberich \(gloj29@gmail.com\)](mailto:gloj29@gmail.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 18:39:26

Sent: Fri, 08 Aug 2025 18:38:51

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Roy Berberich
346 Foch Blvd
Mineola, NY 11501
glj29@gmail.com
(516) 742-4988

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:42:06 PM

From: [Eric Chamama \(ericchamama1@gmail.com\)](mailto:ericchamama1@gmail.com) Sent You a Personal Message

Mail received time: Fri, 8 Aug 2025 18:42:44

Sent: Fri, 08 Aug 2025 18:41:56

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Eric Chamama
27 Barker Ave Apt 1003
White Plains, NY 10601
ericchamama1@gmail.com
(917) 566-5126

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:42:13 PM

From: [Karine Gordineer \(karine13@optonline.net\)](mailto:karine13@optonline.net) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 18:43:08

Sent: Fri, 08 Aug 2025 18:43:04

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Karine Gordineer
11 Shadow Ln
Hopewell Junction, NY 12533
karine13@optonline.net
(845) 265-3137

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:42:21 PM

From:

Mail received time: Fri, 8 Aug 2025 18:46:35

Sent: Fri, 08 Aug 2025 18:46:31

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

I grew up in Central New York and its environment and taxpayers are important to me.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Katharine Tussing
276 Linwood Ave Apt 49
Buffalo, NY 14209
kathytussing@yahoo.com
(716) 566-9588

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:42:28 PM

From: [Daniel Menter \(dan.menter@yahoo.com\)](mailto:dan.menter@yahoo.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 18:51:14

Sent: Fri, 08 Aug 2025 18:51:10

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

As a professional in the semiconductor industry for 25 years, I know the impacts that a fab can have on the local environment. I also know that chip manufacturers in the past have taken the correct measures to protect the environment from the hazards associated with this type of manufacturing. It's exciting to see the semiconductor industry come back to the US but let's do it the right way take care of the community and the people first and it will pay off for your business and everyone. Let's not trash our environment for the sake of the dollar. Think of the future of our cities, towns, and planet, and add world-class mitigation and prevention if you want to be world-class.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Daniel Menter
109 Wilmington St
Rochester, NY 14620
dan.menter@yahoo.com
(585) 622-3134

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:44:31 PM

From: [Donald Banaszak \(banazald@gmail.com\)](mailto:banazald@gmail.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 19:03:23

Sent: Fri, 08 Aug 2025 19:03:16

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Donald Banaszak
5331 Dean Rd
Stockton, NY 14784
banazald@gmail.com
(716) 640-3608

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:44:38 PM

From:

Mail received time: Fri, 8 Aug 2025 19:03:47

Sent: Fri, 08 Aug 2025 19:02:57

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Anthony Everitt
25a Hartman Hill Rd
Huntington, NY 11743
anthonyeveritt77@yahoo.com
(631) 662-4406

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Archived: Monday, October 13, 2025 5:44:47 PM

From: [Randy Gyory \(rgyory@ptd.net\)](mailto:rgyory@ptd.net) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 19:05:08

Sent: Fri, 08 Aug 2025 19:05:03

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

To put it bluntly, the DEIS is woefully inadequate. It does not address key question on the impact to ground and surface water, environmental impacts and worker safety. If these concerns cannot be addressed, the project should not go forward.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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- Affordable and Abundant Water and Energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Randy Gyory
700 Port Kent Rd
Dickinson Center, NY 12930
rgyory@ptd.net
(610) 751-3372

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:42:35 PM

From: [Karen Biesanz \(karenb13@gmail.com\)](mailto:karenb13@gmail.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 19:16:26

Sent: Fri, 08 Aug 2025 19:15:52

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

The production of microchips must be safe or there is no use making them

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Karen Biesanz
4 Rickey Farm Ln
Horseheads, NY 14845
karenb13@gmail.com
(607) 361-2431

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Archived: Monday, October 13, 2025 5:42:43 PM

From: [Jim Gross \(jimg1127@gmail.com\)](mailto:jimg1127@gmail.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 19:20:42

Sent: Fri, 08 Aug 2025 19:20:00

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Jim Gross
403 9th Ave
East Northport, NY 11731
jimg1127@gmail.com
(516) 359-2323

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:42:51 PM

From:

Mail received time: Fri, 8 Aug 2025 19:23:04

Sent: Fri, 08 Aug 2025 19:22:59

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Substitute a nuclear energy for other resources is not a sustainable alternative. It's just trading the problem of climate change for the problem nuclear waste, which is also unsustainable. Nuclear energy is excessively expensive and we have other forms of renewable energy that are not radioactive and are not so expensive and troublesome to the supplier and the public. We need to conserve what water we have left for human consumption, not for radioactive cooling systems. The environmental effects are not clear as much as we wish they were. Public subsidizing private companies with taxpayer money is not OK this company Should be working on reducing energy usage not drawing from the grid that is so desperately overused.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Roberta Clements
4 Stella Dr
Gardiner, NY 12525
robertaaclements@gmail.com
(845) 532-6400

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:42:58 PM

From: [Carl Cording \(cordingac2@gmail.com\)](mailto:cordingac2@gmail.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 19:23:28

Sent: Fri, 08 Aug 2025 19:22:57

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Carl Cording
38 S Clement Ave
Ravena, NY 12143
cordingac2@gmail.com
(518) 756-3036

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Archived: Monday, October 13, 2025 5:43:06 PM

From: [Danielle Hajdufi \(peagreen50s@yahoo.com\)](mailto:peagreen50s@yahoo.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 19:24:23

Sent: Fri, 08 Aug 2025 19:23:49

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

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Danielle Hajdufi
2003 Hemstreet Rd
East Aurora, NY 14052
peagreen50s@yahoo.com
(716) 907-2157

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From: Diane Basile (luckied@me.com) Sent You a Personal Message
<luckied@grsdelivery.com>
Sent: Friday, August 8, 2025 3:29 PM
To: chipsnepa
Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Diane Basile
7 Evert St
Huntington Station, NY 11746
luckied@me.com
(516) 249-7380

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Archived: Monday, October 13, 2025 5:43:13 PM

From: [Diane Basile \(luckied@me.com\)](mailto:luckied@me.com) Sent You a Personal Message

Mail received time: Fri, 8 Aug 2025 19:28:59

Sent: Fri, 08 Aug 2025 19:28:54

To: chipsnepa

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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Thank you for your consideration of my comments.

Sincerely,

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Diane Basile
7 Evert St
Huntington Station, NY 11746
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Archived: Monday, October 13, 2025 5:43:21 PM

From: [Susan alice Mufson \(sualmuf@gmail.com\)](mailto:sualmuf@gmail.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 19:32:06

Sent: Fri, 08 Aug 2025 19:30:53

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Susan alice Mufson
325 W 21st St
New York, NY 10011
sualmuf@gmail.com
(917) 847-1514

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:43:29 PM

From: [Benay Brotman \(benay.brotman@gmail.com\)](mailto:benay.brotman@gmail.com) Sent You a Personal Message

Mail received time: Fri, 8 Aug 2025 19:33:33

Sent: Fri, 08 Aug 2025 19:32:45

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Benay Brotman
295 E 163rd St
Bronx, NY 10451
benay.brotman@gmail.com
(202) 812-0113

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Archived: Monday, October 13, 2025 5:43:36 PM

From: James Mulder (jhmulder@aol.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 19:38:39

Sent: Fri, 08 Aug 2025 19:38:34

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

James Mulder
28 Sachson Pl
Wappingers Falls, NY 12590
jhmulder@aol.com
(845) 297-4286

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Archived: Monday, October 13, 2025 5:43:45 PM

From: [Jim Catalano \(jimcatalano1@gmail.com\)](mailto:jimcatalano1@gmail.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 19:40:35

Sent: Fri, 08 Aug 2025 19:40:31

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Jim Catalano
112 Terrace Ln
Hurley, NY 12443
jimcatalano1@gmail.com
(845) 853-4357

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:43:52 PM

From: [Jennifer Valentine \(faboo1028@gmail.com\)](mailto:faboo1028@gmail.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 19:42:09

Sent: Fri, 08 Aug 2025 19:41:36

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Jennifer Valentine
313 1st Ave
Massapequa Park, NY 11762
faboo1028@gmail.com
(516) 795-6379

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:44:00 PM

From: [Janet Burrows \(janiburrows@twcny.rr.com\)](mailto:janiburrows@twcny.rr.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 19:43:38

Sent: Fri, 08 Aug 2025 19:42:48

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

As a retired NYS science teacher, resident on the mainland St; Lawrence River for over 50 years and grandmother, and Board member of Save The River in Clayton NY, I have grave concerns regarding the health of not just waters of the immediate facility but the effects on Lake Ontario and ultimately the St. Lawrence River. PFAS and other regulated or not chemicals in manufacture must be monitored continually in the air, water and facility. In house workers deserve semi annual health monitoring for the same. Have you set alternative energy plans now not after, geothermal, wind, solar. Wetlands lost can be replaced with auxiliary created elsewhere acre for acre.

Time to ecologically MAGA UP. Make America Great Again environmentally!!

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Janet Burrows
17222 Blanchard Ln E
Clayton, NY 13624
jnjburrows@tweny.rr.com
(315) 489-2860

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Archived: Monday, October 13, 2025 5:44:08 PM

From:

Mail received time: Fri, 8 Aug 2025 19:45:40

Sent: Fri, 08 Aug 2025 19:45:37

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Amendment to the Bill of Rights of the NYS Constitution: "Each person shall have a right to clean air and water, and a healthful environment." I worked incredibly hard, especially during the Fall of 2021, to ensure that voters understood what the proposed "Green Amendment" was all about and to ask for their YES vote on the November ballot. And they DID vote YES - overwhelmingly - regardless of political party.

At the heart of this monstrous project with its woefully inadequate DEIS are critical questions about the rights of the people of NY to clean air, clean water, and a healthful environment. People must be given adequate time to comment on a project that will remove 445 acres of trees and shrubs, 200 acres of wetlands, and 8,000 linear feet of streams! It will affect lives, flora, and fauna in unimaginable ways, with lasting effects.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Natalie and Fred Polvere
41 Grandview Blvd
Yonkers, NY 10710
polverenatalie@gmail.com
(914) 779-3431

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:44:16 PM

From:

Mail received time: Fri, 8 Aug 2025 19:47:21

Sent: Fri, 08 Aug 2025 19:47:17

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Helene Walkowicz
217 Ripplewood Dr
Rochester, NY 14616
cowling.excess_5j@icloud.com
(585) 865-9282

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 5:44:23 PM

From: [Bob Jones \(robertjj47@proton.me\)](mailto:robertjj47@proton.me) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 19:48:00

Sent: Fri, 08 Aug 2025 19:46:55

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Bob Jones
PO Box 451
Pleasantville, NY 10570
robertjj47@proton.me
(914) 299-4700

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:10:39 PM

From: Jackie Raven (jackie_raven@hotmail.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 19:53:36

Sent: Fri, 08 Aug 2025 19:53:03

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources:** The Micron project is slated to destroy hundreds of acres of wetlands that provide habitat for species and provide natural flood mitigation. The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds. Ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
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- **Greenhouse Gases:** The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar, and without relying on renewable energy credits or using renewable energy that is already on the grid, to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.
- **Affordable and Abundant Water and Energy:** The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of

infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Jackie Raven
235 E 89th St
New York, NY 10128
jackie_raven@hotmail.com
(212) 722-8253

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:10:47 PM

From: [Nadine Koza \(snkosf@verizon.net\)](mailto:snkosf@verizon.net) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 19:53:56

Sent: Fri, 08 Aug 2025 19:53:49

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Nadine Koza
447 E 14th St Apt 7G
New York, NY 10009
snkosf@verizon.net
(212) 673-2078

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:10:54 PM

From: [Rachel Danzing \(rachdanzing@yahoo.com\)](mailto:rachdanzing@yahoo.com) Sent You a Personal Message

Mail received time: Fri, 8 Aug 2025 19:54:54

Sent: Fri, 08 Aug 2025 19:54:19

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

We need to be able to promote and support businesses in that area, as long as the process to protect our health and environment are protected, as continuing this process can do. There's nothing more important than protecting our world—that is the backbone necessary to live prosperous lives and protect your next generations. Thank you.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

I urge consideration and response to the following issues and concerns:

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CHIPS Act.

- Affordable and Abundant Water and Energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Rachel Danzing
538 16th St
Brooklyn, NY 11215
rachdanzing@yahoo.com
(347) 244-5789

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Archived: Monday, October 13, 2025 6:11:02 PM

From: [Robert Goetz \(mandysdady2003@yahoo.com\)](mailto:mandysdady2003@yahoo.com) Sent You a Personal Message

Mail received time: Fri, 8 Aug 2025 19:58:44

Sent: Fri, 08 Aug 2025 19:58:39

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Any negative environmental impact should mandate this project be canceled.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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- Affordable and Abundant Water and Energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Robert Goetz
19 Selden Dr
East Northport, NY 11731
mandysdady2003@yahoo.com
(631) 219-3084

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Archived: Monday, October 13, 2025 6:11:09 PM

From: [Janice Singer \(janesinger895@gmail.com\)](mailto:janesinger895@gmail.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 20:11:17

Sent: Fri, 08 Aug 2025 20:11:12

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Janice Singer
170 W End Ave Apt 2F
New York, NY 10023
janesinger895@gmail.com
(212) 799-8024

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Archived: Monday, October 13, 2025 6:11:17 PM

From: [Joseph M. Varon \(jvaron613@aol.com\)](mailto:jvaron613@aol.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 20:19:45

Sent: Fri, 08 Aug 2025 20:19:13

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Joseph M. Varon
244 Lindberg St
W Hempstead, NY 11552
jvaron613@aol.com
(516) 505-0447

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Archived: Monday, October 13, 2025 6:11:24 PM

From: [Doreen Tignanelli \(doreentig@aol.com\)](mailto:doreentig@aol.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 20:21:08

Sent: Fri, 08 Aug 2025 20:21:03

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Doreen Tignanelli
29 Colburn Dr
Poughkeepsie, NY 12603
doreentig@aol.com
(845) 462-0235

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Archived: Monday, October 13, 2025 6:11:32 PM

From: [Julie Klimpel \(bwk1@optonline.net\)](mailto:Julie.Klimpel@optonline.net) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 20:33:58

Sent: Fri, 08 Aug 2025 20:31:42

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Julie Klimpel
1098 Carll Dr
Bay Shore, NY 11706
bwk1@optonline.net
(631) 968-9589

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Archived: Monday, October 13, 2025 6:11:39 PM

From: [Kamrava Pirouz \(kamravap@vt.edu\)](mailto:kamravap@vt.edu) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 20:38:57

Sent: Fri, 08 Aug 2025 20:38:52

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

There is value in maintaining the environment, especially in areas a development can have such devastating impacts. Please relocate elsewhere. We all like to make money, but itandapos;s not the only thing that matters. This is our earth.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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- **Water and Ecological Resources:** The Micron project is slated to destroy hundreds of acres of wetlands that provide habitat for species and provide natural flood mitigation. The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds. Ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.

- **Protection of Air, Water, and Workers:** Microchip production requires numerous toxic chemicals, including PFAS "forever chemicals," but the DEIS does not provide sufficient detail on the types of chemicals that will be used or how continuous environmental monitoring and compliance will be enforced. The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the use of thousands of tons of hazardous chemicals in semiconductor production every year. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.

- **Greenhouse Gases:** The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar, and without relying on renewable energy credits or using renewable energy that is already on the grid, to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

- Affordable and Abundant Water and Energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Kamrava Pirouz
163 East 36th St
New York, NY 10016
kamravap@vt.edu
(301) 275-1858

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:11:47 PM

From: [George Dillman \(gjdthree@yahoo.com\)](mailto:gjdthree@yahoo.com) Sent You a Personal Message

Mail received time: Fri, 8 Aug 2025 20:44:09

Sent: Fri, 08 Aug 2025 20:43:34

To: chipsnepa

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

George Dillman
1309 N Cayuga St
Ithaca, NY 14850
gidthree@yahoo.com
(607) 241-5338

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:11:55 PM

From: [Jim Long \(jp.long@earthlink.net\)](mailto:jp.long@earthlink.net) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 20:54:34

Sent: Fri, 08 Aug 2025 20:54:30

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

I have seen first hand how intense development degrades downstream resources, water quality, and ecology. One must not confuse quantity (a DEIS too long to be digested in the allotted time) with quality.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Jim Long
136 Jersey Hill Rd
Ithaca, NY 14850
jp.long@earthlink.net
(607) 277-0957

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:11:55 PM

From: [Jim Long \(jp.long@earthlink.net\)](mailto:jp.long@earthlink.net) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 20:54:34

Sent: Fri, 08 Aug 2025 20:54:30

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Jim Long
136 Jersey Hill Rd
Ithaca, NY 14850
jp.long@earthlink.net
(607) 277-0957

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Archived: Monday, October 13, 2025 6:12:02 PM

From: [Lea McGowan \(lea.mcgowan@gmail.com\)](mailto:lea.mcgowan@gmail.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 20:54:54

Sent: Fri, 08 Aug 2025 20:54:49

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Americans value our clean air, water and natural green spaces. It is important to protect our natural resources as well when preparing and building new businesses!

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Lea McGowan
112 Lincoln Ave Apt 313
Bronx, NY 10454
lea.mcgowan@gmail.com
(646) 314-1268

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:12:09 PM

From: [Nora Gaines \(noracgaines@gmail.com\)](mailto:noracgaines@gmail.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 20:57:17

Sent: Fri, 08 Aug 2025 20:56:29

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

The Micron project would destroy hundreds of acres of wetlands that provide habitat for at risk species as well as natural flood mitigation. The DEIS fails to properly address water systems and ecological concerns, nor does it provide satisfactory plans to restore nearby wetlands and mitigate on site wetlands loss.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Nora Gaines
PO Box 811
New York, NY 10024
noracgaines@gmail.com
(212) 875-4457

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:12:17 PM

From: [Carol McCord \(carolm@fastmail.com\)](mailto:carolm@fastmail.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 21:05:54

Sent: Fri, 08 Aug 2025 21:05:51

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Carol McCord
856 St Davids Ln
Schenectady, NY 12309
carolm@fastmail.com
(518) 898-1015

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:12:24 PM

From: [Frank J Bryant \(fbryant@optonline.net\)](mailto:fbryant@optonline.net) Sent You a Personal Message

Mail received time: Fri, 8 Aug 2025 21:07:08

Sent: Fri, 08 Aug 2025 21:06:32

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Frank J Bryant

7 Brook Pl

East Islip, NY 11730

fjbryant@optonline.net

(631) 882-2488

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:12:34 PM

From: [Andrea Zinn \(andrea_zinn050@aol.com\)](mailto:andrea_zinn@aol.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 21:08:07

Sent: Fri, 08 Aug 2025 21:06:31

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Andrea Zinn
629 E 24th St
Brooklyn, NY 11210
andrezinn050@aol.com
(718) 434-7952

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:12:41 PM

From: [Jayni Chase \(jayni@cjchase.org\)](mailto:jayni@cjchase.org) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 21:09:00

Sent: Fri, 08 Aug 2025 21:08:12

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Jayni Chase
PO Box 257
Bedford, NY 10506
jayni@cjchase.org
(914) 643-7644

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:12:49 PM

From: [Thyais Brown-Newball \(tnadji@gmail.com\)](mailto:tnadji@gmail.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 21:21:56

Sent: Fri, 08 Aug 2025 21:21:20

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Thyais Brown-Newball
480 Lefferts Ave
Brooklyn, NY 11225
tnadji@gmail.com
(718) 773-2156

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:12:56 PM

From:

Mail received time: Fri, 8 Aug 2025 21:31:01

Sent: Fri, 08 Aug 2025 21:30:21

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

WE MUST PROTECT the habitat and the diversity of environment to maintain a healthy biodiversity,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Victoriatheaterarts@gmail.com Oltarsh
16 Washington St
Nyack, NY 10960
victoriatheaterarts@gmail.com
(212) 247-6152

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:13:04 PM

From: [Cornelia Marsh \(conniemarsh6@gmail.com\)](mailto:conniemarsh6@gmail.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 21:40:17

Sent: Fri, 08 Aug 2025 21:39:28

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Cornelia Marsh
1354 Cumberland Head Rd
Plattsburgh, NY 12901
conniemarsh6@gmail.com
(518) 561-6378

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:13:11 PM

From: [K Julianne Jackson \(rjdjackson@aol.com\)](mailto:rjdjackson@aol.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 21:42:57

Sent: Fri, 08 Aug 2025 21:42:22

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

K Julianne Jackson
1 Westbourne Apt 4B
Bronxville, NY 10708
rjdjackson@aol.com
(914) 961-4054

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:13:19 PM

From: [Sylvie Russo \(nouelrusso@aol.com\)](mailto:nouelrusso@aol.com) Sent You a Personal Message

Mail received time: Fri, 8 Aug 2025 21:56:02

Sent: Fri, 08 Aug 2025 21:55:57

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Be mindful of the future 50years consequence on our health and the future

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Sylvie Russo
30 Herbert Ave
Port Washington, NY 11050
nouelrusso@aol.com
(516) 883-5634

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:13:27 PM

From: [William Gillen \(wpatgillen@gmail.com\)](mailto:wpatgillen@gmail.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 21:57:44

Sent: Fri, 08 Aug 2025 21:57:38

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

New York State must take environmental factors into consideration when approving major industrial facilities

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

William Gillen
305 W 28th St Apt 2C
New York, NY 10001
wpatgillen@gmail.com
(212) 633-0031

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:13:34 PM

From: [David Rosenfeld \(dvdlr6314@gmail.com\)](mailto:dvdlr6314@gmail.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 22:04:08

Sent: Fri, 08 Aug 2025 22:03:32

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

David Rosenfeld
1746 Ocean Ave # 3
Brooklyn, NY 11230
dvdlr6314@gmail.com
(646) 821-6651

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:13:42 PM

From:

Mail received time: Fri, 8 Aug 2025 22:08:02

Sent: Fri, 08 Aug 2025 22:07:56

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

I urge consideration and response to the following issues and concerns:

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- **Affordable and Abundant Water and Energy:** The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of

infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Elizabeth Tanner
84 Verplanck Ave
Beacon, NY 12508
wildchildliz13@yahoo.com
(914) 838-0000

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:13:49 PM

From: [Richard Mandigo \(richmanr1@yahoo.com\)](mailto:richmanr1@yahoo.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 22:09:44

Sent: Fri, 08 Aug 2025 22:09:13

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Richard Mandigo
84 Verplanck Ave
Beacon, NY 12508
richmanr1@yahoo.com
(845) 838-0000

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Archived: Monday, October 13, 2025 6:13:56 PM

From:

Mail received time: Fri, 8 Aug 2025 22:11:32

Sent: Fri, 08 Aug 2025 22:10:56

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Terrie Schmearer
1623 County Route 7A
Copake, NY 12516
terrieann.schmearer@icloud.com
(518) 329-5297

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:14:04 PM

From: [Lizbeth Giletto \(lizkeefenyc@gmail.com\)](mailto:lizkeefenyc@gmail.com) Sent You a Personal Message

Mail received time: Fri, 8 Aug 2025 22:20:27

Sent: Fri, 08 Aug 2025 22:19:50

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Lizbeth Giletto
484 W 43rd St Apt 18N
New York, NY 10036
lizkeefenyc@gmail.com
(646) 232-5360

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:14:12 PM

From: [Brigid Vele \(brigidvele@yahoo.com\)](mailto:brigidvele@yahoo.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 22:24:29

Sent: Fri, 08 Aug 2025 22:23:42

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Brigid Vele
134 Lyman Rd
East Patchogue, NY 11772
brigidvele@yahoo.com
(631) 286-4619

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Archived: Monday, October 13, 2025 6:14:20 PM

From: [Eva Marks \(evamecura@hotmail.com\)](mailto:evamecura@hotmail.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 22:38:22

Sent: Fri, 08 Aug 2025 22:38:19

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Eva Marks
420 Glen Ave
Scotia, NY 12302
evamcura@hotmail.com
(518) 421-1494

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Archived: Monday, October 13, 2025 6:14:28 PM

From:

Mail received time: Fri, 8 Aug 2025 22:49:56

Sent: Fri, 08 Aug 2025 22:49:07

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Derrick Tingley
234 Ruth St
Minoa, NY 13116
derricktingley@yahoo.com
(315) 656-3746

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Archived: Monday, October 13, 2025 6:14:35 PM

From:

Mail received time: Fri, 8 Aug 2025 22:56:03

Sent: Fri, 08 Aug 2025 22:55:27

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Vincent Ditizio
233 Ilyssa Way
Staten Island, NY 10312
theapocalypsewithin@gmail.com
(718) 317-1842

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Archived: Monday, October 13, 2025 6:14:43 PM

From: [Susan Halloran \(sjhalloran@yahoo.com\)](mailto:sjhalloran@yahoo.com) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 23:16:28

Sent: Fri, 08 Aug 2025 23:15:58

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Given the challenges facing the environment we should be providing incentives for ecologically positive (or, at least, benign) industries. Our water, air and soil are endangered by pollution, exploitation and over use. NY must make sure that Micron is mindful in their use of our natural resources.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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CHIPS Act.

- Affordable and Abundant Water and Energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Susan Halloran
521 Madison Ln
Hamilton, NY 13346
sjhalloran@yahoo.com
(315) 228-8387

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:14:51 PM

From: [Alfred Wheaton \(alfiel@hotmail.com\)](mailto:alfiel@hotmail.com) Sent You a Personal Message

Mail received time: Fri, 8 Aug 2025 23:30:24

Sent: Fri, 08 Aug 2025 23:29:48

To: chipsnepa

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources:** The Micron project is slated to destroy hundreds of acres of wetlands that provide habitat for species and provide natural flood mitigation. The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds. Ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
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- **Affordable and Abundant Water and Energy:** The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of

infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Alfred Wheaton
7249 Old State Rd
Addison, NY 14801
alfie1_@hotmail.com
(607) 359-3998

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:14:58 PM

From: [Barbara Lynch \(bdl5@cornell.edu\)](mailto:bdl5@cornell.edu) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 23:45:16

Sent: Fri, 08 Aug 2025 23:45:08

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

As a hiker, swimmer, and long-term resident of the Finger Lakes region, I care deeply about maintaining its reasonably decent environmental quality. We need to ensure that Micron Technology does not act in a way that threatens our land and water resources.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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CHIPS Act.

- Affordable and Abundant Water and Energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Barbara Lynch
406 E. Buffalo Street
NY, NY 14850
bd15@cornell.edu
(607) 539-7736

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:15:06 PM

From:

Mail received time: Fri, 8 Aug 2025 23:47:52

Sent: Fri, 08 Aug 2025 23:46:37

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Madeleine Glick
22 Berrybush Ln
Hastings on Hudson, NY 10706
mjgrdnutrition@yahoo.com
(518) 567-7102

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:15:14 PM

From: [Gary Klee \(kleemeister@aol.com\)](mailto:kleemeister@aol.com) Sent You a Personal Message

Mail received time: Fri, 8 Aug 2025 23:50:46

Sent: Fri, 08 Aug 2025 23:50:41

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Gary Klee
6 Jodon Dr
East Greenbush, NY 12061
kleemeister@aol.com
(518) 522-5734

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:15:22 PM

From: [Mg D \(rekced@duck.com\)](mailto:rekced@duck.com) Sent You a Personal Message

Mail received time: Fri, 8 Aug 2025 23:50:50

Sent: Fri, 08 Aug 2025 23:50:19

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Mg D
123 Pinebrook Dr
Hyde Park, NY 12538
rekced@duck.com
(845) 473-3123

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Archived: Monday, October 13, 2025 6:15:30 PM

From: [Judith Weis \(jweis@newark.rutgers.edu\)](mailto:jweis@newark.rutgers.edu) [Sent You a Personal Message](#)

Mail received time: Fri, 8 Aug 2025 23:53:10

Sent: Fri, 08 Aug 2025 23:53:07

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

As an aquatic biologist who studies wetlands, I am particularly distressed that this project would destroy hundreds of acres of wetlands, which provide habitat for many species and serve to prevent/reduce flooding. These issues are not addressed in the DEIS.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Judith Weis
16 Bell Rd
East Hampton, NY 11937
jweis@newark.rutgers.edu
(631) 324-6549

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:15:38 PM

From:

Mail received time: Sat, 9 Aug 2025 00:04:58

Sent: Sat, 09 Aug 2025 00:04:25

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Allison DeVecchio
8531 Old Towne Path
Cicero, NY 13039
allisondelvecchio24@gmail.com
(315) 243-1113

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:15:45 PM

From: [Amy Schimel \(mythandritual@mac.com\)](mailto:mythandritual@mac.com) [Sent You a Personal Message](#)

Mail received time: Sat, 9 Aug 2025 00:09:10

Sent: Sat, 09 Aug 2025 00:09:02

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

We can no longer ignore the impact that large scale building and manufacturing has on our air, water and the ecosystem all of our lives depends on.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Amy Schimel
134 Powers St Apt 2B
Brooklyn, NY 11211
mythandritual@mac.com
(347) 916-0895

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Archived: Monday, October 13, 2025 6:15:53 PM

From:

Mail received time: Sat, 9 Aug 2025 00:22:46

Sent: Sat, 09 Aug 2025 00:22:11

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources:** The Micron project is slated to destroy hundreds of acres of wetlands that provide habitat for species and provide natural flood mitigation. The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds. Ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
- **Protection of Air, Water, and Workers:** Microchip production requires numerous toxic chemicals, including PFAS "forever chemicals," but the DEIS does not provide sufficient detail on the types of chemicals that will be used or how continuous environmental monitoring and compliance will be enforced. The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the use of thousands of tons of hazardous chemicals in semiconductor production every year. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
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- **Affordable and Abundant Water and Energy:** The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of

infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Christine Schmitthener
241 Hungry Hollow Rd
Chestnut Ridge, NY 10977
chriswhf@yahoo.com
(301) 472-4123

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:16:03 PM

From: [Pat Caprood \(cpetesurf@aol.com\)](mailto:cpetesurf@aol.com) [Sent You a Personal Message](#)

Mail received time: Sat, 9 Aug 2025 00:53:57

Sent: Sat, 09 Aug 2025 00:53:25

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Pat Caprood
12 Mt McGregor Rd
Gansevoort, NY 12831
cpetesurf@aol.com
(518) 223-6219

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:16:11 PM

From: [Cory Hall \(coryrose84@aol.com\)](mailto:coryrose84@aol.com) [Sent You a Personal Message](#)

Mail received time: Sat, 9 Aug 2025 01:19:00

Sent: Sat, 09 Aug 2025 01:18:27

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Cory Hall
94 Old Coach Rd
Clifton Park, NY 12065
coryrose84@aol.com
(518) 373-8856

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:16:20 PM

From: [Diane Morrell \(jmorrell5@verizon.net\)](mailto:jmorrell5@verizon.net) [Sent You a Personal Message](#)

Mail received time: Sat, 9 Aug 2025 01:23:38

Sent: Sat, 09 Aug 2025 01:23:05

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Diane Morrell
197 Salzburg Vlg
Palmyra, NY 14522
jmorrell5@verizon.net
(315) 597-9560

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:16:28 PM

From: [Lisa Gutheil \(ligutheil@gmail.com\)](mailto:ligutheil@gmail.com) [Sent You a Personal Message](#)

Mail received time: Sat, 9 Aug 2025 01:34:34

Sent: Sat, 09 Aug 2025 01:33:57

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Lisa Gutheil
8 Seneca Dr
Averill Park, NY 12018
ligutheil@gmail.com
(518) 669-2360

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Archived: Monday, October 13, 2025 6:16:35 PM

From: [Patti Packer \(pattiac@nycap.rr.com\)](mailto:pattiac@nycap.rr.com) [Sent You a Personal Message](#)

Mail received time: Sat, 9 Aug 2025 01:39:52

Sent: Sat, 09 Aug 2025 01:39:18

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Patti Packer
5 Jennifer Rd
Scotia, NY 12302
pattiac@nycap.rr.com
(518) 399-4843

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Archived: Monday, October 13, 2025 6:16:42 PM

From: [Douglas Nielsen \(doungail47@yahoo.com\)](mailto:doungail47@yahoo.com) [Sent You a Personal Message](#)

Mail received time: Sat, 9 Aug 2025 01:44:53

Sent: Sat, 09 Aug 2025 01:44:03

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Douglas Nielsen
150 Old Liverpool Rd Apt 602
Liverpool, NY 13088
dougngail47@yahoo.com
(315) 345-8115

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Archived: Monday, October 13, 2025 6:16:50 PM

From: [G Eric Scott \(void-oatmeal0q@icloud.com\) Sent You a Personal Message](mailto:G Eric Scott (void-oatmeal0q@icloud.com) Sent You a Personal Message)

Mail received time: Sat, 9 Aug 2025 01:56:15

Sent: Sat, 09 Aug 2025 01:56:09

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

We need to be careful of water and ecological resources, and avoid damaging air, water, and workers.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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- Affordable and Abundant Water and Energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

G Eric Scott
215 Rosa Rd
Schenectady, NY 12308
void-oatmeal0q@icloud.com
(518) 372-3206

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Archived: Monday, October 13, 2025 6:16:58 PM

From: [Erick Muller \(erickmuller2@aol.com\)](mailto:erickmuller2@aol.com) [Sent You a Personal Message](#)

Mail received time: Sat, 9 Aug 2025 02:07:26

Sent: Sat, 09 Aug 2025 02:07:23

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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- **Affordable and Abundant Water and Energy:** The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of

infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Erick Muller
19 W 3rd St
Patchogue, NY 11772
erickmuller2@aol.com
(631) 664-0925

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:17:05 PM

From: [Cynde McCloskey \(cynde6@juno.com\)](mailto:cynde6@juno.com) [Sent You a Personal Message](#)

Mail received time: Sat, 9 Aug 2025 02:17:09

Sent: Sat, 09 Aug 2025 02:16:37

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Cynde McCloskey
87 Shoshone St
Buffalo, NY 14214
cynde6@juno.com
(716) 445-8336

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:17:13 PM

From: [Donald Lathrop \(dlathrop@berkshirecc.edu\)](mailto:dlathrop@berkshirecc.edu) Sent You a Personal Message

Mail received time: Sat, 9 Aug 2025 02:25:30

Sent: Sat, 09 Aug 2025 02:25:25

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Sierra Clubs concerns should be addressed.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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- Affordable and Abundant Water and Energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Donald Lathrop
10 Dean Hill Rd
Canaan, NY 12029
dlathrop@berkshirecc.edu
(518) 781-4681

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:17:20 PM

From: [Cillon Mckenley \(csbmck@netscape.net\)](mailto:csbmck@netscape.net) Sent You a Personal Message

Mail received time: Sat, 9 Aug 2025 02:28:15

Sent: Sat, 09 Aug 2025 02:28:06

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

New York appreciates progress and employment opportunities. However, the potential risk to human life because of toxic substances, and harmful environmental impacts. Serious consideration should be given to all stakeholders and input before any final decisions are made.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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CHIPS Act.

- Affordable and Abundant Water and Energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Cillon Mckenley
33 Saint Pauls Pl
Mount Vernon, NY 10550
csbmck@netscape.net
(914) 664-1723

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:17:28 PM

From: [Anne Nelson \(doghappy33@hotmail.com\)](mailto:doghappy33@hotmail.com) [Sent You a Personal Message](#)

Mail received time: Sat, 9 Aug 2025 02:38:56

Sent: Sat, 09 Aug 2025 02:38:23

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Anne Nelson
9 Lark Dr
Woodstock, NY 12498
doghappy33@hotmail.com
(845) 417-5737

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:17:36 PM

From: [Dianne Ferriss \(df14@cornell.edu\)](mailto:df14@cornell.edu) [Sent You a Personal Message](#)

Mail received time: Sat, 9 Aug 2025 02:54:08

Sent: Sat, 09 Aug 2025 02:53:32

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Dianne Ferriss
201 2nd St
Ithaca, NY 14850
df14@cornell.edu
(607) 272-6896

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:17:44 PM

From: [Joanne Scanlon \(joscanlon62@gmail.com\)](mailto:joscanlon62@gmail.com) [Sent You a Personal Message](#)

Mail received time: Sat, 9 Aug 2025 03:28:00

Sent: Sat, 09 Aug 2025 03:27:52

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Joanne Scanlon
104 Tottenham Rd
Rochester, NY 14609
joscanlon62@gmail.com
(585) 269-8423

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:17:51 PM

From:

Mail received time: Sat, 9 Aug 2025 03:31:03

Sent: Sat, 09 Aug 2025 03:30:58

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Annajeon Morales
3981 47th St
Sunnyside, NY 11104
annajeangrace@yahoo.com
(718) 472-4460

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:17:59 PM

From: [Jill M. Marcus \(jill.marcus64@gmail.com\)](mailto:jill.marcus64@gmail.com) [Sent You a Personal Message](#)

Mail received time: Sat, 9 Aug 2025 03:56:06

Sent: Sat, 09 Aug 2025 03:56:00

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Jill M. Marcus
464 Main Street, Apt 208,
Port Washington, NY 11050
jill.marcus64@gmail.com
(516) 244-0864

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:18:06 PM

From: [Sharon Nolting \(sharonmolting1@gmail.com\)](mailto:sharonmolting1@gmail.com) Sent You a Personal Message

Mail received time: Sat, 9 Aug 2025 04:02:31

Sent: Sat, 09 Aug 2025 04:02:26

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

I urge consideration and response to the following issues and concerns:

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- **Greenhouse Gases:** The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar, and without relying on renewable energy credits or using renewable energy that is already on the grid, to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.
- **Affordable and Abundant Water and Energy:** The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of

infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Sharon Nolting
348 E 9th St Apt 13
New York, NY 10003
sharonnolting1@gmail.com
(212) 982-8745

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:18:14 PM

From: [Carol McLoughlin \(themclcats@gmail.com\)](mailto:themclcats@gmail.com) Sent You a Personal Message

Mail received time: Sat, 9 Aug 2025 05:03:24

Sent: Sat, 09 Aug 2025 05:03:20

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Carol Mcloughlin
915 166th St Apt 5C
Whitestone, NY 11357
themclcats@gmail.com
(718) 357-8155

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:18:22 PM

From: [Rose Marie Wilson \(rmwilson32@gmail.com\)](mailto:rmwilson32@gmail.com) [Sent You a Personal Message](#)

Mail received time: Sat, 9 Aug 2025 05:17:58

Sent: Sat, 09 Aug 2025 05:17:53

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

This plant must not be approved if they cannot show how they will protect the environment from "forever" chemicals. Furthermore, it should not be allowed to destroy 100s of acres of wetlands! Wetlands are important ecological features that help mitigate storms and excess rainfall, and which provide habitat for 100s of species of wildlife. If this plant cannot be built without destroying these habitats, then it should NOT be built, period!

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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- Affordable and Abundant Water and Energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Rose Marie Wilson
875 Jerusalem Ave Unit 11
Uniondale, NY 11553
rmwilson32@gmail.com
(516) 605-1769

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:18:29 PM

From: [Marilyn Berkon \(marbkn@aol.com\)](mailto:marbkn@aol.com) [Sent You a Personal Message](#)

Mail received time: Sat, 9 Aug 2025 05:24:01

Sent: Sat, 09 Aug 2025 05:23:21

To: chipsnepa

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Marilyn Berkon
135 Willow St
Brooklyn, NY 11201
marbkn@aol.com
(718) 858-4968

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:18:37 PM

From:

Mail received time: Sat, 9 Aug 2025 05:36:44

Sent: Sat, 09 Aug 2025 05:36:08

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Mallory Rutigliano
16040 24th Ave
Whitestone, NY 11357
mwirutigliano@gmail.com
(631) 617-1457

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:18:44 PM

From: [Karen Keavey \(karenkeavey@gmail.com\)](mailto:karenkeavey@gmail.com) [Sent You a Personal Message](#)

Mail received time: Sat, 9 Aug 2025 06:44:58

Sent: Sat, 09 Aug 2025 06:44:52

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Big mistake here plus inefficient reports on the impact of this facility on the environment and for humans who live in the area.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Karen Keavey
305 E 24th St Apt 17F
New York, NY 10010
karenkeavey@gmail.com
(917) 757-0372

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:18:52 PM

From: [Deborah Slattery \(mainething04@aol.com\)](mailto:Deborah_Slattery@mainething04@aol.com) [Sent You a Personal Message](#)

Mail received time: Sat, 9 Aug 2025 09:10:03

Sent: Sat, 09 Aug 2025 09:09:33

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

I am asking you (corporate America) to consider for a moment, just one moment and ponder why? Those in power the billionaires of America, are scrambling to find sustainable life on Mars. It is because they know we are destroying our planet here on Earth.

No doubt!

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Deborah Slattery
535 Sandy Plains Rd
Leeds, NY 12451
mainething04@aol.com
(347) 827-5627

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Archived: Monday, October 13, 2025 6:19:00 PM

From: [Mark Sarnacki \(ironmark500@yahoo.com\)](mailto:ironmark500@yahoo.com) Sent You a Personal Message

Mail received time: Sat, 9 Aug 2025 10:02:28

Sent: Sat, 09 Aug 2025 10:01:42

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

A healthy environment goes hand in hand with a strong economy.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Mark Sarnacki
2 Robin Ln
Troy, NY 12180
ironmark500@yahoo.com
(518) 788-8869

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:19:08 PM

From: [Judy Lieblein \(judylikein@hotmail.com\)](mailto:judylikein@hotmail.com) [Sent You a Personal Message](#)

Mail received time: Sat, 9 Aug 2025 10:24:57

Sent: Sat, 09 Aug 2025 10:24:26

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Judy Lieblein
3523 W Seneca Tpke
Syracuse, NY 13215
judylieblein@hotmail.com
(315) 345-2245

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:19:15 PM

From:

Mail received time: Sat, 9 Aug 2025 11:15:30

Sent: Sat, 09 Aug 2025 11:14:48

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Charlee Ray Price
79A Cooper St
Brooklyn, NY 11207
charleeray@hotmail.com
(646) 385-4669

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:19:23 PM

From: [Debra Naumovitz \(psychopractor@aol.com\)](mailto:Debra.Naumovitz@psychopractor@aol.com) Sent You a Personal Message

Mail received time: Sat, 9 Aug 2025 11:30:29

Sent: Sat, 09 Aug 2025 11:30:22

To: chipsnepa

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Debra Naumovitz
6015 Johnston Rd
Slingerlands, NY 12159
psychopractor@aol.com
(518) 526-2677

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Archived: Monday, October 13, 2025 6:19:31 PM

From: [Barbara Vitale \(bcbrez@msn.com\)](mailto:barbara.vitale@msn.com) [Sent You a Personal Message](#)

Mail received time: Sat, 9 Aug 2025 11:46:24

Sent: Sat, 09 Aug 2025 11:46:18

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Barbara Vitale
830 Shore Rd Apt 4D
Long Beach, NY 11561
bcbrez@msn.com
(516) 889-7410

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:19:38 PM

From: [Diane Wallace \(dlw810@gmail.com\)](mailto:dlw810@gmail.com) [Sent You a Personal Message](#)

Mail received time: Sat, 9 Aug 2025 12:21:44

Sent: Sat, 09 Aug 2025 12:21:14

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

I support efforts of the Sierra Club to demand more attention and commitment in safeguarding our environment in the face of Micronandapos;s massive undertaking.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Diane Wallace
119 Ithaca Rd
Ithaca, NY 14850
dlw810@gmail.com
(607) 592-7721

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:19:46 PM

From: [Anne Ramsden \(ramsdenam@gmail.com\)](mailto:ramsdenam@gmail.com) [Sent You a Personal Message](#)

Mail received time: Sat, 9 Aug 2025 12:31:09

Sent: Sat, 09 Aug 2025 12:30:31

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

I am concerned about the project's effects on waterways and the habitats leaving birds and more harmed

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Anne Ramsden
28 Maple St Unit 301
Marcellus, NY 13108
ramsdenam@gmail.com
(865) 430-9183

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:19:53 PM

From: [Pete Klosterman \(pete_k@pacbell.net\)](mailto:pete_k@pacbell.net) [Sent You a Personal Message](#)

Mail received time: Sat, 9 Aug 2025 12:35:30

Sent: Sat, 09 Aug 2025 12:34:11

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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Thank you for your consideration of my comments.

Sincerely,

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Pete Klosterman
27 Maple Brook Rd
Tuxedo Park, NY 10987
pete_k@pacbell.net
(510) 384-0627

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Archived: Monday, October 13, 2025 6:20:01 PM

From: [Brenda Chapman \(red22chap@gmail.com\)](mailto:red22chap@gmail.com) [Sent You a Personal Message](#)

Mail received time: Sat, 9 Aug 2025 12:36:22

Sent: Sat, 09 Aug 2025 12:35:48

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

We do need good jobs in CNY, but the laws must be followed. Hold Micron responsible to protect itandapos;s employees, the public, wild animals and our lands! You also have a responsibility and a moral obligation to represent and protect your constituency, the places where we live, and the future for our children.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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Thank you for your consideration of my comments.

Sincerely,

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Brenda Chapman
11 Beaver Way
West Monroe, NY 13167
red22chap@gmail.com
(315) 668-1504

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Archived: Monday, October 13, 2025 6:20:10 PM

From: [Jane Bloom \(jbloom507@gmail.com\)](mailto:jbloom507@gmail.com) [Sent You a Personal Message](#)

Mail received time: Sat, 9 Aug 2025 13:28:17

Sent: Sat, 09 Aug 2025 13:27:45

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Jane Bloom
70 Jewels Ct
New Paltz, NY 12561
jbloom507@gmail.com
(917) 612-5671

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:20:17 PM

From:

Mail received time: Sat, 9 Aug 2025 13:31:19

Sent: Sat, 09 Aug 2025 13:31:13

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

I urge consideration and response to the following issues and concerns:

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Jennifer Marinilli
2970 Emo Rd
Wayland, NY 14572
jmarinilli@frontiernet.net
(585) 728-3503

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:20:25 PM

From: [Karen Thomas \(ktcatlover@verizon.net\)](mailto:ktcatlover@verizon.net) [Sent You a Personal Message](#)

Mail received time: Sat, 9 Aug 2025 13:32:27

Sent: Sat, 09 Aug 2025 13:31:55

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Karen Thomas
126 Garden St
Garden City, NY 11530
ktcatlover@verizon.net
(516) 877-0913

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:20:32 PM

From: [Jen Horowitz \(jenhorowitz3@gmail.com\)](mailto:jenhorowitz3@gmail.com) [Sent You a Personal Message](#)

Mail received time: Sat, 9 Aug 2025 14:48:42

Sent: Sat, 09 Aug 2025 14:48:09

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Jen Horowitz
55 Bonnie Meadow Rd
Scarsdale, NY 10583
jenhorowitz3@gmail.com
(914) 261-3541

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:20:40 PM

From:

Mail received time: Sat, 9 Aug 2025 14:51:26

Sent: Sat, 09 Aug 2025 14:51:18

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

THIS IS NOT OK!!

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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- Affordable and Abundant Water and Energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Abigail Mueller
2343 24th St # 2
Astoria, NY 11105
abigailmueller@yahoo.com
(917) 325-9925

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:20:48 PM

From: [Chandra Darice \(chandra_nyc@hotmail.com\)](mailto:chandra_nyc@hotmail.com) Sent You a Personal Message

Mail received time: Sat, 9 Aug 2025 14:54:21

Sent: Sat, 09 Aug 2025 14:54:14

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Chandra Darice
9 Avenue A
New York, NY 10009
chandra_nyc@hotmail.com
(212) 243-3091

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:20:55 PM

From: [James Shawver \(jshawver@mac.com\)](mailto:jshawver@mac.com) [Sent You a Personal Message](#)

Mail received time: Sat, 9 Aug 2025 15:25:10

Sent: Sat, 09 Aug 2025 15:24:37

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

James Shawver
455 Merchants Rd
Rochester, NY 14609
jshawver@mac.com
(585) 999-9999

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:21:03 PM

From: [Dennis Knaack \(knaackdennis@yahoo.com\)](mailto:knaackdennis@yahoo.com) Sent You a Personal Message

Mail received time: Sat, 9 Aug 2025 15:45:36

Sent: Sat, 09 Aug 2025 15:45:26

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Dennis Knaack
2065 Ryer Ave
Bronx, NY 10457
knaackdennis@yahoo.com
(201) 737-4728

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:21:10 PM

From: [Doreen Curtin \(doreencurtin@ymail.com\)](mailto:doreencurtin@ymail.com) [Sent You a Personal Message](#)

Mail received time: Sat, 9 Aug 2025 15:56:37

Sent: Sat, 09 Aug 2025 15:56:00

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Doreen Curtin
565 General Leroy Manor Rd
Morrisonville, NY 12962
doreencurtin@ymail.com
(518) 572-3957

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:21:18 PM

From: [Judy Friedman \(judyoll@yahoo.com\)](mailto:judyoll@yahoo.com) [Sent You a Personal Message](#)

Mail received time: Sat, 9 Aug 2025 16:07:42

Sent: Sat, 09 Aug 2025 16:06:54

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources:** The Micron project is slated to destroy hundreds of acres of wetlands that provide habitat for species and provide natural flood mitigation. The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds. Ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
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- **Affordable and Abundant Water and Energy:** The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of

infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Judy Friedman
209 Bayside Ave
Oceanside, NY 11572
judyoll@yahoo.com
(516) 766-5778

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:21:25 PM

From: [Sally Kramer \(sally.m.kramer@gmail.com\)](mailto:sally.m.kramer@gmail.com) [Sent You a Personal Message](#)

Mail received time: Sat, 9 Aug 2025 16:12:06

Sent: Sat, 09 Aug 2025 16:11:31

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Sally Kramer
17 Cornelia St Apt 1d
New York, NY 10014
sally.m.kramer@gmail.com
(347) 585-0076

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:08:44 PM

From: [Liz D. \(lizgospel@yahoo.com\)](mailto:lizgospel@yahoo.com) [Sent You a Personal Message](#)

Mail received time: Sat, 9 Aug 2025 16:24:53

Sent: Sat, 09 Aug 2025 16:24:22

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Liz D.
1855 Obrien Ave
Bronx, NY 10473
lizgospel@yahoo.com
(718) 328-7205

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:08:54 PM

From: [Clara Galvano \(eclair09@hotmail.com\)](mailto:eclair09@hotmail.com) [Sent You a Personal Message](#)

Mail received time: Sat, 9 Aug 2025 16:33:56

Sent: Sat, 09 Aug 2025 16:33:49

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Water.... healthy water ?? is really important. Please make this right. Bless you for doing the right thing.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Clara Galvano
80 Bennett Ave Apt 1J
New York, NY 10033
eclair09@hotmail.com
(212) 795-0517

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:09:01 PM

From: [Kate Lenthall \(tiredqueer@duck.com\)](mailto:tiredqueer@duck.com) [Sent You a Personal Message](#)

Mail received time: Sat, 9 Aug 2025 16:49:20

Sent: Sat, 09 Aug 2025 16:48:29

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Kate Lenthall
4 Lundy Road
Wawarsing, NY 12489
tiredqueer@duck.com
(845) 555-0184

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:09:09 PM

From: [Anthony Smith \(atsmith48@twc.com\)](mailto:atsmith48@twc.com) [Sent You a Personal Message](#)

Mail received time: Sat, 9 Aug 2025 17:30:34

Sent: Sat, 09 Aug 2025 17:30:25

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Anthony Smith
121 E Elm St
Oneida, NY 13421
atsmith48@twc.com
(315) 280-0130

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:09:16 PM

From: [John Kastner \(johnkastner49@gmail.com\)](mailto:johnkastner49@gmail.com) [Sent You a Personal Message](#)

Mail received time: Sat, 9 Aug 2025 17:58:04

Sent: Sat, 09 Aug 2025 17:57:16

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

The draft environmental impact statement submitted by the Onandaga IDA and the U.S. Department of Commerce regarding the proposed Micron industries facility in Syracuse N. Y. does not address the environmental impacts, environmental restoration or worker safety issues related to the proposed plant's construction and operation. It is shoddy and incomplete and in no way is it the basis for proceeding with the issuance of permits

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

John Kastner
230 Coronado Dr
Rochester, NY 14617
johnkastner49@gmail.com
(585) 461-4701

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:09:24 PM

From:

Mail received time: Sat, 9 Aug 2025 18:06:25

Sent: Sat, 09 Aug 2025 18:05:54

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Mary Jane Uttech
755 Bowling Green Rd
Cortland, NY 13045
beaverhollow@frontiernet.net
(607) 849-3452

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:09:32 PM

From: [Lalita Malik \(lalitamalik@aol.com\)](mailto:lalitamalik@aol.com) [Sent You a Personal Message](#)

Mail received time: Sat, 9 Aug 2025 18:06:25

Sent: Sat, 09 Aug 2025 18:05:53

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Lalita Malik
61 Patrick Dr
Lagrangeville, NY 12540
lalitalmalik@aol.com
(845) 724-5786

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:09:39 PM

From: [Lorraine Best \(larab@usa.com\)](mailto:larab@usa.com) [Sent You a Personal Message](#)

Mail received time: Sat, 9 Aug 2025 18:20:34

Sent: Sat, 09 Aug 2025 18:20:29

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Lorraine Best
536 E 82nd St Apt 2C
New York, NY 10028
larab@usa.com
(212) 861-6645

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:09:47 PM

From: [Renee Vezina \(rvlilone@aol.com\)](mailto:rvlilone@aol.com) Sent You a Personal Message

Mail received time: Sat, 9 Aug 2025 18:48:30

Sent: Sat, 09 Aug 2025 18:47:58

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

The DEIS will destroy what makes CNY great- clean air and water. As well as impacting the agribusiness, which benefits both CNY and the broader US. This project is causing me to rethinking of staying in CNY and a Clay resident because the impact of this project will remove all the benefits and reasons for staying.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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CHIPS Act.

- Affordable and Abundant Water and Energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Renee Vezina
4770 Stonedale Dr
Liverpool, NY 13090
rvlilone@aol.com
(239) 642-8593

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:09:54 PM

From: [Drew Panko \(dpanko@pipeline.com\)](mailto:dpanko@pipeline.com) [Sent You a Personal Message](#)

Mail received time: Sat, 9 Aug 2025 19:37:45

Sent: Sat, 09 Aug 2025 19:37:11

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

While we need the tech and the jobs, we need to go forward with the best information on hand for protecting our environment, more fragile now with climate change. Please do all that you can to protect the environment of those who live nearby.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Drew Panko
112 Chelsea Road
White Plains, NY 10530
dpanko@pipeline.com
(914) 693-2081

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:10:02 PM

From: [j.s \(tatasage@gmail.com\)](mailto:j.s(tatasage@gmail.com)) [Sent You a Personal Message](#)

Mail received time: Sat, 9 Aug 2025 20:04:33

Sent: Sat, 09 Aug 2025 20:04:27

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

j s
1184 Clearview Rd
King Ferry, NY 13081
tatasage@gmail.com
(315) 364-5931

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:10:10 PM

From: [Chris Jones \(coolvibenyc@gmail.com\)](mailto:coolvibenyc@gmail.com) [Sent You a Personal Message](#)

Mail received time: Sat, 9 Aug 2025 21:03:03

Sent: Sat, 09 Aug 2025 21:02:31

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

While many of us CNY citizens are excited about Micron - we are also very worried about all pollution it will create and how it will be responsibly disposed of. Water and air pollution in particular are big worries. While welcome the economic pluses - we also dread the toxic side effects! Please in the name of all that is good - do not let them off the hook in dealing with these long lasting issues. We the People do not want cancer clusters just to create some decent paying jobs.

Thank You,

Christopher in Syracuse, NY

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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Thank you for your consideration of my comments.

Sincerely,

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Chris Jones
670 Westcott Street
Syracuse, NY 10009
coolvibenyc@gmail.com
(347) 567-4567

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Archived: Monday, October 13, 2025 6:10:17 PM

From: [Summer Downing \(summers808@gmail.com\)](mailto:summers808@gmail.com) Sent You a Personal Message

Mail received time: Sat, 9 Aug 2025 21:20:06

Sent: Sat, 09 Aug 2025 21:19:33

To: chipsnepa

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Summer Downing
88 Oak St Apt 4
Hudson Falls, NY 12839
summers808@gmail.com
(518) 812-9262

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Archived: Monday, October 13, 2025 6:10:24 PM

From: [Daniel C \(05-hugs.latch@icloud.com\) Sent You a Personal Message](mailto:Daniel C (05-hugs.latch@icloud.com) Sent You a Personal Message)

Mail received time: Sat, 9 Aug 2025 21:35:54

Sent: Sat, 09 Aug 2025 21:35:49

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Daniel C
824 Berkshire Rd
Wingdale, NY 12594
05-hugs.latch@icloud.com
(914) 393-3279

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Archived: Monday, October 13, 2025 6:10:32 PM

From: [Barbara Reukauf \(reubarb53@verizon.net\)](mailto:reubarb53@verizon.net) [Sent You a Personal Message](#)

Mail received time: Sat, 9 Aug 2025 22:19:21

Sent: Sat, 09 Aug 2025 22:19:16

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

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- **Greenhouse Gases:** The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar, and without relying on renewable energy credits or using renewable energy that is already on the grid, to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.
- **Affordable and Abundant Water and Energy:** The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of

infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Barbara Reukauf
277 Enchanted Frst N
Lancaster, NY 14086
reubarb53@verizon.net
(716) 656-9490

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:48:29 PM

From: [Rita Jaskowitz \(ritajaskowitz@yahoo.com\)](mailto:ritajaskowitz@yahoo.com) [Sent You a Personal Message](#)

Mail received time: Sat, 9 Aug 2025 22:35:28

Sent: Sat, 09 Aug 2025 22:35:23

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources:** The Micron project is slated to destroy hundreds of acres of wetlands that provide habitat for species and provide natural flood mitigation. The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds. Ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
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- **Affordable and Abundant Water and Energy:** The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of

infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Rita Jaskowitz
121 7th Ave
Brooklyn, NY 11215
ritajaskowitz@yahoo.com
(718) 783-0351

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:48:36 PM

From: [Araby Parsons \(araby06@gmail.com\)](mailto:araby06@gmail.com) [Sent You a Personal Message](#)

Mail received time: Sat, 9 Aug 2025 22:54:41

Sent: Sat, 09 Aug 2025 22:54:07

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

As a New York State resident I am concerned about the environmental impacts of the new microchip facility being constructed by Micron Technology in Clay. I believe that the draft DEIS must provide additional analysis to protect water quality, ground water, and surface water. It must also provide more information on what kinds of chemicals will be used in the microchip production, and how these chemicals will be monitored and enforced in order to minimize contamination of air, water and soil, and also to protect workers and the public's health and safety. And DEIS does not ensure that Micron and the public's massive energy and water use will not make energy and clean water less affordable and pass the cost of infrastructure upgrades and higher energy demands resulting from the project on to rate payers. Thank you for your attention to my concerns. Sincerely, Ms. Araby Parsons

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

I urge consideration and response to the following issues and concerns:

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- Affordable and Abundant Water and Energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Araby Parsons
2540 31st Ave Apt 5H
Astoria, NY 11106
arabie06@gmail.com
(718) 274-3762

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:48:44 PM

From: [Teresa Beutel \(teresabeutel@hotmail.com\)](mailto:teresabeutel@hotmail.com) [Sent You a Personal Message](#)

Mail received time: Sat, 9 Aug 2025 23:53:05

Sent: Sat, 09 Aug 2025 23:53:01

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

I urge consideration and response to the following issues and concerns:

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- **Affordable and Abundant Water and Energy:** The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of

infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Teresa Beutel
234 S Grant Ave
Congers, NY 10920
teresabeutel@hotmail.com
(914) 555-5555

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:48:52 PM

From: [Nancy Ward \(nancyward520@gmail.com\)](mailto:nancyward520@gmail.com) [Sent You a Personal Message](#)

Mail received time: Sun, 10 Aug 2025 00:10:57

Sent: Sun, 10 Aug 2025 00:10:24

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

I urge consideration and response to the following issues and concerns:

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- **Affordable and Abundant Water and Energy:** The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of

infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Nancy Ward
520 E 81st St Apt 14d
New York, NY 10028
nancyward520@gmail.com
(917) 574-0467

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:48:59 PM

From:

Mail received time: Sun, 10 Aug 2025 00:17:19

Sent: Sun, 10 Aug 2025 00:16:44

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources:** The Micron project is slated to destroy hundreds of acres of wetlands that provide habitat for species and provide natural flood mitigation. The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds. Ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
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- **Affordable and Abundant Water and Energy:** The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of

infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Bartholomew Bartholomew

3 E Atlantic Ave

Oceanside, NY 11572

carbar994@gmail.com

(516) 547-3963

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:49:07 PM

From:

Mail received time: Sun, 10 Aug 2025 00:48:51

Sent: Sun, 10 Aug 2025 00:48:14

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Please take environmental impacts into consideration.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

I urge consideration and response to the following issues and concerns:

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- Affordable and Abundant Water and Energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Christian Smith
2096 bigby hollow st.
columbus, OH 43228
csmith.smith352@gmail.com
(614) 270-0794

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:49:14 PM

From: [Michael Hollywood \(mrhollyw@hotmail.com\)](mailto:mrhollyw@hotmail.com) [Sent You a Personal Message](#)

Mail received time: Sun, 10 Aug 2025 01:21:35

Sent: Sun, 10 Aug 2025 01:20:18

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Michael Hollywood
1302 Westmoreland Ave
Syracuse, NY 13210
mrhollyw@hotmail.com
(315) 471-0056

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:49:22 PM

From: [Jim Eigo \(jimeigo@aol.com\)](mailto:jimeigo@aol.com) [Sent You a Personal Message](#)

Mail received time: Sun, 10 Aug 2025 01:52:31

Sent: Sun, 10 Aug 2025 01:51:57

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Jim Eigo
182 Avenue A Apt 1B
New York, NY 10009
jimeigo@aol.com
(212) 533-2769

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Archived: Monday, October 13, 2025 6:49:29 PM

From: [Susan McLaughlin \(suzzymnyc@gmail.com\)](mailto:suzzymnyc@gmail.com) [Sent You a Personal Message](#)

Mail received time: Sun, 10 Aug 2025 01:56:04

Sent: Sun, 10 Aug 2025 01:55:57

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

I am extremely concerned about the impact of this project on our environment here in NY State. More needs to be done to protect the habitat in the area as this project develops. Please make sure Micron does everything possible to limit their adverse impact on the environment.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources:** The Micron project is slated to destroy hundreds of acres of wetlands that provide habitat for species and provide natural flood mitigation. The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds. Ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
- **Protection of Air, Water, and Workers:** Microchip production requires numerous toxic chemicals, including PFAS "forever chemicals," but the DEIS does not provide sufficient detail on the types of chemicals that will be used or how continuous environmental monitoring and compliance will be enforced. The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the use of thousands of tons of hazardous chemicals in semiconductor production every year. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
- **Greenhouse Gases:** The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar, and without relying on renewable energy credits or using renewable energy that is already on the grid, to meet New York State's climate change objectives and the requirements of the New York Green

CHIPS Act.

- Affordable and Abundant Water and Energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Susan McLaughlin
175 W 93rd St Apt 3A
New York, NY 10025
suzzymnyc@gmail.com
(212) 666-1407

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:49:37 PM

From: [Oliver Kienzi \(oliver_kienzi@hotmail.com\)](mailto:oliver_kienzi@hotmail.com) [Sent You a Personal Message](#)

Mail received time: Sun, 10 Aug 2025 01:57:51

Sent: Sun, 10 Aug 2025 01:57:11

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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- **Affordable and Abundant Water and Energy:** The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of

infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Oliver Kienzi
326 W 55th St Apt 4C
New York, NY 10019
oliver_kienzi@hotmail.com
(917) 724-4235

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:49:44 PM

From: [Suzanne Schaem \(suzanne@yaho.com\)](mailto:suzanne@yaho.com) Sent You a Personal Message

Mail received time: Sun, 10 Aug 2025 04:25:36

Sent: Sun, 10 Aug 2025 04:25:31

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Suzanne Schaem
PO Box 8029
New York, NY 10150
suzannemls@yahoo.com
(212) 999-9999

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:49:51 PM

From: [Madison Suli \(foxyroxy443@gmail.com\)](mailto:foxyroxy443@gmail.com) [Sent You a Personal Message](#)

Mail received time: Sun, 10 Aug 2025 05:06:41

Sent: Sun, 10 Aug 2025 05:05:37

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Madison Suli
531 W 235th St
Bronx, NY 10463
foxyroxy443@gmail.com
(347) 440-4758

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:49:59 PM

From:

Mail received time: Sun, 10 Aug 2025 11:34:31

Sent: Sun, 10 Aug 2025 11:34:24

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Please protect the quality of life for those of us living in beautiful central New York by addressing the environmental impacts of Micron's proposed facility. Please hold strong for us against a corporation that seems to want to shift the costs of its environmental impacts to the people.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Theresa Mcfarland-Porter
333 Council Rock Ave
Rochester, NY 14610
tess@rochester.rr.com
(585) 242-9585

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:50:07 PM

From: [Lori Saslow \(lorisas@msn.com\)](mailto:lorisas@msn.com) [Sent You a Personal Message](#)

Mail received time: Sun, 10 Aug 2025 11:36:55

Sent: Sun, 10 Aug 2025 11:36:49

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

I urge you to stop Micron's project from progressing until we the people have more time to review the very lengthy report. In particular, I want answers about why wetlands will be destroyed when these areas need protection so that humans and all species can thrive and survive. And, adding chemicals including PFAS to the environment is unacceptable and we need answers about how Micron will minimize exposure to the public.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Lori Saslow
5016 Concord Ave
Great Neck, NY 11020
lorisas@msn.com
(516) 782-7834

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:50:14 PM

From:

Mail received time: Sun, 10 Aug 2025 11:43:40

Sent: Sun, 10 Aug 2025 11:43:03

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

VICTORIA SPINANGER
416 Sedgwick Drive, Syracuse, NY, USA
syracuse, NY 13203
vkspinanger@hotmail.com
(315) 560-2275

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:50:21 PM

From: [Boyce Sherwin \(bsherwin02@yahoo.com\)](mailto:bsherwin02@yahoo.com) Sent You a Personal Message

Mail received time: Sun, 10 Aug 2025 13:11:27

Sent: Sun, 10 Aug 2025 13:10:49

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Maintenance of habitat services and elimination of greenhouse gasses are most important to me.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Boyce Sherwin
21 Monroe St
Malone, NY 12953
bsherwin02@yahoo.com
(518) 521-3226

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Archived: Monday, October 13, 2025 6:50:29 PM

From: [Brady Fergusson \(bradyf585@gmail.com\)](mailto:bradyf585@gmail.com) [Sent You a Personal Message](#)

Mail received time: Sun, 10 Aug 2025 13:34:34

Sent: Sun, 10 Aug 2025 13:34:28

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Brady Fergusson
28 Nelson St
Rochester, NY 14620
bradyf585@gmail.com
(585) 469-5480

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:50:37 PM

From: [Cheryl Voelker \(voelker1234@icloud.com\)](mailto:voelker1234@icloud.com) Sent You a Personal Message

Mail received time: Sun, 10 Aug 2025 14:25:18

Sent: Sun, 10 Aug 2025 14:25:14

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Cheryl Voelker
41 Kibler Dr
Depew, NY 14043
voelker1234@icloud.com
(716) 239-1461

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:50:44 PM

From: [Tom Helling \(tom.helling@gmail.com\)](mailto:tom.helling@gmail.com) [Sent You a Personal Message](#)

Mail received time: Sun, 10 Aug 2025 14:25:47

Sent: Sun, 10 Aug 2025 14:25:39

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Tom Helling
360 Route 217
Hudson, NY 12534
tom.helling@gmail.com
(917) 593-0946

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:50:52 PM

From: [Mark Beyer \(mbeyer55@gmail.com\)](mailto:mbeyer55@gmail.com) [Sent You a Personal Message](#)

Mail received time: Sun, 10 Aug 2025 14:39:48

Sent: Sun, 10 Aug 2025 14:39:43

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Mark Beyer
1 Carteret St
Staten Island, NY 10307
mbeyer55@gmail.com
(718) 984-5793

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:50:59 PM

From: [Maria Gomez \(maria270@msn.com\)](mailto:maria270@msn.com) [Sent You a Personal Message](#)

Mail received time: Sun, 10 Aug 2025 15:37:34

Sent: Sun, 10 Aug 2025 15:36:45

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Maria Gomez
270 Hewes St
Brooklyn, NY 11211
maria270@msn.com
(347) 668-4660

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:51:07 PM

From:

Mail received time: Sun, 10 Aug 2025 16:40:48

Sent: Sun, 10 Aug 2025 16:40:12

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

First of all, for the public trying to write comments on a 20,000 page document in a 45 day period is not attainable. This comment period must be extended for at least 90 more days.

Once wetlands and habitata are destroyed - they can never be brought back.

Without a complete list of the toxic chemicals - including PFSandapos;s that will be emitted into the air, water and soil, it is not possible to even write comments. Once agin, once these toxins are released - they can never be undone. Mitigation is not the answer. Not allowing this monstrosity to move forward is the answer.

regarding Green House Gases - one can not pollute and create dirty energy and then receive andquot;creditandquot; for planting trees or using solar in some ridiculously small way.

This project pits the peoples right to clean water and affordable , renewable energy against corporate greed - for profit with benefiting the people. Water is life and it does not belong to a corporation.

A totally destructive project. Donandapos;t do it.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Jacquelyn Drechsler
116 Sierra Vista Ln
Valley Cottage, NY 10989
jacquiflute456@gmail.com
(845) 270-5837

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:51:14 PM

From: [Nancy Cockett \(ncockett@gmail.com\)](mailto:ncockett@gmail.com) [Sent You a Personal Message](#)

Mail received time: Sun, 10 Aug 2025 17:32:15

Sent: Sun, 10 Aug 2025 17:32:08

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Our environment is already threatened. Please make sure to address all of the concerns brought up here especially in regards to destroying the wetlands.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Nancy Cockett
676 Cross Road
Phelps, NY 14532
ncockett@gmail.com
(585) 755-4692

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:51:22 PM

From:

Mail received time: Sun, 10 Aug 2025 17:51:11

Sent: Sun, 10 Aug 2025 17:51:05

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Patricia Vineski
76 E Hill Rd
South Colton, NY 13687
vineskipatricia@gmail.com
(315) 244-3674

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:51:32 PM

From: [Mark Johnson \(ninmar@mindspring.com\)](mailto:ninmar@mindspring.com) [Sent You a Personal Message](#)

Mail received time: Sun, 10 Aug 2025 18:36:26

Sent: Sun, 10 Aug 2025 18:36:21

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Hey...any interest in saving the only planet any.of us have anymore...? Oh yeah...andquot;Invaders From Earthandquot;

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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- **Protection of Air, Water, and Workers:** Microchip production requires numerous toxic chemicals, including PFAS "forever chemicals," but the DEIS does not provide sufficient detail on the types of chemicals that will be used or how continuous environmental monitoring and compliance will be enforced. The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the use of thousands of tons of hazardous chemicals in semiconductor production every year. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.

- **Greenhouse Gases:** The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar, and without relying on renewable energy credits or using renewable energy that is already on the grid, to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

- Affordable and Abundant Water and Energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Mark Johnson
141 E 3rd St Apt 8E
New York, NY 10009
ninmar@mindspring.com
(917) 596-8299

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:51:42 PM

From: [Nancy Prowell \(neprowell@gmail.com\)](mailto:neprowell@gmail.com) [Sent You a Personal Message](#)

Mail received time: Sun, 10 Aug 2025 18:43:32

Sent: Sun, 10 Aug 2025 18:43:27

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

I urge consideration and response to the following issues and concerns:

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- **Affordable and Abundant Water and Energy:** The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of

infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Nancy Prowell
4545 County Road 33
Honeoye, NY 14471
neprowell@gmail.com
(585) 229-5715

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:51:53 PM

From: [Carol Hinkelman \(carolhroc@gmail.com\)](mailto:carolhroc@gmail.com) [Sent You a Personal Message](#)

Mail received time: Sun, 10 Aug 2025 19:53:10

Sent: Sun, 10 Aug 2025 19:52:37

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

I am concerned that the huge Micron project will have so many negative environmental impacts. The issues listed below need very serious study and mitigation.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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- Affordable and Abundant Water and Energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Carol Hinkelman
348 Ripplewood Dr
Rochester, NY 14616
carolhroc@gmail.com
(585) 663-2981

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:52:03 PM

From: [John Keevert \(jkeev101@gmail.com\)](mailto:jkeev101@gmail.com) [Sent You a Personal Message](#)

Mail received time: Sun, 10 Aug 2025 20:28:07

Sent: Sun, 10 Aug 2025 20:27:24

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

I welcome a new semiconductor facility on US soil, but ask that additional effort be placed on ensuring that the plant will use a new source of renewable energy, and not hijack an existing supply, driving up prices and delaying the CLCPA schedule for removal of fossil fuel based energy sources.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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CHIPS Act.

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

John Keevert
101 Coniston Dr
Rochester, NY 14610
jkeev101@gmail.com
(585) 472-4466

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:52:11 PM

From: [Katharine Skolnick \(krs1123@gmail.com\)](mailto:krs1123@gmail.com) [Sent You a Personal Message](#)

Mail received time: Sun, 10 Aug 2025 23:25:25

Sent: Sun, 10 Aug 2025 23:24:23

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Katharine Skolnick
40 W 116th St PH A1206
New York, NY 10026
krs1123@gmail.com
(650) 207-5516

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:52:19 PM

From: [Barbara Federman \(bfliny@aol.com\)](mailto:bfliny@aol.com) [Sent You a Personal Message](#)

Mail received time: Mon, 11 Aug 2025 00:04:07

Sent: Mon, 11 Aug 2025 00:04:02

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Possibly destroying water sources. Taking away areas where we know animals live. Potential danger to people living near the area. All these must first be addressed before moving forward.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Barbara Federman
666 Interlaken Ln
North Babylon, NY 11703
bfliny@aol.com
(631) 363-2655

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:46:27 PM

From: [John Lord \(john.jlint@gmail.com\)](mailto:john.jlint@gmail.com) [Sent You a Personal Message](#)

Mail received time: Mon, 11 Aug 2025 01:13:17

Sent: Mon, 11 Aug 2025 01:13:14

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

John Lord
861 Drewville Rd
Brewster, NY 10509
john.jlntl@gmail.com
(845) 279-3587

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:46:36 PM

From: [Aura Lippincott \(alippinc@gmail.com\)](mailto:alippinc@gmail.com) [Sent You a Personal Message](#)

Mail received time: Mon, 11 Aug 2025 01:47:14

Sent: Mon, 11 Aug 2025 01:47:07

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

This project must consider ALL impacts and address destruction of habitat - with concrete mitigation and restoration plans - if it proceeds at all. Don't relegate nature to destruction when there are alternatives. Nature and humans can't afford it particularly for short term and gain;

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Aura Lippincott
PO Box 164
Wassaic, NY 12592
alippinc@gmail.com
(818) 606-9376

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 7:05:09 PM

From: [Any Odonnell \(fallenangel05@msn.com\)](mailto:fallenangel05@msn.com) [Sent You a Personal Message](#)

Mail received time: Mon, 11 Aug 2025 02:52:59

Sent: Mon, 11 Aug 2025 02:52:13

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

It's important to maintain the ecology of the planet.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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- Affordable and Abundant Water and Energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Any Odonnell
192 Erie Blvd Apt 605
Schenectady, NY 12305
fallenangel05@msn.com
(516) 555-2345

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, October 16, 2025 2:24:27 PM

From: [Donavym Sandusky \(donavym@gmail.com\)](mailto:donavym@gmail.com) [Sent You a Personal Message](#)

Mail received time: Mon, 11 Aug 2025 04:47:18

Sent: Mon, 11 Aug 2025 04:46:44

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

I urge consideration and response to the following issues and concerns:

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Donavynn Sandusky
136 Crystal Dr
North Syracuse, NY 13212
donavynn@gmail.com
(704) 402-9914

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, October 16, 2025 2:26:12 PM

From: [M. E. WALKOWZ \(walk546@hotmail.com\)](mailto:walk546@hotmail.com) [Sent You a Personal Message](#)

Mail received time: Mon, 11 Aug 2025 10:26:42

Sent: Mon, 11 Aug 2025 10:26:38

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Work now to ensure the environment is properly protected from harmful chemicals. This will save money, time and energy for the future of our children and the planet. Cleaning up a future problem will be costly.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

M. E. WALKOWZ
738 Royal Sunset Dr
Webster, NY 14580
walk546@hotmail.com
(585) 224-8699

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, October 16, 2025 2:02:45 PM

From: [Katelyn Batson \(kbatson508@gmail.com\)](mailto:kbatson508@gmail.com) Sent You a Personal Message

Mail received time: Mon, 11 Aug 2025 14:08:32

Sent: Mon, 11 Aug 2025 14:04:15

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Katelyn Batson
28 Bedell Rd
Katonah, NY 10536
kbatson508@gmail.com
(914) 962-2394

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:47:14 PM

From: [Hal Smith \(hals205b@aol.com\)](mailto:hals205b@aol.com) [Sent You a Personal Message](#)

Mail received time: Mon, 11 Aug 2025 15:57:32

Sent: Mon, 11 Aug 2025 15:57:29

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Hal Smith
205B Garrett Rd
Windsor, NY 13865
hals205b@aol.com
(607) 655-2490

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:47:21 PM

From: [Bruce Damalt \(gunpowder555@yahoo.com\)](mailto:gunpowder555@yahoo.com) Sent You a Personal Message

Mail received time: Mon, 11 Aug 2025 16:52:18

Sent: Mon, 11 Aug 2025 16:51:29

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

If this project does go thru what steps will be taken to ensure an environmental damage / remediation will be full paid for by Micron and not the tax payer !

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Bruce Damalt
19 Henry Dr
Auburn, NY 13021
gunpowder555@yahoo.com
(315) 252-4057

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:47:29 PM

From:

Mail received time: Mon, 11 Aug 2025 18:26:23

Sent: Mon, 11 Aug 2025 18:25:07

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

I do not want wetlands in New York destroyed. This plant could do great damage.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Maryanna Moskal
85 Millbrook Dr
Buffalo, NY 14221
maryannamoskal@hotmail.com
(716) 892-9166

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:47:36 PM

From: [Mary Finneran \(msfinn123@yahoo.com\)](mailto:msfinn123@yahoo.com) Sent You a Personal Message

Mail received time: Mon, 11 Aug 2025 18:54:25

Sent: Mon, 11 Aug 2025 18:54:19

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

My name is Mary Finneran and I live in Greene County NY. I did live in the Syracuse area for 15 years and have a fair knowledge of the environs. I am very concerned about the extreme energy use and how that energy might be taken from the people and its needs, including renewable energy use. I am also concerned about the energy source if it is natural gas upstream and downstream impacts must be considered especially the methane emissions which are the worst GHG emissions. I would be equally concerned if nuclear were to be considered the energy source due to the radioactivity, affordability lack, and the serious waste issues from the start to the end of the process, from uranium mining tailings to the spent fuel rods. I am not aware whether the US fish and wildlife eagle takings have been considered. They are now common near Onondaga lake and have likely spread into Clay. Remember the prime DEC mission is to protect the environment.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Mary Finneran
104 Jerome Ave
Cairo, NY 12413
msfinn123@yahoo.com
(518) 965-2935

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:47:44 PM

From: Joan Mullee (bjpmnstd@gmail.com) Sent You a Personal Message

Mail received time: Mon, 11 Aug 2025 20:49:10

Sent: Mon, 11 Aug 2025 20:49:04

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

The Micron project is not inherently a bad thing, but the environmental impacts must be understood, presented clearly to the public and mitigated before and as an ongoing requirement to the facility's operation. There's a lot of money to be made here; environmental responsibility must be considered and factored into the operating budget.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Joan Mullee
91 Ganung Dr
Ossining, NY 10562
bpmnstd@gmail.com
(914) 941-5291

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:47:51 PM

From: [Laura Carnamela \(lcanname@hotmail.com\)](mailto:lcanname@hotmail.com) [Sent You a Personal Message](#)

Mail received time: Mon, 11 Aug 2025 22:40:22

Sent: Mon, 11 Aug 2025 22:39:48

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Eleanor Roosevelt stated, andquot;It is today that we must create the world of the future.andquot; What kind of world will be created for future generations if we don't consider the negative impacts of our actions on the environment today?

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

I urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources:** The Micron project is slated to destroy hundreds of acres of wetlands that provide habitat for species and provide natural flood mitigation. The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds. Ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
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- **Greenhouse Gases:** The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar, and without relying on renewable energy credits or using renewable energy that

is already on the grid, to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

- Affordable and Abundant Water and Energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Laura Carnamela
4006 Chatham St
Valatie, NY 12184
lcanname@hotmail.com
(518) 929-9285

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:47:59 PM

From: [Leanne Block \(leanne.block@gmail.com\)](mailto:leanne.block@gmail.com) Sent You a Personal Message

Mail received time: Mon, 11 Aug 2025 22:56:04

Sent: Mon, 11 Aug 2025 22:55:59

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

As a big fan of New York's natural beauty, I am urging you to think about the environmental impacts of the Micron Project. Please help protect the nature that makes this state great!

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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- Affordable and Abundant Water and Energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Leanne Block
925 W End Ave Apt 2g
New York, NY 10025
leanne.block@gmail.com
(908) 418-0567

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:48:07 PM

From: [Kathy Burch \(kathy.burch58@gmail.com\)](mailto:kathy.burch58@gmail.com) [Sent You a Personal Message](#)

Mail received time: Mon, 11 Aug 2025 23:50:00

Sent: Mon, 11 Aug 2025 23:49:56

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Kathy Burch
311 Maplecrest Ave
Lakewood, NY 14750
kathy.burch58@gmail.com
(716) 763-9575

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:48:14 PM

From:

Mail received time: Tue, 12 Aug 2025 00:22:38

Sent: Tue, 12 Aug 2025 00:22:35

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Please allow adequate time for the careful, full consideration of the proposed details for this project and its future impact.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Michelle Santantonio
41 New Jersey Ave
Bellport, NY 11713
michellesantantonio@yahoo.com
(631) 286-1803

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Monday, October 13, 2025 6:48:22 PM

From: [Diane Ciurczak \(dianeciurczak@gmail.com\)](mailto:dianeciurczak@gmail.com) [Sent You a Personal Message](#)

Mail received time: Tue, 12 Aug 2025 02:28:09

Sent: Tue, 12 Aug 2025 02:28:03

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Diane Ciurczak
151 Lancaster Ave
Buffalo, NY 14222
dianeciurczak@gmail.com
(716) 435-8043

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Tuesday, October 14, 2025 7:56:03 AM

From: [Barry Zuckerman \(b_zuckerman@yahoo.com\)](mailto:b_zuckerman@yahoo.com) Sent You a Personal Message

Mail received time: Tue, 12 Aug 2025 14:51:38

Sent: Tue, 12 Aug 2025 14:50:02

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Barry Zuckerman
1 Old Anvil Ln
Middletown, NY 10940
b_zuckerman@yahoo.com
(914) 443-1485

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Archived: Tuesday, October 14, 2025 7:59:46 AM

From: [Martha Lynch \(mailmarlynch@gmail.com\)](mailto:mailmarlynch@gmail.com) [Sent You a Personal Message](#)

Mail received time: Tue, 12 Aug 2025 16:16:20

Sent: Tue, 12 Aug 2025 16:16:17

To: [chipsnepa](#)

Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Importance: Normal

Sensitivity: None

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

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infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Martha Lynch
276 Gansevoort Blvd
Staten Island, NY 10314
mailmarlynch@gmail.com
(718) 761-1732

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

From: Susan Farmer (flyby145@outlook.com) Sent You a Personal Message <flyby145@forgrassroots.com>
Sent: Friday, August 8, 2025 2:02 PM
To: Members of the CPO and OCIDA
Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Dear Members of the CPO and OCIDA,

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Susan Farmer
145 Henry St
Valley Stream, NY 11580
flyby145@outlook.com
(516) 823-0577

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

From: Cathy Marczyk (roncat1978@outlook.com) Sent You a Personal Message <roncat1978@advocatesmessage.com>
Sent: Friday, August 8, 2025 5:24 PM
To: Members of the CPO and OCIDA
Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

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I urge consideration and response to the following issues and concerns:

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- Protection of Air, Water, and Workers: Microchip production requires numerous toxic chemicals, including PFAS "forever chemicals," but the DEIS does not provide sufficient detail on the types of chemicals that will be used or how continuous environmental monitoring and compliance will be enforced. The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the use of thousands of tons of hazardous chemicals in semiconductor production every year. Micron must adopt detailed plans to minimize negative impacts to

workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.

- Greenhouse Gases: The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar, and without relying on renewable energy credits or using renewable energy that is already on the grid, to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

- Affordable and Abundant Water and Energy: The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Cathy Marczyk
15 Tiros Ave
Highland Mills, NY 10930
roncat1978@outlook.com
(845) 827-5436

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

From: Steven Goldstein (mountainwalker60@gmail.com) Sent You a Personal Message
<mountainwalker60@advocatefor.me>
Sent: Tuesday, August 12, 2025 7:14 PM
To: Members of the CPO and OCIDA
Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Dear Members of the CPO and OCIDA,

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron’s proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron’s Central New York Project.

I urge consideration and response to the following issues and concerns:

- Water and Ecological Resources: The Micron project is slated to destroy hundreds of acres of wetlands that provide habitat for species and provide natural flood mitigation. The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds. Ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.

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workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Steven Goldstein
184 W Nicholai St
Hicksville, NY 11801
mountainwalker60@gmail.com
(516) 606-3528

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

From: Alice Meilman (alicemeilman@gmail.com) Sent You a Personal Message
<alicemeilman@sendgrassroots.com>
Sent: Tuesday, August 12, 2025 1:52 PM
To: Members of the CPO and OCIDA
Subject: [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001; Micron Project in Clay, NY

Dear Members of the CPO and OCIDA,

We must assess environmental impact in new manufacturing projects. For the health of all of us. Let's be part of the solution toward a clean environment.

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. The 20,000-page DEIS report leaves many questions unanswered about the potential impacts and mitigation measures associated with Micron's Central New York Project.

I urge consideration and response to the following issues and concerns:

- Water and Ecological Resources: The Micron project is slated to destroy hundreds of acres of wetlands that provide habitat for species and provide natural flood mitigation. The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds. Ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.

- Protection of Air, Water, and Workers: Microchip production requires numerous toxic chemicals, including PFAS "forever chemicals," but the DEIS does not provide sufficient detail on the types of chemicals that will be used or how continuous environmental monitoring and compliance will be

enforced. The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the use of thousands of tons of hazardous chemicals in semiconductor production every year. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.

- Greenhouse Gases: The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar, and without relying on renewable energy credits or using renewable energy that is already on the grid, to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

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Thank you for your consideration of my comments.

Sincerely,

Sincerely,

Alice Meilman
131 Cambridge Pl
Ithaca, NY 14850
alicemeilman@gmail.com
(607) 257-5026

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

From: chipsnepa <chipsnepa@chips.gov>
Sent: Monday, June 30, 2025 1:16 PM
To:
Subject: FW: Extend the comment period

From: Qiana Kiane <qianaki@gmail.com>
Sent: Monday, June 30, 2025 11:12 AM
To: chipsnepa <chipsnepa@chips.gov>
Subject: Extend the comment period

To whom it may concern:

Out of respect for the future generations of the CNY region and for the safety and peace of its current residents and children, please do the right thing and extend the comment period to at least 120 days. Make this a collaborative process that includes the voices of those most impacted by the proposed Micron development. It won't be successful unless the right and just thing is done. If the past has taught us anything, haste makes waste and destroys our most vital natural gifts. Onondaga Lake is proof of that. Our community deserves better and Micron and our elected officials can do better!

Respectfully,

--

Ms. Qiana Williams
(pronouns: She/Her/Hers)

From: chipsnepa <chipsnepa@chips.gov>
Sent: Thursday, June 26, 2025 9:54 AM
To:
Cc:
Subject: FW: Micron EIS - Clay NY

This message needs your attention

- This is their first email to your company.

Mark as Safe

Report Malicious or Mark Safe (click once)

Powered by Mimecast

From: Paul Doody <pauldoody1978@gmail.com>
Sent: Wednesday, June 25, 2025 5:49 PM
To: chipsnepa <chipsnepa@chips.gov>
Subject: Micron EIS - Clay NY

Thank you for the opportunity to review the EIS for the proposed semiconductor fabrication facility being built by Micron in Clay NY. I plan on submitting comments and have accessed all the available documents. I am a retired chemical engineer, spending the early part of my career working at a semiconductor facility as a facilities chemical/environmental engineer so I have a keen interest in reviewing the EIS. In my personal planning to review the EIS, I observed the following:

1. The main body of the EIS is 719 pages
2. The appendices are in numerous files (18 total Appendices (A-R) in 19 files) totaling 19,251 pages. Note the Transportation appendix is 12,369 pages alone which may be of most interest to general public.
3. The total number of pages to review is 19,970 pages

I believe the proposed review period of 45 days is not sufficient for the public to be able to review such a consequential document. If I (or anyone else in the public) had nothing else to do we need to read 444 pages/day to get through the entire document in 45 days, which leaves no time to write up comments. We are now in summer season and most people, including myself, have many other things going on so in my opinion 45 days is woefully insufficient to be able to adequately review the report and develop meaningful comments. The public deserves more time and it would be helpful if the EIS team could hold several public sessions to present their findings (consider covering different specific topics each session) and answer questions. I realize you all have a desire to start construction but this important investment in our community deserves ample time for the public to fully understand what the impacts are expected to be, and it's in Micron's and the public agencies' interest to have the public fully prepared for what's to come, so I respectfully request we be provided 120 days to review the documents and submit comments. This would take the pressure off having to sacrifice vacation or family time over the summer and allow some review time in the fall. Thank you for the opportunity to review and comment on the documents as well as your consideration to extend the public review period.

Paul Doody
pauldoody1978@gmail.com
315-409-5643

From: chipsnepa <chipsnepa@chips.gov>
Sent: Monday, June 30, 2025 1:13 PM
To:
Subject: FW: Public comment MICRON

From: Kelly Forsyth <forsythkm0726@gmail.com>
Sent: Thursday, June 26, 2025 10:35 PM
To: chipsnepa <chipsnepa@chips.gov>
Subject: Public comment MICRON

Hello,

This email is to serve as public comment on the Micron project and the newly released DEIS document.

It is my understanding that on June 25, 2025, the Onondaga County Industrial Development Agency (OCIDA)- a major sponsor of Micron Technology's microchip manufacturing project in New York- released [the Draft Environmental Impact Statement \(DEIS\)](#) for the project.

The **public comment period** for this massive factory project, which will use more water than the city of Syracuse and as much energy as the states of Vermont and New Hampshire combined, is only 45 days long- open **until Monday, August 11, 2025-** with only one day of public hearings announced on July 24, 2025.

This is not nearly enough time or opportunity for members of the public to carefully review and provide meaningful input on the lengthy DEIS (it has almost 20,000 pages of appendices!) for Micron's \$100 billion plan- the largest industrial development project in NY State history and the largest microchip fabrication facility in US history. Micron is receiving \$5.5 billion in NY Green CHIPS Act subsidies and upwards of \$20 billion in total public subsidies.

Therefore, as a community member and taxpayer, I am formally requesting that at least 120 days be provided for the public to review the massive Micron DEIS document and allow time for us all voice our concerns about the impact on our local environment.

Thank you for your attention to this very important matter.

Kelly Forsyth

From: chipsnepa <chipsnepa@chips.gov>
Sent: Monday, June 30, 2025 1:11 PM
To:
Subject: FW: Micron DEIS document

From: Kim Graziano <ksgraziano@gmail.com>
Sent: Thursday, June 26, 2025 1:52 PM
To: chipsnepa <chipsnepa@chips.gov>
Subject: Micron DEIS document

I am requesting at **LEAST 120 days for our communities to review** the Micron DEIS document. The time provided is too short to review such large findings. One town hall for one hour is not enough to discuss concerns. This shows that you really don't care what local citizens have to say about something that will affect their homes and lives.

Kim Graziano
Sent from my iPhone

From: chipsnepa <chipsnepa@chips.gov>
Sent: Thursday, June 26, 2025 9:54 AM
To:
Cc:
Subject: FW: Wetland Mitigation Plan for Micron

From: Scott Harte <scott.harte@gmail.com>
Sent: Thursday, June 26, 2025 6:49 AM
To: chipsnepa <chipsnepa@chips.gov>
Subject: Wetland Mitigation Plan for Micron

I am wondering what considerations, if any, were made when selecting the sites regarding mosquito borne diseases that are endemic to this area? Adding wetlands to areas of Oswego County such as Hastings that have regularly tested positive for both Eastern Equine Encephalitis and West Nile Virus seems concerning in this regard. Will these new wetlands be constructed to minimize mosquito production by managing water flow, vegetation, depth, etc? Will there be disease vector monitoring done at these new sites?

From: chipsnepa <chipsnepa@chips.gov>
Sent: Thursday, June 26, 2025 10:59 AM
To:
Subject: FW: Extend Micron Comment Period

From: Stretch ASMR <mmjagusah@gmail.com>
Sent: Thursday, June 26, 2025 10:36 AM
To: chipsnepa <chipsnepa@chips.gov>
Subject: Extend Micron Comment Period

Hello Onondaga County Industrial Development Agency,

Our community in Onondaga County needs more time to review what Micron has proposed. There is far too much for us to read and understand as community members before August 11th. Please extend the comment period to 150 days. Many of us are likely to be affected by the proposed changes to our natural environment, and we have a right to know about what exactly Micron is planning before that plan is approved.

It is also a well known fact that many members of our community have difficulty accessing these comments, and thus their opinions often are brushed aside. This is especially true for our most affected members of the community, who frequently show up in person but do not have access to or a thorough understanding of the necessary technology to make comments online.

Scheduling multiple meetings, please include at least five, would allow the community to fully participate.

Best,
MoAde M. Jagusah

From: chipsnepa <chipsnepa@chips.gov>
Sent: Thursday, June 26, 2025 4:31 PM
To:
Cc: Viola, Peter R. (Fed)
Subject: FW: Micron Project
Attachments: 2025 06 26 Extension request.pdf

From: Murphy, Ashley <murphy@RuppPfalzgraf.com>
Sent: Thursday, June 26, 2025 4:21 PM
To: chipsnepa <chipsnepa@chips.gov>
Cc: Demarest III, William F. <demarest@RuppPfalzgraf.com>; Webster, Richard <webster@RuppPfalzgraf.com>
Subject: Micron Project

Good afternoon,

Attached please find correspondence from attorney Richard Webster as it relates to the Micron Project. A hard copy of the original letter will also be sent via FedEx.

Very truly yours,
Ashley Murphy

Ashley Murphy
Paralegal



24 Aviation Road, Suite 204 | Albany, New York 12205 | 518.432.4100 ext. 451 | email | website



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June 26, 2025

Express mail to:
Onondaga County Industrial Development Agency
ATTN: Micron Project
335 Montgomery Street, 2nd Floor
Syracuse, New York 13202

Email to: CHIPSNEPA@chips.gov

Request for Extension of Comment Period for the Micron Project

To whom it may concern:

We are writing on behalf of our client Jobs to Move America (“JMA”). JMA is a strategic policy center that advocates for climate policies that center worker and community voices. Our client recognizes that public investments in advanced technologies and critical climate infrastructure can create millions of good jobs for workers, especially those who have historically been denied good jobs in the manufacturing sector.

Yesterday, the CHIPS Program Office (“CPO”) and the Onondaga County Industrial Development Agency (“OCIDA”), as Lead Agencies for National Environmental Policy Act (“NEPA”) and State Environmental Quality Review Act (“SEQRA”), review, released the Draft Environmental Impact Assessment (“DEIS”) for the Micron Project. According to the Notice of Availability comments must be provided by August 11, 2025. In addition, oral public comments will be taken on July 24, 2025.

As a matter of law, SEQRA contains a “statutory obligation to provide a **reasonable and meaningful opportunity** for public comment.” *Matter of West Village Committee v Zagata*, 242 A.D.2d 91, 98 (3d Dept. 1998). While regulations specify a **minimum** comment period, no upper limit is stated. 6 NYCRR 617.12(a)(2)(iii). Similarly, under NEPA, the public must be provided an opportunity for meaningful participation through the comment process. *Florida Power & Light Co. v. United States*, 846 F.2d 765, 771 (D.C.Cir.1988) (holding that, not only must an agency give adequate time for comments, but it also “must provide sufficient factual detail and rationale for the rule to permit interested parties to comment meaningfully”). A month and a half is an unreasonably short period of time for written comments on a project and a DEIS

of this magnitude. Even more unreasonable is the expectation that the public make oral comments less than one month from the publication of the availability notice.¹

The DEIS is approximately 20,000 pages in 22 volumes. The pdf files are collectively over 1 GB in size. Seven large engineering firms were engaged to complete the DEIS, along with CPO, OCIDA, and Micron staff. Micron submitted an early draft of the DEIS to CPO and OCIDA in late December 2024. CPO and OCIDA then took approximately six months to make the report complete enough to present to the public. In total, the DEIS took Micron, CPO, and OCIDA over a year and a half to complete following the Final SEQRA Scoping issued in December 14, 2023. The scale of the assessment is not surprising because the Micron Project is one of the biggest, if not the biggest, projects in New York ever assessed under SEQRA and NEPA. What is surprising is that CPO and OCIDA expect the public to read, analyze, and meaningfully comment on this huge report in such short time periods.

The issues to be addressed are complex. The DEIS identifies the following 16 areas of environmental analysis: Land Use, Zoning, and Public Policy; Geography, Soils, and Topography; Water Resources; Biological Resources; Historic and Cultural Resources; Air Quality; Greenhouse (GHG) Emissions, Climate Change, and Climate Resiliency; Solid Waste, Hazardous Waste, and Hazardous Materials; Human Health and Safety; Utilities and Infrastructure; Transportation and Traffic; Noise and Vibration; Visual Effects and Community Character; Community Facilities, Open space, and Recreation; Socioeconomic Conditions; and Environmental Justice. It identifies Unavoidable Significant Adverse Effects to Water Resources, Biological Resources, Climate Change, Transportation, and Noise.

A project and investment of the size of the Micron Project will create far reaching secondary impacts. As a subset of those effects, the power consumption is projected to be approximately 11% of New York's total supply. Although Micron has committed to using 100% renewable energy it is unclear how this will be provided. This additional demand for electricity could have major consequences. It is probably not coincidental that Governor Hochul directed state agencies to develop an upstate nuclear plant two days ago.² In addition, there are Disadvantaged Communities ("DACs") in Syracuse close to the project site. Without careful management, the effect of creating 40,000 jobs in the area could worsen conditions for DACs and affordable housing. These issues and many others, such as wetlands mitigation, PFAS treatment, and analysis of alternatives, are complex. A careful review of how they are addressed in the DEIS will take time

As mentioned above, SEQRA and NEPA requires agencies to provide a reasonable and meaningful opportunity for public comment. What is reasonable is somewhat subjective. However, we note that a 41-day comment period was provided for the scoping of this project.

¹ There is a strong precedent for extensions of DEIS comment periods as there are numerous examples of extensions in New York of DEIS comment periods for smaller projects over the decades that SEQRA has been governing environmental review of projects in New York State.

² <https://www.governor.ny.gov/news/governor-hochul-directs-new-york-power-authority-develop-zero-emission-advanced-nuclear-energy>

June 26, 2025

Page 3

The DEIS is a massive document that is far more voluminous and complex than the draft scope. Therefore, a 45-day comment period is wholly unreasonable and fails to provide the “meaningful opportunity for public comment” that SEQRA and NEPA require.

We therefore respectfully request that the comment period be extended to 120 days or October 22, 2025.

Thank you for your consideration.

Yours sincerely,

A handwritten signature in black ink, appearing to read "R. Webster", with a long, sweeping flourish extending to the right.

Richard Webster, Esq.

From: chipsnepa <chipsnepa@chips.gov>
Sent: Monday, June 30, 2025 1:14 PM
To:
Subject: FW: Micron

From: Jordan Curtis <jcurtisbayberry@gmail.com>
Sent: Friday, June 27, 2025 9:42 AM
To: chipsnepa <chipsnepa@chips.gov>
Subject: Micron

To Whom It May Concern:

Relative to the MICRON Draft EIS 2025, a few things should be addressed:

- the Micron fabs will draw massive amounts of electrical power. With the footprint (i.e., roof space) of the fabs, solar panels should be installed to cover as much of the roofs as possible. This will help alleviate some of the load on the grid and actually helps cool roofs and, consequently, interior spaces.
- the Micron fabs are going to draw massive amounts of water. Gray water systems should be installed to alleviate some of the water draw. While gray water cannot be used for manufacturing the chips, it can be used for toilets and basic cooling.
- it seems, as stated in the EIS, numerous endangered species are present where the fabs will be built. For example, certain bat species will be displaced. Bat boxes should be placed on site. Bats are important to the ecosystem (e.g., they eat mosquitos). Native plants should be used in any landscaping. Trees should be left in place where possible instead of just clear-cutting the entire site. Wetlands should be implemented into the design; removing wetlands and recreating them elsewhere is overall detrimental to long-term viability of species.

Thank you for your time.

Jordan Curtis

From: chipsnepa <chipsnepa@chips.gov>
Sent: Monday, June 30, 2025 1:15 PM
To:
Subject: FW: Please oh Please

-----Original Message-----

From: mauw41 (null) <mauw41@aol.com>
Sent: Saturday, June 28, 2025 2:21 PM
To: chipsnepa <chipsnepa@chips.gov>
Subject: Please oh Please

I hope for all of Micron to move on.

There are many areas that have enough acreage with no interference to a community like Clay
GET OUT!!!!!!!

Sent from my iPhone

From: chipsnepa <chipsnepa@chips.gov>
Sent: Monday, June 30, 2025 1:14 PM
To:
Subject: FW: Micron Project

From: Theo Longfellow <theobabka@gmail.com>
Sent: Friday, June 27, 2025 9:48 AM
To: chipsnepa <chipsnepa@chips.gov>
Subject: Micron Project

We need AT LEAST 120 days for our communities to review the Micron DEIS document. We cannot do more damage to the environment of NY and need to assess environmental impacts

Best

Alyson Shotz

From: chipsnepa <chipsnepa@chips.gov>
Sent: Monday, June 30, 2025 1:14 PM
To:
Subject: FW: More time

From: ackerperson <ackerperson@yahoo.com>
Sent: Saturday, June 28, 2025 6:24 AM
To: chipsnepa <chipsnepa@chips.gov>
Subject: More time

We need more hearings. We need to protect our environment.

Sent from my Galaxy

From: Judith Barish <info@chipscommunitiesunited.org>
Sent: Tuesday, July 1, 2025 12:31 PM
To: chipsnepa
Subject: Attn: Micron Project -- Please extend comments

Dear Chips Office,

Chips Communities United urges you to extend the period for public comment for the Micron Project in Clay NY. 45 days is nowhere near long enough for the public to read and respond to the almost 20,000 pages of documents in the draft EIS. (Note that city and county officials, whose job it is to address this matter, extended their own period of reading and processing the comments before releasing them to the public.) We call on you to provide 120 days of public comment with public hearings on more than one day.

This is a massive project that will have an enormous impact on the community and natural resources: please proceed in a responsible, accountable manner.

Yours,

Judith Barish

* * * * *

Judith Barish (she/her), Coalition Director
510-759-9910

info@chipscommunitiesunited.org
www.chipscommunitiesunited.org



The US is spending billions of dollars to expand semiconductor manufacturing.
Let's make sure this investment benefits all of us.

From: chipsnepa <chipsnepa@chips.gov>
Sent: Monday, June 30, 2025 4:06 PM
To:
Subject: FW: Micron Environmental Statement

-----Original Message-----

From: Betty Carlisle <spdoc2@gmail.com>
Sent: Monday, June 30, 2025 3:29 PM
To: chipsnepa <chipsnepa@chips.gov>
Subject: Micron Environmental Statement

Micron and officers of CHIPSNEPA government agency

I is disturbing that an over 20,000 page document is made available with only a 45 day period to review and comment

This shows that Micron and its enablers do not want transparency and we the public must just accept it is 'for our own good'

This document supposedly addresses Air, Water, Waste, Transportation and other issue that will surely come from its plans if allowed to stand as is.

I Urge and in fact Demand that the review and comment period be extended to more than 45 days and certainly there should be more than one open hearing with comments from the public. What is Micron and government officers afraid might be exposes?

If all is well then good but I doubt this could be any better obtusfiscated so what is not being said. Give the public a chance to find the hidden dangers of this massive project so that if any benefits accrue to the good of the community they will not be tainted by poorly executed project.

Betty Carlisle
Brewerton, NY

From: chipsnepa <chipsnepa@chips.gov>
Sent: Monday, June 30, 2025 1:15 PM
To:
Subject: FW: Micron EIS - Clay NY

From: Paul Doody <pauldoody1978@gmail.com>
Sent: Sunday, June 29, 2025 11:00 AM
To: chipsnepa <chipsnepa@chips.gov>
Subject: Re: Micron EIS - Clay NY

I wanted to follow up on the comment I provided last week. First I was hoping you could confirm you received my comment, and I think it would be helpful if you would send confirmation of receipt to all commenters.

Secondly I recognize the desire to begin clearing activities this winter to accommodate the environmental window for disturbance to endangered species. However as noted in my original comment I believe an extension to the public comment period is warranted based on the magnitude of this project and its importance to our community, the state of New York as well as our national security. As such, one option to consider is for the regulatory agencies to issue a conditional approval for clearing activities prior to final issuance of the full EIS. The agencies could initially focus their review of public comments on clearing-related elements and then issue an approval for clearing with any conditions typically employed along with any to address public comments. The issuance of the final EIS for the entire project could then follow under the typical process. I recognize this isn't ideal for the regulatory agencies but it would facilitate a way to provide the public with ample time to review, digest and comment on the EIS while allowing the construction to commence in 2025.

Finally I would point out that NEPA provides for a minimum of 45 days of public review, and recognizes that extensions can be provided based on numerous factors. I would argue that this project absolutely warrants a longer comment period. Thank you again for the opportunity to comment on this transformative project in Central NY.

Paul Doody
pauldoody1978@gmail.com
315-409-5643

On Jun 25, 2025, at 5:48 PM, Paul Doody <pauldoody1978@gmail.com> wrote:

Thank you for the opportunity to review the EIS for the proposed semiconductor fabrication facility being built by Micron in Clay NY. I plan on submitting comments and have accessed all the available documents. I am a retired chemical engineer, spending the early part of

my career working at a semiconductor facility as a facilities chemical/environmental engineer so I have a keen interest in reviewing the EIS. In my personal planning to review the EIS, I observed the following:

1. The main body of the EIS is 719 pages
2. The appendices are in numerous files (18 total Appendices (A-R) in 19 files) totaling 19,251 pages. Note the Transportation appendix is 12,369 pages alone which may be of most interest to general public.
3. The total number of pages to review is 19,970 pages

I believe the proposed review period of 45 days is not sufficient for the public to be able to review such a consequential document. If I (or anyone else in the public) had nothing else to do we need to read 444 pages/day to get through the entire document in 45 days, which leaves no time to write up comments. We are now in summer season and most people, including myself, have many other things going on so in my opinion 45 days is woefully insufficient to be able to adequately review the report and develop meaningful comments. The public deserves more time and it would be helpful if the EIS team could hold several public sessions to present their findings (consider covering different specific topics each session) and answer questions. I realize you all have a desire to start construction but this important investment in our community deserves ample time for the public to fully understand what the impacts are expected to be, and it's in Micron's and the public agencies' interest to have the public fully prepared for what's to come, so I respectfully request we be provided 120 days to review the documents and submit comments. This would take the pressure off having to sacrifice vacation or family time over the summer and allow some review time in the fall. Thank you for the opportunity to review and comment on the documents as well as your consideration to extend the public review period.

Paul Doody
pauldoody1978@gmail.com
315-409-5643

From: Mary Finneran <msfinn123@yahoo.com>
Sent: Monday, June 30, 2025 11:01 PM
To: chipsnepa
Subject: Micron Project public comment

Onondaga County IDA
Attn. Micron Project
Syracuse, NY

Please extend the public comment period on the Draft EIS to 120 days, 45 days is insufficient for the deep dive necessary to study and comment on a project that would use more water than the city of Syracuse and as much energy as the states of Vermont and New Hampshire combined.

To quote from an email sent to me

This is not nearly enough time or opportunity for members of the public to carefully review and provide meaningful input on the lengthy DEIS (it has almost 20,000 pages of appendices!) for Micron's \$100 billion plan- the largest industrial development project in NY State history and the largest microchip fabrication facility in US history. Micron is receiving \$5.5 billion in NY Green CHIPS Act subsidies and upwards of \$20 billion in total public subsidies.

To be truly a public comment period enough time must be provided. Please extend the comment period and increase the number of in person public hearings to at least three.

Thank you.

Mary T. Finneran, Cairo, NY

You can't separate peace from freedom. mx

From: chipsnepa <chipsnepa@chips.gov>
Sent: Monday, June 30, 2025 1:11 PM
To:
Subject: FW: Micron comment period

From: david Griola <david.griola@gmail.com>
Sent: Thursday, June 26, 2025 7:42 PM
To: chipsnepa <chipsnepa@chips.gov>
Subject: Micron comment period

As i understand, the deis report is thousand pages long. To only allow 45 days to comment is ludicrous. People are asking for 120 days to facilitate understanding and then commenting. It is the right thing to do.

From: chipsnepa <chipsnepa@chips.gov>
Sent: Monday, June 30, 2025 1:15 PM
To:
Subject: FW: Micron DEIS

From: Regan Hayes <reganhayes2018@gmail.com>
Sent: Saturday, June 28, 2025 9:47 AM
To: chipsnepa <chipsnepa@chips.gov>
Subject: Micron DEIS

Like thousands of other CNY residents,
I feel that 45 days to review the DEIS
is insufficient. We're requesting that
the review period be extended to 120 days. Thank you.

From: chipsnepa <chipsnepa@chips.gov>
Sent: Monday, June 30, 2025 4:06 PM
To:
Subject: FW: Comment on CNY Micron project & DEIS

From: Kellogg, Syd <kellogcd@lemoyne.edu>
Sent: Monday, June 30, 2025 3:53 PM
To: chipsnepa <chipsnepa@chips.gov>
Subject: Comment on CNY Micron project & DEIS

To whom it may concern, as a constituent of Central New York and Onondaga county, I strongly oppose the plan to bring Micron to Clay. The project will create many problems for the community and surrounding areas, as laid out in the 2,000 page DEIS released for public examination. Some of these problems include the massive consumption and redirection of public water sources to Micron, and the carbon waste that will be created as a result of their chip production. As a resident of the area and opponent of the project, it is only fair that my voice, along with the many other residents', are heard and allowed a chance to speak. Which is why I request that OCIDA and Micron extend the review period from 45 days to 120 days, and allow at least 5 public hearings for comment. Many residents aren't happy with the proposed consequences of bringing this project to CNY, and as taxpayers who are funding the project, they have a right to receive the most time and opportunity possible to read the statement, and make comments on the project. I hope that you will take these comments seriously and make appropriate accommodations that are truly in the best interest of the people who live here. Thank you for your time.

-- Sincerely,
Syd Kellogg - (They/Them)
Le Moyne College 26'
B.A. Communications
Peace Action Le Moyne | **President**
PRISM | **President**

From: chipsnepa <chipsnepa@chips.gov>
Sent: Monday, June 30, 2025 1:15 PM
To:
Subject: FW: Extend period for public comment on Micron plant to 120 days

From: Martha Lain <martha.lain@gmail.com>
Sent: Sunday, June 29, 2025 3:30 PM
To: chipsnepa <chipsnepa@chips.gov>
Subject: Extend period for public comment on Micron plant to 120 days

I am a New York resident. When a huge project such as the Micron Chip plant proposed for Onondaga county is being considered, I believe that the community affected should have adequate time to study the EIS and carefully consider the impact of the project. If it is a good fit for the community, then almost everyone will be supportive. If it is not, it should be modified, or in extreme cases, should not be built.

Here in Orange county where I live, we are saddled with a huge gas power plant that was never properly permitted but was built anyway. Once something is built, it is very hard to undo the momentum, so despite ongoing hardship and protest, we everyday residents are forced to live with it.

Give people time to learn about what is proposed and make suggestions so that the best possible plant with the least negative consequences is the one that is built.

Thank you for taking my comment.

Martha Lain

From: chipsnepa <chipsnepa@chips.gov>
Sent: Monday, June 30, 2025 1:13 PM
To:
Subject: FW: Micron Environmental Impact

-----Original Message-----

From: Maggie Shayne Lewis <maggie.shayne@gmail.com>
Sent: Thursday, June 26, 2025 9:13 PM
To: chipsnepa <chipsnepa@chips.gov>
Subject: Micron Environmental Impact

We cannot replace the earth's deep underground reservoirs of water. Rain doesn't do that, it only replaces surface water, streams, lakes, oceans, evaporation, clouds, more rain. The ground water is not replenished, and we have already taken so much of it that we have measurably changed the tilt of her axis.

We do not need chips. Corporations and governments and the uber rich think we need chips, but what we actually need is clean air, clean water, and planet compatible with our survival, and those are things we are destroying at an unbelievable rate.

Our grandchildren will never forgive us for putting profit and "keeping up with China" ahead of protecting the only home they'll ever have.

The harm done by building micron, the PFAS forever chemicals, the guzzling of water, the displacement of wildlife and clearing of carbon storing trees and wildlands—it's shortsighted, selfish, greedy, and unforgivable.

I have 13 grandchildren and 3 great grandchildren who are going to have to live on this planet for the next eighty years, and they'll have kids who will go on longer. But only if humans change their perspective immediately.

We are out of time. We can't wait around for the slow-witted to wake up. We must put the planet first NOW.

Maggie Shayne Lewis
Novelist
Born and raised in CNY

From: chipsnepa <chipsnepa@chips.gov>
Sent: Monday, June 30, 2025 1:11 PM
To:
Subject: FW: Extend comment period

From: Amanda Lyons <amandalyons1124@gmail.com>
Sent: Thursday, June 26, 2025 4:16 PM
To: chipsnepa <chipsnepa@chips.gov>
Subject: Extend comment period

Please extend the comment period on the environmental impact to 120 days. The length and detail in the document doesn't give adequate review time for local residents that have full time jobs to review and comment. A project of this size will impact those of us living in a 2 mile radius substantially over the next several years.

Thanks
Amanda Lyons

From: chipsnepa <chipsnepa@chips.gov>
Sent: Monday, June 30, 2025 1:14 PM
To:
Subject: FW: DEIS documents

-----Original Message-----

From: MARY MCCOY <rtoad21@aol.com>
Sent: Friday, June 27, 2025 6:14 AM
To: chipsnepa <chipsnepa@chips.gov>
Subject: DEIS documents

Sent from my iPhone Allow at least 120 days for communities to review the DEIS documents.
Mary McCoy

From: chipsnepa <chipsnepa@chips.gov>
Sent: Monday, June 30, 2025 1:15 PM
To:
Subject: FW: micron report

From: Paula Peters <squirrelgirl457@yahoo.com>
Sent: Sunday, June 29, 2025 8:13 AM
To: chipsnepa <chipsnepa@chips.gov>
Subject: micron report

I would like to share my opinion on micron impact on the environment. I hope people's opinions matter. I worry about the effects it will have on wildlife, wetlands, water quality of life and global warming. It seems to me there are many more negatives than good things to this project. Can our area really support more people living here without ruining more of the green space displacing more wild life that would have to happen so that land could be developed to put in more homes to house people who would in turn maybe who would have children who might need more housing in the area, and by the time your done there would be no green space left which would lead to more global warming which I thought our governor was trying to fight with her initiatives. Also what if on some odd chance the technology changes or if Micron goes out of business like companies do sometimes .we destroyed land trees and habit for nothing. I don't know if you can get that back. I hope this is read and peoples opinions are given some consideration.

From: chipsnepa <chipsnepa@chips.gov>
Sent: Monday, June 30, 2025 1:12 PM
To:
Subject: FW: MAKE MICRON DO RIGHT!

From: Wendy Ryden <Wendy.Ryden@liu.edu>
Sent: Thursday, June 26, 2025 8:56 PM
To: chipsnepa <chipsnepa@chips.gov>
Subject: MAKE MICRON DO RIGHT!

This enormous proposal needs at least 120 days for public review!

From: chipsnepa <chipsnepa@chips.gov>
Sent: Monday, June 30, 2025 1:13 PM
To:
Subject: FW: I am requesting AT LEAST 120 days for our communities to review the Micron DEIS document.

From: V RA <vroundsa@gmail.com>
Sent: Thursday, June 26, 2025 11:14 PM
To: chipsnepa <chipsnepa@chips.gov>
Subject: I am requesting AT LEAST 120 days for our communities to review the Micron DEIS document.

The **public comment period** for this massive factory project, which will use more water than the city of Syracuse and as much energy as the states of Vermont and New Hampshire combined, is only 45 days long- open **until Monday, August 11, 2025-** with only one day of public hearings announced on July 24, 2025.

This is not nearly enough time or opportunity for members of the public to carefully review and provide meaningful input on the lengthy DEIS (it has almost 20,000 pages of appendices!) for Micron's \$100 billion plan- the largest industrial development project in NY State history and the largest microchip fabrication facility in US history. Micron is receiving \$5.5 billion in NY Green CHIPS Act subsidies and upwards of \$20 billion in total public subsidies.

- [All major traffic improvements](#), including a brand-new exit on Interstate 81 in Cicero and a complete redesign of the I-81/Route 31 intersection, would be done by 2031. The state has estimated previously [that would cost \\$350 million](#).
- While Micron and public agencies will do their best to ease some impacts, there would be "unavoidable significant adverse effects." Among those: a huge increase in greenhouse gas emissions, destruction of more than 200 acres of wetlands, noise from construction and traffic, and loss of habitat used by five species of rare bats and birds.
- Local firefighters would be trained on how to deal with potential construction hazards, and Micron would establish a medical clinic on site staffed with a doctor and other healthcare professionals.
- While Micron pledges to use 100% renewable electricity, it would also burn as much natural gas as 107,000 typical New York state households.
- Onondaga County could add 23,500 households by 2041. The city of Syracuse could see an increase of 7,500 households.

Thank you for your consideration of these serious concerns.

From: chipsnepa <chipsnepa@chips.gov>
Sent: Monday, June 30, 2025 1:13 PM
To:
Subject: FW: Micron

-----Original Message-----

From: Karen Waelder <karenjkw@hotmail.com>
Sent: Thursday, June 26, 2025 9:54 PM
To: chipsnepa <chipsnepa@chips.gov>
Subject: Micron

I have so many questions and concerns about the impact Micron will have on the Central New York environment. What about habitat destruction? What about the huge amount of water that would be used? What about the loss of wetlands?

The public needs a lot more time to be able to read and digest the report and then be able to comment. The present time frame is totally unrealistic.

And where is the planning for schools and health care facilities and housing for all of these new residents? Where's the plan for public transportation so 9000 employees don't drive to work adding to the congestion and pollution?

Micron will dramatically transform Central New York. Why not make sure the transformation is one that benefits everyone who lives here?

Sent from my iPhone

From: chipsnepa <chipsnepa@chips.gov>
Sent: Monday, June 30, 2025 1:13 PM
To:
Subject: FW: Micron

-----Original Message-----

From: SUSAN RILEY-WALDRON <susanrileywaldron@yahoo.com>
Sent: Thursday, June 26, 2025 11:01 PM
To: chipsnepa <chipsnepa@chips.gov>
Subject: re: Micron

Hello,

I read the report about the 10 percent increase in water use and waste water which will be produced, increase traffic and overpopulation, and it is very disturbing that our beautiful finger lakes region will have another polluting company similar to allied chemical and crucible steel who made Onondaga lake a toxic dump.

I pray that your company goes somewhere else, but unfortunately that doesn't seem to be the case.

Plus we will be getting another nuclear power plant in upstate ny, as if we don't have enough pollution coming our way from your chip company.

thanks for listening,

Sue

From: chipsnepa <chipsnepa@chips.gov>
Sent: Monday, June 30, 2025 1:12 PM
To:
Subject: FW: Micron in Central New York

-----Original Message-----

From: Chris Williams <yosemitechris@icloud.com>
Sent: Thursday, June 26, 2025 7:56 PM
To: chipsnepa <chipsnepa@chips.gov>
Subject: Micron in Central New York

Please fast track this project. We need these jobs.

From: Elizabeth Herrick <elizarah@gmail.com>
Sent: Tuesday, July 1, 2025 3:56 PM
To: chipsnepa
Subject: Micron Public Comment Period

Hello,

My name is Elizabeth Herrick and I am writing as a concerned citizen in Liverpool, NY regarding the limited public comment period for the recently published 20,000+ page impact report for the Micron chip fab factories in Clay near my home. Currently, the comment period is only 45 days which severely restricts the community from necessary discussion and dialog on the immense impacts of these factories. I write to you to request the comment period be extended to 120 days to allow for more input, considerations, and accountability.

Thank you for your time and consideration.

Thank you,
Elizabeth Herrick

From: Jennifer Valentine <faboo1028@gmail.com>
Sent: Wednesday, July 2, 2025 6:26 PM
To: CHIPSNEPA@chips.gov
Subject: Micron Semiconductor Plant Construction

The construction of this facility would decimate over 400 acres of wetlands and carry an undetermined amount of PFAS through Ondondaga County water transmission lines to Lake Ontario and eventually the Upper St. Lawrence River.

Please do not allow this - thank you, Jennifer Valentine

From: Octavia Wilcox <octavia.wilcox@yahoo.com>
Sent: Thursday, July 3, 2025 5:27 AM
To: chipsnepa
Subject: Hazardous waste disposal

The public needs to understand in plain English not scientific jargon the following:

1. What impact will the building and start up will have on water supply to surrounding communities?
2. The transporting of hazard material - is it done by rail?
3. If it is done by rail what is the impact on communities if the materials are leaked into the environment; and how would the derailment impact the air quality for those immediate communities?
4. Are there cancer causing / other health possible concerns to workers and communities
5. If so is Micron willing to be responsible for medical bills of those impacted by the harmful effects of hazardous materials.
6. Will there be a stipulation that Micron will be responsible for cleaning up areas that would be impacted by hazardous materials.
7. A list of possible health issues that workers/ or community will be exposed to and the sharing of health information that other micron workers or communities who work in similar facility as the one projected for our community .

The above questions are what I would like answered. I also have suggestions on how to create a sustainable work force. Pease contact me if you have question regarding the questions presented, how to create sustainable quality work force.

Thank you,

Wow Inc.

Octavia Wilcox - President of WowO

POBox 2312

Liverpool, NY 13089

Ps forgive the grammatical errors

[Sent from Yahoo Mail for iPad](#)

From: Walker M <masiclat.walker@gmail.com>
Sent: Friday, July 4, 2025 12:56 AM
To: CHIPSNEPA@chips.gov
Subject: Extend the Micron Comment Window

To whom it may concern,

You're fast-tracking the largest industrial project in New York history with barely enough time to read the footnotes, let alone 20,000 pages of appendices. One hearing and 45 days for \$100B in development, \$20B in subsidies, and environmental impacts that dwarf entire states? That's not due diligence. That's negligence.

Extend the comment period to **at least 120 days** and schedule **no fewer than five public hearings**.

Walker Masiclat
Sent from my iPhone

From: Allison Thomas <allison.thomas4297@gmail.com>
Sent: Friday, July 4, 2025 8:38 AM
To: CHIPSNEPA@chips.gov
Subject: Micron

On the day of our countries established Declaration of Independence, I urge you to give us - “The People” 120 days to review the environmental impact of Micron on our lives now and the lives of our children and grandchildren.

In anticipation of your consideration.

Allison Thomas, NPP-BC
Sent from my iPhone

From: Gavin <gavinl@protonmail.ch>
Sent: Sunday, July 6, 2025 8:58 PM
To: CHIPSNEPA@chips.gov
Subject: MICRON Draft EIS 2025 Comment

Hello,

Please accept the following comment on the MICRON Draft EIS.

New York State's signature climate law, CLCPA, contains the following:

"The department shall . . . establish a statewide greenhouse gas emissions limit as a percentage of 1990 emissions, as estimated pursuant to section 75-0105 of this article, as follows:

1. 2030: 60% of 1990 emissions.
2. 2050: 15% of 1990 emissions.

Greenhouse gas emission limits shall be measured in units of carbon dioxide equivalents and identified for each individual type of greenhouse gas."

My overriding concern is that the Micron project stands in direct opposition of the state's greenhouse gas (GHG) emissions goals, and much more needs to be done to both clarify the true likely emissions of the Micron project, and to mitigate those emissions so that it is not a barrier to CLCPA law by both 2030 and 2050.

The DEIS clearly states that the facility requires 698,112 MCF of natural gas per month by full build-out in 2041. However, Appendix J, Greenhouse Gas Emissions, Climate Change, and Climate Resiliency, only accounts for part of Scope 1 emissions, using the language of the Greenhouse Gas Protocol. Emissions sources are listed as:

- Natural gas-fired boilers;
- Natural gas-fired water bath vaporizers;
- Diesel-fired emergency generator engines;
- Diesel-fired emergency fire pump engine;
- Semiconductor process tools and thermal oxidation systems that emit GHGs;
- Use of heat transfer fluids (HTFs) that contain GHGs; and
- Use of Circuit Breakers that contain SF6.

This analysis did not include other emission sources, including:

- Scope 1 - company vehicles.
- Scope 2 - purchased energy (natural gas, electricity); purchased heating and cooling.
- Scope 3 Upstream activities: leased upstream assets; employee commuting; purchased goods and services (e.g. raw materials from mining, etc.); business travel; emissions from waste; transport and distribution into the Micron facility.
- Scope 3 Downstream activities: transport and distribution out of Micron; processing of sold product; use of sold products; leased downstream facilities; end-of-life treatment of the fabrication plants.

Nor did it appear to include the anticipated carbon footprint of construction.

Without an analysis of the true scope of emissions over the lifetime of this project, it is impossible to understand the climate impact, and impossible for New York State to meet its goals under CLCPA law.

Aside from that observation, no efforts appear to be made on electrification of industrial processes. Why can the boilers and vaporizers not be electrified? At an absolute minimum, if the technology does not exist today, work with partners to develop it by Phase 2 of the project. Without a plan for significant electrification, New York State cannot hope to approach carbon neutrality or help combat the worst effects of global heating.

Thank you,

Gavin Landless

From: Aliyah Carver <carverlia@gmail.com>
Sent: Monday, July 7, 2025 4:28 PM
To: CHIPSNEPA@chips.gov
Subject: Micron DEIS Document

Hello.

I am writing as a resident of Onondaga County to express my concern over the implications of the upcoming Micron project. It is projected to cause environmental damage like increased carbon emissions and destruction of wildlife and natural habitats, as well as diverting public water. I am disturbed that OCIDA and Micron gave the public only 45 days to review the DEIS document, and I request that this decision be changed to allow for at least 120 days of review by local communities and 5 public hearings to comment on the plan.

Thank you for your consideration.

Aliyah Carver
(315) 729-9103

From: David Casales <david@agreeny.org>
Sent: Monday, July 7, 2025 11:07 AM
To: CHIPSNEPA@chips.gov
Subject: I request AT LEAST 120 days to review the Micron DEIS document.

I am requesting AT LEAST 120 days for me and our Syracuse and Central New York region communities to review the Micron DEIS document.

David Casella

From: Iben Falconer <Iben.Falconer@gmail.com>
Sent: Monday, July 7, 2025 9:27 PM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Micron project

Dear team,

I want to submit a comment about this project. Why is the comment period so short? Please adjust it to at least 120 days so that the community can fully review the DEIS document. This is a major project, with major impact on the local community, ecosystems and local power infrastructure. It should not be rushed.

Thank you!

Best,
Iben Falconer

From: Jessica Jones <jonesj5189@gmail.com>
Sent: Monday, July 7, 2025 11:37 AM
To: chipsnepa@chips.gov
Subject: ATTN: Micron Project

To whom it may concern,

The CNY community needs more time to review and comment on the Micron project, and the ways that it will environmentally impact our area. Communities need AT LEAST 120 days to review the Micron DEIS document, and allow for 5 public hearings for comment on the proposed plan.

We cannot allow this factory to decimate public water supply, disrupt local wildlife and ecosystems, or put unnecessary carbon emissions into our atmosphere.

Thank you for your time,

Jessica Jones
Public School Teacher

--

Jessica Jones
(she/her)

From: Kellogg, Syd <kellogcd@lemoyne.edu>
Sent: Monday, July 7, 2025 4:43 PM
To: CHIPSNEPA@chips.gov
Subject: Comment on CNY Micron project & DEIS

Dear whomever it may concern,

As a constituent of Central New York and Onondaga county, who will be affected by Micron's arrival to the area, I oppose the project's arrival and demand that you make necessary accommodations to combat the project's proposed damages to the environment and community before starting construction. As outlined in the 2,000 page document, that you have only allowed the public 45 days to read and comment on, Micron's arrival will bring unnecessary and costly challenges to the surrounding areas: air and noise pollution, water consumption and contamination, and destruction to rare wildlife. These are problems the people of Central New York, and Syracuse specifically, already face on top of issues of lead poisoning in public water systems, homelessness and poverty. These issues must be addressed first, if you wish to see economic prosperity for the region. Giving the people a chance and a better future will strengthen and grow the region better than any project or corporation will, especially when that corporation is projected to do more harm than good. Micron's proposed benefits will not reach the community in the next few years, as Micron will not even be fully built in that time, however, the communities tax money and resources will be used for the creation of Micron. In the time it takes Micron to be built and for "prosperity" to emerge, these resources could be used instead to address some of the problems listed above, and will have a greater benefit on the community. This is what the people want. I am sure if you extend the comment period on the DEIS to 120 days and allow more public hearings for the public to comment on the plan, you will see that the public does not want Micron here, or at least requires accommodations to be met before Micron's implementation. I urge you to make these considerations and to hear out the voices of the people before moving forward on this project. It is in your best interest.

Sincerely,

Syd Kellogg - (They/Them)

Le Moyne College 26'

B.A. Communications

Peace Action Le Moyne | **President**

PRISM | **President**

From: Isaac M <isaacm1231@gmail.com>
Sent: Monday, July 7, 2025 12:32 PM
To: CHIPSNEPA@chips.gov
Subject: Formal Comment Submission - Micron Semiconductor Manufacturing Project

Formal Comment Opposing the Micron Semiconductor Manufacturing Project

Isaac Matlock
Watertown, NY, 13601
isaacm1231@gmail.com
7/7/2025

To:
Robert Petrovich, Executive Director
Onondaga County Industrial Development Agency
Micron@ongov.net

CHIPS Program Office – CHIPSNEPA@chips.gov
New York State Department of Environmental Conservation
U.S. Army Corps of Engineers
U.S. Environmental Protection Agency

Subject: Formal Comment Opposing the Micron Semiconductor Manufacturing Project – Legal and Environmental Concerns

1. Destruction of Federally Jurisdictional Wetlands – Clean Water Act §§ 401 & 404

The DEIS acknowledges that the project will permanently destroy approximately 193 acres of federally regulated wetlands, with additional stream impacts. This constitutes a significant adverse effect under NEPA and SEQRA, and directly implicates Clean Water Act permitting. The proposed mitigation is inadequate relative to the scale of destruction and fails to address long-term ecological loss.

Request: Deny the Section 404 permit and associated Water Quality Certification under Section 401 based on the failure to demonstrate avoidance and minimization of impacts.

2. Irreversible Harm to Federally Protected Species – Endangered Species Act §7

The project poses unavoidable adverse effects to Indiana bats and northern long-eared bats, both federally listed species. Construction-related habitat destruction and lighting will disrupt foraging and roosting. The DEIS fails to provide binding mitigation measures that satisfy the 'no jeopardy' requirement under ESA Section 7.

Request: Delay any Record of Decision until formal consultation with the U.S. Fish and Wildlife Service is completed, and a Biological Opinion is made public. Deny approvals if the Biological Opinion finds likely jeopardy.

3. Incompatibility with New York's Climate Law – CLCPA

The project's greenhouse gas emissions are substantial and long-term, directly conflicting with the goals of the Climate Leadership and Community Protection Act (CLCPA). There is no clear demonstration that the project will comply with emission reduction pathways or offset its significant carbon footprint.

Request: NYSDEC must evaluate the project's compliance with CLCPA requirements in all relevant permits. No permit should be issued without a firm showing compatibility with the 2030 and 2050 climate targets.

4. Disproportionate Burden on Disadvantaged Communities – Environmental Justice Concerns

The project site borders multiple Disadvantaged Communities (DACs), as defined under state and federal screening tools. While the DEIS asserts minimal EJ impacts, it fails to conduct a cumulative burden analysis as required under NYSDEC Commissioner Policy 29 (CP-29) and pending SEQRA revisions.

Request: Require a Supplemental EIS that evaluates cumulative burdens on DACs and propose enforceable mitigation or denial if burdens are excessive.

5. Significant Adverse Traffic and Infrastructure Effects

The DEIS admits that even with mitigations, long-term traffic congestion will result from the 16-year construction timeline. These disruptions will have secondary environmental and public health impacts. The analysis lacks adequate long-term planning or funding assurances for transportation infrastructure.

Request: Deny local and state land use approvals until enforceable transportation improvement agreements are in place.

Conclusion

The DEIS fails to satisfy the legal standards of NEPA, SEQRA, the Clean Water Act, the Endangered Species Act, CLCPA, and EJ requirements. These deficiencies must be addressed through permit denials, supplemental review, or project cancellation.

I strongly urge the lead agencies to consider these legal and environmental concerns and reject or suspend the Micron Semiconductor Manufacturing Project until these fundamental concerns are resolved.

Sincerely,
Isaac Matlock

From: Rachel Bass <rachel.o.bass@gmail.com>
Sent: Tuesday, July 8, 2025 8:38 AM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Micron Project

Hello,

I'm a resident of the city of Syracuse and I am requesting at least 120 days for the public to review the DEIS document for this project, as well as five public hearings allowing comments on the proposed plan.

The environmental and social ramifications of an industrial development project this large are too great to forge ahead for the sake of expediency.

Regards,

--

Rachel Bass (she/they)

From: Alexis Cameron <alexis.cameron@gmail.com>
Sent: Tuesday, July 8, 2025 11:00 AM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Microchip facility

Hello

As a concerned NY voter I am asking you to extend the public comment period for this huge microchip facility. At a time when we need to seriously cut our emissions, building a factory that uses enormous amounts of energy and water without adequate environmental oversight is grossly negligent to the health of our communities. Please extend the comment period to get the information out to the people what this facility would actually mean.

Alexis Powers

From: Rebecca Canright <rebeccagroovypeace@gmail.com>
Sent: Tuesday, July 8, 2025 9:22 AM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Please require stronger, longer environmental review of Micron project

Greetings, as a young person, I thank you for your work. I care about investing in environmental protection and renewable energy. Protecting our environment is very important, and goes hand in hand with economic well-being.

I respectfully oppose this massive Micron factory project, which will use more water than the city of Syracuse and as much energy as the states of Vermont and New Hampshire.

Please let us preserve our beautiful region's environment. Reject this project, and also require a longer 120-day comment period.

Thank you for your time and consideration!

Have a great day,

Rebecca

--

Frigate birds fly for months over the ocean and can engage in both regular sleep and use half their brain at a time to sleep during soaring or gliding flight.



Compassion for all creatures great and small.

From: cynthia fredrick <fredrick.cynthia@gmail.com>
Sent: Tuesday, July 8, 2025 8:57 AM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Micron DEIS Document

We need at a *minimum* 120 days to review this very important document. Why only 45 days to submit comments about the environmental impacts from this massive fabrication process? Transparency will be key to this process. Thank you.

Sincerely,
Cynthia Fredrick

From: KELLY GUILLES <henryskelly@yahoo.com>
Sent: Tuesday, July 8, 2025 7:18 AM
To: chipsnepa
Subject: [EXTERNAL] Fw: MICRON Clay, NY

Hello,

I live at 5232 Caughdenoy Rd in Clay, NY. I'm very concerned about the traffic making a negative impact on our quality of life. I'd like to see "local traffic only" from the Caughdenoy off-ramp from 481 to Rt 11 in Cicero. It's very residential, and would help take away from the stress of noise pollution in my immediate community. I'd also like to see micron plant trees to help the endangered species survive, from whom they're taking their environment from. They should give residents trees that the bats are native to, to plant on their property. Thank you for your consideration.

-Kelly Giarrusso

From: John Rath <jrfree59@gmail.com>
Sent: Tuesday, July 8, 2025 1:58 PM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] more time needed to review Micron DEIS document

To Whom it may Concern:

Please consider this email as a formal request to increase the public comments period regarding Micron's DEIS statement from 45 day to 120 days. Summer is a time of vacations, travel and other distractions which make the 45 day limit very challenging for many potential commenters. Additional public hearing could also benefit the process of seeking additional input.

Thanks for your consideration of this request and please contact me if you'd like additional information.

John Rath

Yorktown Heights, NY

cell 817 442-8418

From: V RA <vroundsa@gmail.com>
Sent: Tuesday, July 8, 2025 11:06 AM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Micron in Onondoga County, NY

As a CNY citizen I **request AT LEAST 120 days for our communities to review [the Micron DEIS document](#).**
Thank you.

From: sammyam sammyam <iamsammyam@yahoo.com>
Sent: Tuesday, July 8, 2025 10:33 PM
To: chipsnepa
Subject: [EXTERNAL] Re: Micron Comment

Resending, as it looks like my previous email bounced back.

On Jul 8, 2025, at 10:30 PM, sammyam sammyam <iamsammyam@yahoo.com> wrote:

Hello,

I am submitting a comment in regards to the Micron project.

It is my understanding that a report outlining Micron's impact on the community and environment was released and is approximately 20,000 pages. It is also my understanding that only 45 days were provided for this report to be reviewed, which is an obscenely short amount of time for an expert to review 20,000 pages, and much harder for those of us who are not experts.

The comment period should be extended to a minimum of 120 days, with more public hearings taking place over a number of days.

While I don't live in Clay anymore, my parents live on Riverside Rd, off Oak Orchard. Micron will significantly impact them in terms of the changes to local infrastructure, their ability to get around, as well as the environmental repercussions from chemicals being released into the water that will flow through their backyard.

They, as well as every Central New Yorker deserve a reasonable amount of time to understand how Micron will change their lives and provide public comments on it.

Sincerely,
Sandy Wilson

From: Carol Hinkelman <carolhroc@gmail.com>
Sent: Wednesday, July 9, 2025 5:01 PM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Micron

Dear Sir,

Micron is a massive project in Onondaga County and will have a multitude of effects on the environment of the county. The Micron DEIS is a huge document to review and understand. 45 days is not nearly enough for people to read the document and understand the implications so they can make substantive comments. I urge you to extend the comment period to at least 120 days.

Thank you,

Carol Hinkelman

From: ruta Holmquist <rutaholm@yahoo.com>
Sent: Thursday, July 10, 2025 6:44 PM
To: chipsnepa
Subject: [EXTERNAL] Micron DEIS Document

Please allow AT LEAST 120 days for our communities to review the Micron DEIS document, and allow for 5 public hearings for comment on the proposed plan. This document is over 20,000 pages and needs a thorough review by the community to digest the potential negative impacts on our environment.

Thank You,
Ruta Holmquist
102 Harpers Court
Syracuse, NY 13214

[Sent from Yahoo Mail for iPhone](#)

Volcko, Mary E.

From: Kirsten Hopkins <denimgirl@juno.com>
Sent: Thursday, July 10, 2025 7:07 PM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Micron Project Public Comment

To whom it may concern,

As a NY state resident and a friend of people who live in a lovely home in Clay along the Oneida River, I am extremely concerned about the environmental impact of Micron Technology's microchip manufacturing project. I am also concerned that the public--especially the people who will be directly negatively affected by this project--do not currently have enough time to properly review and comment on this project.

Currently, the public comment period for this massive factory project, which will use more water than the city of Syracuse and as much energy as the states of Vermont and New Hampshire combined(!!!), is only 45 days long-with only one day of public hearings announced on July 24, 2025.

This is not nearly enough time or opportunity for members of the public to carefully review and provide meaningful input on the lengthy DEIS (it has almost 20,000 pages of appendices!).

Please extend the public comment period to at least 120 days and please schedule a minimum of 5 public hearings before going forward with this project.

Thank you,
Kirsten Hopkins
NY, NY 10034

From: Bob Peters <sretepbob@yahoo.com>
Sent: Thursday, July 10, 2025 9:29 PM
To: chipsnepa
Subject: [EXTERNAL] I'm Robert Peters and I have a long and important comment about Micron.

I'm Robert Peters of Jamesville, NY, and I'm commenting against Micron for several reason. One reason I'm against it, is that it will ruin an irreplaceable natural environment, for a company that will probably not keep any of their promises, in letter or in spirit, and probably leave once the tax breaks expire. Everything else that this County has given tax breaks or other benefits to, has never worked out like the people who want the tax breaks and benefits claim. DestinyUSA has to be the biggest example of this in this County that I have heard of. They promised, among other things, an aquarium and a replica of the Erie Canal. What we got instead was a rather standard mall with a mishmash of flooring, that also bounces when people walk by. Also other places have had private projects supported by the government not work out. Examples include that Foxconn factory in Mount Pleasant Wisconsin that never got used, damaged the village's credit rating, and ended up becoming a data center site, and that research facility expansion in New London, Connecticut that was canceled after a merger that lead to the research facility being closed and the area looking like a slum.

Another reason that I'm against it, is that it will take 20 years to build and that is a long time in real terms, and an eternity in tech terms. For example a child born today, could be in their 2nd year of college in 20 years, if they decide to go to college. Who knows what innovations in technology there will be in 20 years, innovations that could render the plant obsolete before it's even half way finished. People didn't expect 20 years ago that the computer company that uses a logo that is a piece of fruit with piece bitten out of it, wouldn't be using the architecture that they had transitioned to at the time, 20 years later. Nor that they would radically change what we thought of a cell phone, nor that they would have developed their own CPU chips for their computers. That also applies to other businesses, as I wasn't thinking at the time that the last new brand to be introduced by a major automaker, wouldn't actually be around 20 years later.

It's entirely possible that a completely new way of making chips emerges that renders the current technology obsolete overnight. It's also possible that memory and storage starts getting put on the CPU die in 20 years, to save board space.

Also Micron also only makes commodity chips, and not anything that is really unique, so they are also easily replaced with another company's chips. Other companies actually make chips with some differentiation in functionality and performance. Micron only makes chips that have to be made to a standard, so there isn't any product differentiation between them and other makers of the same kinds of chips.

Another reason that I'm against it, is that 20 years is a long time in both political and business terms. A lot can change in both the business and political worlds in a day or two, let alone 20 years. A modern publicly traded business goes quarter-by-quarter basis, and not on a long term plan. A tech company can go from being on top to being bankrupt and out of business in a couple of years, as the competition can become better, the products in development don't end up working out, they ended up making bets that didn't work out, somebody else did something to make their product obsolete, or a combination of things. Also tech companies tend to not be very long lived if they make hardware, as hardware is both a fickle and difficult environment to be in, as they have a lot of physical inventory

and processes. The computer company that uses a logo that is a piece of fruit with piece bitten out of it, uses software to sell hardware and they actually haven't made their any of own hardware in over 20 years.

Most if not all of the successful chip makers now, actually only design the chips and off load the actually manufacturing to somebody else. One of the chip makers that actually makes the chips, the one that used to advertise with three blue colored men, is actually subcontracting out some of it's chip manufacturing to somebody who actually specializes in making chips as the one doing the contracting is having problems with their newest process. Also there is no point in building more fabs here, as most of the chips have to be exported to be used, as most of the plants that put chips into assemblies are overseas, which is more expensive and takes more time than making the chips close to where the devices that use them are assembled. The devices also aren't generally conducive to being assembled without the chips in them, so you can't ship them and install the chips here. Also the products made in factories sited because of government encouragement and subsidies, tend to be garbage quality. There's a reason why that nobody else has tried to build cars in New Brunswick, Canada or in Northern Ireland again, as the cars built there weren't all that good, quality wise. The products of Volkswagen plant in Pennsylvania were considered to be not as good as the ones from Germany. And the MBTA has had a lot of problems with subway cars assembled in the Quincy, Massachusetts plant, that was located in Massachusetts, because somebody wanted subway cars assembled in Massachusetts.

Also the political climate can change rapidly. Five people can be president over a 20 year span. That means that major changes in policy and how other countries view us, are possible. Also both the County Executive and Governor could be dead, out of power, or something in between, in 20 years. For that matter the County Executive could have a stroke that could either incapacitate or kill him tomorrow, as he has had a mini-stroke before and probably isn't in the best of health. The next person might not be supportive of the Micron project.

In 20 years the reason to build a fab here could go away for one reason or another. It's possible that in 20 years that the People's Republic of China either implodes or gets peaceably gets taken over by Taiwan, like how West Germany took over East Germany in 1990, something that would end the need for more fabs here, as the People's Republic of China is no longer a threat. Also tariffs could make using chips made here even more expensive, because they could incur tariffs in both directions, because they would be exported as chips and imported in finished devices. Also in 20 years countries might not be willing to deal with us anymore, because we still have problems with civil rights and decide to both boycott and embargo the US in a way that makes what Apartheid South Africa faced look like free trade. The US needs the rest of the world, more than the rest of the world needs the US.

I'm also against it for both military strategy and national security reasons. For one it would be a nice juicy target for aerial bombardment and long-range, missile attacks by any enemies with the capability who are at war with us, as it's planned to be big, important, and the site can be located on any Syracuse road map with Burnet Rd in Clay on it. It would be easily to take out or at least severely damage it, by simply bombing the area around where Burnet Rd is on the map, as you're bound to hit something vital at some point. Even if the situation is only a cyberwar and not a kinetic one, it's still a nice juicy target for a cyberattack, as it would be easy to cause a lot of damage to production and maybe even to the facility itself because being so big, a small network or personnel compromise could be leveraged to actually attack a lot of production equipment. A successful social engineering or cyber attack would have really big rewards for a adversary, as it would cripple a large amount of chip manufacturing capacity. Also it's being built on a wetland and an area with a high water table, which means the possibility of soil liquefaction exists, which can be induced by an explosion. Also

that means that the soil is probably very soft and may not actually be able to support the weight of the fabs, which would mean that the project would be a colossally expensive mistake, as they would sink and possibly not sink level. Soft ground can't support a lot of weight, which is why heavy things sink in it. All the dirt they want to bring in, probably will end up getting saturated and being made useless. Also where are they going to get all of that dirt from, as it's soil and not the stuff used to get leverage over someone.

Also if National Grid is going to install smart metering, somebody at National Grid could turn off the power accidentally or accidentally on purpose, which would ruin a lot of production. Somebody might turn off the power because they want to reduce the load on the grid and not realizing what they are turning off the power to, or they want to sabotage production. A hacker or cyberwarrior could also get into National Grids systems and do the same thing, possibly to a wider area as well.

I'm also against it because it will use way too much electricity and will ruin our quality of life. The governor is trying to reduce the state's carbon emissions, which this facility is going to increase if built. One of the things she is doing to achieve that goal, is by replacing fossil fuels with electricity. That is going to increase the demand for electricity by a very large amount, as a heat pump is an air conditioner that can also operate normally in reverse, to take in heat from outside. The heating elements inside of the air handler of ducted heat pump systems, also take quite a bit of power. It also take quite a bit of power to charge all of the electric vehicles in a reasonable amount of time, or at all in some cases. The average house may end up needing a 300 amp service to handle all of those loads. That size of service is not all that common even now. This means that we probably can't handle both all of those demands and Micron, because there won't be enough generation and distribution capacity. And people will revolt if only Micron and the local elites can get electricity, as they didn't sign up for an Authoritarian state. I don't see National Grid beefing up the distribution infrastructure or increasing generation capacity, as they are surprisingly encouraging energy conservation. It's probably cheaper to do that, than to actually make upgrades. Micron will probably cause electricity prices to skyrocket, as they will use a lot of electricity and not pay for any upgrades. Micron will also mean that power outages will become more frequent, as National Grid's priority will be to keep Micron supplied with power, at the expensive of everybody else. That also means that natural gas service may end up getting interrupted because at least some compressor stations are electric, and that grid-tied solar systems without battery backup won't work.

Also they probably aren't going to hire any local people even if they say they will, which means the population will skyrocket which will strain local services and infrastructure, and make the Syracuse area an awful place to live. The Syracuse area can't deal with anymore garbage that it supplies now, and they apparently don't have any contingency plans for when the incinerator breaks down. People were actually panicking when it broke down the first time, and that place is beyond it's design life anyway and apparently they don't stock more than one of any given spare part. What happens if they end up breaking something that they don't have more of, and that part has a six month lead time. We might not be able to supply enough water and sewer capacity for everybody and Micron. You might be able to kick the sewer capacity problem down the road for 4 years, depending on how many septic systems are installed and how big they are, but the water problem would be immediate.

They also say that it will create "up to" jobs and not a fixed number of jobs, which means they could hire either nobody, or only 4 security persons to watch the site after they have abandoned it, and technically keep their promise. The phrase "up to" is a scary thing in this kind of thing, as it's easy for them to weasel out of it and still keep all of the government benefits that they received. It's like when they use "up to" in the reward for the apprehension of a criminal. The only way that they are going to pay out the full reward, is if you bring them in yourself and are shrewd negotiator. They are going to try to do anything to get out of paying the reward.

Personally if I was in charge of Micron, I wouldn't build the fab as it's a very poor use of company money. It would be better to abandon the project now and take a small hit to the price of the stock, or even possibly a boost to the price of the stock, then end up tanking the stock and the quarterly report because you essentially flushed a ton of money down the drain. There are way too many unknowns for spending money on this to be a sensible thing to do. This project is going to be like playing Jenga in bed or in a moving vehicle, as you don't know what's going to bring the whole thing crashing down, or when it's going to happen.

I don't know if anybody will even read this, or any comment on this project as they don't care about what the constituents want. They only care about who is lining their pockets. Now you may think that I'm cynic for thinking that, but a cynic is what an idealist calls a realist. I've heard rumors that say that the Onondaga County Executive takes kickbacks. That is true, one way or the other. I bet if you did a through investigation of most politicians, you would find that they have unexplained income or income that they don't want to tell you where it comes from, as it would incriminate them.

It's almost like we live in an Authoritarian state already, as stuff that the people don't like gets shoved down their throats. It's not their jobs are all that important anyway. If it all hit the fan, most of them would be useless in the situation anyway, as they don't know how to do anything. The jobs of garbage people, and the people who keep the water supply and sewer systems working, have jobs that are way more important than the jobs of the politicians. When the politicians stop working correctly nothing really changes, but when garbage people go on strike, it can bring a city to it's knees, both literally and metaphorically. A non-functional water supply or sewer system can cause major problems too, as a modern city can't function well without both. As long as everything gets funded, you really don't need politicians, because things can be setup to fund operations and the repairs and replacements of infrastructure automatically. Nothing has really changed much since the 1950s or 1960s anyway, so it's not like the politicians are actually doing anything useful. It's no wonder why people vote for the Authoritarian, since democracy doesn't appear to behave any differently, if we get stuff shoved down our throats anyway. Since the County Executive is an R-Word anyway, he feels that he has carte blanche to be an Authoritarian, since the orange man in the white house is one, or at least acts like one.

If this project goes through, it will ruin the lives of the people who live in the Syracuse area. The cons outweigh the pros, so it would be best for all involved to abandon the project before starting. It would a massive environmental disaster and a massive waste of money for no benefit, so why even bother doing it. Everybody involved in starting the project may actually be out of office or dead in 20 years, but the environmental damage and the reduced quality of life would be permanent. The environment and quality of life is a lot more important than money and jobs that probably won't actually come. When it comes to projects like this in this day and age, you can't trust corporations to hold up their end of the bargain.

Robert Peters

From: John Przepiora <john@greeningusa.org>
Sent: Thursday, July 10, 2025 11:53 AM
To: chipsnepa
Cc: Robert Petrovich; PHogan@syr.gov.net
Subject: [EXTERNAL] MICRON Draft EIS 2025 Comments

Date: July 10, 2025
To: OCIDA and US Department of Commerce
From: John Przepiora, Syracuse, NY
Re: MICRON DRAFT EIS 2025 COMMENTS

ATTN: Micron Project

The deadline for submitting comments on the just released DEIS for the Micron, Clay, NY project is too soon to allow sufficient and effective public input. I am requesting a 120 day (4 months) public comment period be established. The DEIS is 719 pages plus 19 thousand pages as appendices. It is difficult for me, and I presume the public in general, to easily understand even one section without hours of study. In the time available I will not have adequate time to read the complete document; even trying to make sense of limited portions is challenging in the short time frame that is offered. It is outrageous that Micron, OCIDA and the CPO had upwards of two years to prepare this material and the public is given just a fraction of that time for its review. Further, based on my reading of portions to date, the document is written in such a manner that makes comprehending the environmental, social and economic impacts difficult. We have construction phase impacts that will span 16 or more years, we have operational phase impacts which overlap construction impacts; and then there are growth induced impacts and cumulative impacts which from my reading so far are simplistically dismissed as being short term and not to be concerned over, that all will work out in time. Wading through this overlapping, twisted story will take more than 48 days for even the most intelligent and experienced planning and development expert.

The allowed 48 day review period from June 25 to August 11 is a period which includes just 34 'business' days and 14 weekend days during the summer season when many Onondaga County residents are on summer vacation and out of town, making it virtually impossible for them to participate in this important DEIS review. I am requesting 75 additional days—just over 10 weeks additional time to October 23. Estimating that Micron, OCIDA, and DOC would require three additional months to review comments, respond, revise and issue the final EIS, plus allowing time for involved agencies to issue appropriate permits, it is conceivable that

construction could begin by late January or early February of 2026. An additional 75 days for public review will not significantly impact this project, which has a 20 year estimated buildout and potentially a 100 year lifetime. An additional 75 days may even help to improve the project and avoid potential negative impacts which otherwise may put our community at risk.

OCIDA and US DOC have been working on the Micron DEIS for over two years. And while I understand the eagerness to move forward quickly and without public controversy, disregard for the public's valid participation in a meaningful way is untenable and potentially dangerous. Cutting the review process short disregards the public's right and responsibility to give informed input on something that will affect my future and the future of generations to come.

This is not a simple project. It will be transformative for CNY. It includes several major components (water system, wastewater systems, significant population growth, massive energy consumption and GHG emissions, to mention a few), each of which deserves public scrutiny of 30 to 45 days. Lumped together, and with the overlapping multi-phase impacts, this project and this DEIS deserve additional time for public input beyond 48 days.

Respectfully,

John Przepiora
President & Director
GreeningUSA, Inc.
(315) 382-3829
GreeningUSA.org



From: judyfero@twcny.rr.com
Sent: Friday, July 11, 2025 8:15 AM
To: 'CHIPSNEPA@chips.gov'
Subject: [EXTERNAL] MICRON - HOW ARE YOU GOING TO KEEP PFA's OUT OF OUR WATER

Onondaga County Industrial Development Agency,

How can you, in good conscience, proceed with this MICRON project that will pollute and release toxic "forever" chemicals into our treasured water source?

Wasn't the demise of Onondaga Lake enough of lesson to understand the impact of industrial pollution that continues to impact generations of Onondaga County residents?

Perhaps if you and your loved ones were forced to drink and bathe in Micron's wastewater you would have a different perspective than sheer greed.

More time is needed to review the environmental impacts (specifically water integrity).

Do what is right!!

Judy Fero

From: Don Hughes <dhughes171@gmail.com>
Sent: Friday, July 11, 2025 3:16 PM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Comments on EIS No. 20250091, Draft, DOC, NY, Micron Semiconductor Manufacturing Facility, Clay, NY, Comment Period Ends: 08/11/2025, Contact: David Frenkel 240-204-1960.

Regarding: EIS No. 20250091, Draft, DOC, NY, Micron Semiconductor Manufacturing Facility, Clay, NY. The public comment period of 45 days is insufficient. Under NEPA, the public must be provided an opportunity for **meaningful participation through the comment process**. See Florida Power & Light Co. v. United States, 846 F.2d 765, 771 (D.C.Cir.1988). Fortyfive days to review a 20,000-page document which is dense with technical language clearly does not fulfill this standard. I therefore request that the public comment period be extended to October 31, 2025.

I reserve my right to make additional comments on this huge project.

respectfully,

Donald J. Hughes, Ph.D.

dhughes171@gmail.com

315.214.4060 (landline)

=====

Hughes Environmental Consulting
157 Strong Ave,
Syracuse, NY 13210

=====

"dans les champs de l'observation, le hasard ne favorise que les esprits préparés" ("In the field of observation, chance favors only the prepared mind") **Louis Pasteur**, French chemist and microbiologist (1822 - 1895)

From: Amy Kallander <akalland@syr.edu>
Sent: Friday, July 11, 2025 12:29 PM
To: chipsnepa
Subject: [EXTERNAL] public comment on Micron

Good afternoon,

I am concerned about the environmental and economic impact of Micron on the Central New York community where I have lived for close to 20 years.

45 days is not enough time for public comment. Please extend this to 120 days for our communities to review the Micron DEIS document, and allow for 5 public hearings for comment on the proposed plan.

Sincerely,
Amy Kallander

From: Jose Mera <jose.mera1016@gmail.com>
Sent: Friday, July 11, 2025 2:57 PM
To: Chipsnepa@chips.gov
Subject: [EXTERNAL] EIS No. 20250091 comments

1. Please consider putting sound barriers on new 4 lane road between state road 481 and the Micron plant Caughdenoy Rd. entrance. There are housing developments to the north and south of this new road, between Maple Rd. and state route 31.

2. With expected additional traffic on state road 481 northbound, with new exit to 4 lane road, please consider adding sound barriers on 481 northbound between route 11 and new exit.

Jose Mera
8210 Justin Drive
Clay, NY 13041

From: Eva Shanley <eshanley9@gmail.com>
Sent: Saturday, July 12, 2025 2:51 PM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Micron

I am requesting AT LEAST 120 days for our communities to review the Micron DEIS document, and allow for 5 public hearings for comment on the proposed plan. Micron has had lots of time to prepare for this, now we deserve some time to respond.

From: Jane Slabowski <jslabowski@aol.com>
Sent: Saturday, July 12, 2025 7:43 AM
To: chipsnepa
Subject: [EXTERNAL] More time

Good Morning-

For a project of this enormity, more time is needed for review. Simple as that.

Jane Slabowski
13210

WARNING! IMPERIALISM AT WORK ^{THE CW} ROCHESTER NY 144

Ron Cala ©2010

For the sake of our children, progressives need to pressure President

Obama into changing US "might-is-right" foreign policy. 12 JUL 2025 PM 2 L



Dear Whom it May Concern, Microns arrival to CNY is not what the people want, and will not bring economic prosperity as proposed. Microns arrival will significantly back up traffic something CNYers are already fed up with the reconstruction of 81. Not to mention the surge in air and noise pollution, destruction of local wildlife and the consumption of public water sources. Plus the project will take years to be completed,

Oranoga County Industrial Development Agency
ATTN: Micron Project
335 Montgomery St Floor 2m
Syracuse, NY 13202

www.SyracuseCulturalWorkers.com 800.949.5139

Printed by unions labor in USA on 100% postconsumer waste (PCW) recycled stock; processed chlorine free, no dioxin, 9/10

13202 200605

taking longer to achieve a profit, ~~downright~~ ~~to~~ ~~in~~ ~~the~~ ~~end~~ ~~of~~ ~~the~~ ~~road~~
with this project. - Your constituent Syd Kellogg

WARNING!



IMPERIALISM AT WORK

LAW OFFICE OF JOSEPH J. HEATH
GENERAL COUNSEL FOR THE ONONDAGA NATION
512 JAMESVILLE AVENUE
SYRACUSE, NEW YORK 13210-1502

July 14, 2025

Onondaga County Industrial Development Agency
335 Montgomery Street, 2d Floor
Syracuse, NY 13202
Attn: Micron Project Staff

David Frenkel and Holly DeJong
Department of Commerce/Office of CHIPS
CHIPSNEPA@chips.gov

Re: Request for Extension of Public Comment Period for Micron Project

Dear OCIDA and CHIPS Staff:

On behalf of the Onondaga Nation, I am submitting this request for an extension of the public comment period on the Draft Environmental Impact Statement (DEIS) issued for the Micron project. The DEIS was issued on June 26, 2025 for a 45-day public comment period ending on August 11, 2024. However, for a project of this complexity, the federal minimum of 45 days for public comment is far too short. The Nation supports the community request for a 120-day public comment period to allow for meaningful public engagement. This would extend the date for public comments to October 22, 2025.

The Micron DEIS is being issued to satisfy obligations under the New York State Environmental Quality Review Act (SEQRA) and the federal National Environmental Policy Act (NEPA). Both laws require that the public have the opportunity for meaningful and effective engagement with the DEIS. See *Friends of P.S. 163, Inc. v. Jewish Home Lifecare, Manhattan*, 30 N.Y.3d 416, 426 (2017) (finding that “public participation and engagement is an essential and mandatory part of the SEQRA process”); *Brodsky v. US Nuclear Regulatory Commission*, 704 F.3d 113, 120 (2d Cir.) (identifying “public scrutiny” as an essential component of NEPA’s environmental review process).

The Micron DEIS contains almost 700 pages of analysis in the narrative section alone, which is more than twice the maximum length established by the Fiscal Responsibility Act of 2023 for a NEPA DEIS, 42 U.S.C. §4336a(e)(1), and presumed to

be reviewable in 45 days. The document relies on over 19,000 pages of technical appendices to explain its assessment. To fully understand the scope of review already conducted, the environmental impacts identified, and any gaps in that review or additional information that should be considered, the public must scrutinize thousands of pages of complex narrative and technical analysis. Simply reading this enormous document may take more than the minimal 45 days allotted for many reviewers.

Public scrutiny is particularly important in this case, given the profound, long-term, and wide-ranging impacts that the Micron project is expected to have. Micron will consume all of the current excess electricity production capacity in the region. The construction process with its attendant traffic, noise, and dust will continue for 16 years. The final project is expected to draw thousands of workers to the area, changing traffic and housing patterns across several neighboring villages, towns, and cities. The Micron Campus alone will destroy or disturb hundreds of acres of wetlands, disrupt existing surface and groundwater flows, generate enough greenhouse gases to interfere with state-wide climate goals, and produce enormous volumes of waste. As a result, Onondaga County will be required to build a new industrial wastewater treatment plant. These impacts will be felt throughout the region.

Extensions of the public comment period are routinely granted for comparable projects. For example, for the I-81 Viaduct Project, the Federal Highway Administration and the New York Department of Transportation initially provided a 60-day review for its DEIS. This was extended to 90 days based on public requests. While the I-81 DEIS was comparable in length, project impacts weren't nearly as wide-ranging as those generated by Micron.

The affected public deserves a meaningful opportunity to learn about the project, review its impacts, and provide input to ensure the careful and complete environmental review that this project requires. For these reasons, the Nation supports an extended public comment period of 120 day and multiple public hearings at locations across the affected area.

Sincerely,

A handwritten signature in black ink, appearing to read "Alma L. Lowry". The signature is fluid and cursive, with a long horizontal flourish at the end.

Alma L. Lowry, Of Counsel

cc: Council of Chiefs, Onondaga Nation
Joseph Heath, General Counsel/Onondaga Nation
Jeanne Shenandoah, Onondaga Nation
Hazel Powless, HETF/Onondaga Nation

From: serena becker <serenabecker@gmail.com>
Sent: Tuesday, July 15, 2025 4:39 PM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Micron

Please allow for time for comment of the very lengthy environmental impact statement related to Micron. This project is essentially the building of a mini-city. The public deserves more time to understand the environmental impacts that will come from such a project.

Thank you,

Serena

From: Erin K Beiter <ebeiter@syr.edu>
Sent: Tuesday, July 15, 2025 12:12 PM
To: chipsnepa
Subject: [EXTERNAL] Public Review of DEIS

Hello,

As a member of the public, I am requesting that we be given at least 120 days to review this environmental impact statement and more public hearings to comment on the proposed plan. Thank you.

Erin Beiter
They/them/theirs
107 College Place
Senior Laboratory Technician
LAR

Office of Research
Syracuse University

From: Richard Buttny <rbuttny@syr.edu>
Sent: Tuesday, July 15, 2025 12:19 PM
To: chipsnepa
Subject: [EXTERNAL] DEIS

Greetings,

More time is needed than the 45 days allotted to read the DEIS for Micron. Let's do this right.

Regards,
Richard Buttny
Cortland, NY

From: Kristin Onderdonk <konderdonk3@gmail.com>
Sent: Tuesday, July 15, 2025 3:08 PM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Request for Environmental Accountability and Community Review – Micron Project

Dear CHIP CNY Team,

As a lifelong Central New York resident—born in Solway and now living in Baldwinsville—I am writing to express serious concerns about the potential environmental impact of the proposed Micron industrial project.

My family and I deeply value the natural beauty, clean water, and abundant wildlife that define our region. The lakes, rivers, land, and ecosystems of Upstate New York are irreplaceable, and they must be protected for the health and wellbeing of both current and future generations.

We respectfully urge you to:

- Hold Micron fully accountable to the highest environmental and community standards.
- Ensure that the DEIS (Draft Environmental Impact Statement) review period is extended to at least 120 days, so that community members, scientists, and advocates have time to review and respond thoughtfully.
- Schedule a minimum of 5 public hearings, distributed across impacted communities, to allow for diverse voices and concerns to be heard and recorded.

This project will shape the future of our region. It is vital that we proceed with integrity, caution, and community engagement—not just corporate ambition.

Thank you for your attention to this matter and for ensuring that local voices are honored in this process.

Sincerely,

Kristin and Don Onderdonk

3133 Corlear Dr, Baldwinsville, NY 13027

"TOGETHER WE ARE SO MUCH MORE!" x.o., K.O.

Kristin Onderdonk, www.enjoychi.com

konderdonk3@gmail.com

Order your copy of [STOP & FLOW, 8 Steps to Recharge Your Life](#) today.

Thank you for leaving your 5 Star Amazon Book Review [here](#).

From: Hanna Walier <hwalier@citizenscampaign.org>
Sent: Tuesday, July 15, 2025 4:45 PM
To: CHIPSNEPA@chips.gov
Cc: Adrienne Esposito; Brian Smith
Subject: [EXTERNAL] Micron Public Comment Period Extension
Attachments: Request to Extend Micron DEIS Public Comment Period.pdf

Good afternoon,

Please find the attached request from Citizens Campaign for the Environment (CCE) to extend the current 45 day Micron DEIS comment period to ***a minimum of 90 days and schedule at least 3 public hearings.***

Thank you for your consideration.

Sincerely,



Hanna Walier
CNY Program Coordinator
Citizens Campaign for the Environment
Phone: 315-558-4974
www.citizenscampaign.org



Virus-free. www.avast.com



July 15, 2025

Onondaga County Industrial Development Agency
ATTN: Micron Project
335 Montgomery Street, Floor 2M
Syracuse, New York 13202
CHIPSNEPA@chips.gov

RE: Request to Extend Public Comment Period and Increase Public Hearings for Micron Draft Environmental Impact Statement

On behalf of Citizens Campaign for the Environment (CCE) and our 120,000 members across New York State, we respectfully request that the Onondaga County Industrial Development Agency (OCIDA) extend the public comment period for the Draft Environmental Impact Statement (DEIS) for the proposed Micron semiconductor facility from the current 45 days to a **minimum of 90 days and schedule at least 3 public hearings**. This proposed comment period and single public hearing is extraordinarily short for a project of this unprecedented scale, complexity, and potential impact on the Central New York region's environment, infrastructure, and communities.

The Micron project is expected to bring profound changes to land use, water resources, energy demand, air quality, traffic, and the surrounding communities. A 45-day comment window does not offer residents, organizations, experts, and stakeholder sufficient time to thoroughly review the thousands of pages of documentation and offer informed, substantive input. For a project of this magnitude, the public must be given a meaningful opportunity to participate in the environmental review process.

In addition to extending the comment period, CCE urges OCIDA to hold at least three public hearings on separate days and in different locations across the affected area. Holding a single public hearing on one day is simply inadequate and risks excluding many concerned residents who deserve to be heard. Multiple hearings will ensure more equitable access, allow working families and other stakeholders to participate, and promote greater transparency.

OCIDA has a responsibility to ensure this process is not merely procedural, but truly participatory. The legitimacy of the environmental review, and the public trust in its outcomes, hinges on the integrity, accessibility, and transparency of the public engagement process. Rushing public input for one of the largest industrial projects in New York State history sends the wrong message to the communities who will be living with the consequences.

An extended comment period and multiple public hearings are not only reasonable, but they are also essential to uphold the standards of public accountability, environmental justice, and responsible development.

Thank you for your consideration of this urgent request. **CCE respectfully asks that you take immediate action to extend the DEIS comment period to at least 90 days and schedule at least three public hearings to ensure full and fair public engagement.**

Sincerely,

Hanna Walier

Hanna Walier
CNY Program Coordinator

From: Kari Calenzo <kari.calenzo@gmail.com>
Sent: Tuesday, July 15, 2025 4:39 PM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Public Comments

Hello,

My name is Kari Calenzo and I live in Baldwinsville, NY (an area that will be directly impacted by Micron's construction).

Im reaching out to request AT LEAST 120 days for our communities to review the Micron DEIS document, and allow for 5 public hearings for comment on the proposed plan.

The public deserves and opportunity to absorb the information in the DEIS document and comment on it when this could have generational environmental impacts.

Thank you,
Kari Calenzo

From: Mary Moriarty Burgess <moriartyburgess@gmail.com>
Sent: Thursday, July 17, 2025 11:11 AM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Downstream Flooding Risk

Micron,

Please be a good neighbor and fully evaluate and mitigate flooding risks. You cannot replace 200 acres of wetlands and 8,000 feet of streams with 645 acres of impervious surfaces (parking lots, roads, roofs) and 58 acres of semi-impervious surfaces without severely impacting the downstream area. There is already a problem with sump pumps and basements and the Micron project will only exacerbate the matter.

I live on Oneida Lake and believe your pollution will damage the river that feeds the lake, posing a serious threat to the fish and birds that are part of the environment.

How will your millions of gallons of required water not impact the sources you intend to draw from? And how will your toxic waste be neutralized before being released back into the environment?

Jobs are important, but preserving our living space and the gifts of beauty and life that have been given to this area are MUCH more important.

Please clean up the plan. I won't suggest that you take it elsewhere, as the same issues will move with you wherever you go. Make it right please. Dollars aren't everything, and when the area is lost to shortsighted industry, it very likely is lost forever, long after Micron has made its money.

Thank you,

Mary Burgess

From: Evan Crocker <evan.t.crocker@gmail.com>
Sent: Thursday, July 17, 2025 2:03 PM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Micron impact on downstream floods

As a concerned resident in the town of Clay, I am writing to ask for consideration and clarity on flood mitigation in regards to the micron project. Wetlands and streams are planned to be filled by the hundreds of acres. This flood prone area will likely be at much higher risk of these disasters, specially downstream in Clay, Phoenix, Fulton, etc.

From my reading of the recently released environmental impact report, I do not see any coverage of this concern. It is clear the impact of flooding can do based on recent examples both near and far.

So again, I am asking for this concern to be addressed before it's too late.

Thank you for the time and consideration

Evan Crocker
Clay, NY resident

From: Leslie Noble <nobleladededa@gmail.com>
Sent: Thursday, July 17, 2025 7:44 PM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Micron DEIS

Hello,

I'm writing to urge the lead agencies to allow at least 120 days for our community to review the Micron Draft Environmental Impact Statement. It is an enormous document covering a wide variety of issues. The impact of this project is very important to our community and we need more time to read and comprehend the findings.

Respectfully,

Leslie Noble
Syracuse, NY

From: Trent Gardner <trent.gardner0614@gmail.com>
Sent: Friday, July 18, 2025 2:44 PM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Micron Clay Plant Environmental Impact Statement Question

To Whom it May Concern,

The EIS highlights many socioeconomic concerns, such as affordable housing risks, a strain on public services and infrastructure, equity and environmental justice questions, major air and water quality issues, and other alarms. With Mayor Walsh recently announcing over \$10 million in budget cuts for 2026, what is being done currently to help the disparaged communities that are suffering in the current climate to ensure these communities are not lost into a state of crisis?

Sincerely,
Trent Gardner

From: Bjorness, Joan E (DOT) <Joan.Bjorness@dot.ny.gov>
Sent: Friday, July 18, 2025 11:17 AM
To: CHIPSNEPA@chips.gov
Cc: Baldwin, Julie A. (DOT)
Subject: [EXTERNAL] NYSDOT Response - MICRON DEIS
Attachments: NYSDOT DEIS Response - Micron 7.2025.pdf

Good morning,

On behalf of Julie Baldwin, Senior Transportation Analyst, attached is New York State Department of Transportation's letter of receipt of the Micron Draft Environmental Impact Statement. Should you have any further questions, please contact Julie Baldwin, Julie.baldwin@dot.ny.gov or 315-428-4408.

Thank you,

Joan Bjorness

JOAN BJORNESS

Program Aide I
Planning and Program Management Group

New York State Department of Transportation

333 E. Washington Street, Syracuse, NY 13202
315-428-4102 | joan.bjorness@dot.ny.gov
dot.ny.gov

From: anthonyj <anthonypoletto@gmail.com>
Sent: Friday, July 18, 2025 8:54 AM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Micron

Go FUCK yourselves Micron

Give us AT LEAST 120 days to review your bullshit DEIS document , then please go fuck yourselves

Never come to CNY ever

Sent from my iPhone

From: Lisa Saka <lisacsaka@gmail.com>
Sent: Friday, July 18, 2025 9:39 AM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Micron/Syracuse

I am a resident of the city of Syracuse in Onondaga County, NY.

I stand with many others as I request additional time to understand and comment on the environmental impact of. The region. It has been difficult for me to obtain information and what I have read is very concerning. There should be no way that industry of this magnitude be permitted to deposit any waste into our environment, our streams, water ways.

Everyone needs more time to fully grasp and debate Microns long term impact. At the very least, the contamination of Onondaga Lake demands additional thought around destructive industry in this area.

Lisa Saka
Resident, 13208

Katie Turner

4188 Rigel Course
Liverpool, NY 13090
KatieTurnerArt@gmail.com

July 18, 2025

Onondaga County Industrial Development Agency
Attn: Micron Project
335 Montgomery Street, Floor 2M
Syracuse, NY 13202

Dear OCIDA,

I am writing to you concerning the issues surrounding Micron's plant coming to Clay. As a resident within just miles of the location, I am very concerned for my family's and neighbors health and impact upon us by this massive project.

Micron will impact our health, safety, socioeconomic and environmental lives of each of us. Please extend the time for us to review this massive project and reports.

I would also like to ask that you have Micron take on the responsibility of spills - not our Onondaga County sewer system. It shouldn't fall on the taxpayers. These types of plants are prone to accidents and I see no plan for when this happens. It's completely foolish to not plan for that. Will OCIDA be ready, willing and able financially and otherwise handle such an incident? Will OCIDA be responsible for turning Town of Clay into the next Brownfield site similar to Solvay? Where is the plan concerning this? I would like to request that OCIDA give the responsibility back to Micron and have them fund a comprehensive plan to save Town of Clay from becoming the next Brownfield site on the map.

I would like to see Micron go above and beyond what is "by-law" and do much more to restore our environment and habitat for the wildlife. Not just paying money into a fund but doing actually local restoration.

I would like to see Micron funding Town of Clay, Onondaga County energy and clean water to keep our community from suffering from lack and increased costs. Micron will be making a LOT of money over the years from our limited precious resources of

water, air and land. The very LEAST they could do is help the local communities by removing the high costs we will be experiencing.

I would like to see some kind of independent test (funded by Micron) that on a weekly or daily basis tests our water, air and soil for the levels of toxic chemicals which Micron will be using, that are so very common to that industry. Similarly, have Micron fund local cancer treatment centers for those of us who will suffer from their toxic sludge and chemicals, so care will be low or no cost.

There are more things we can ask of Micron but I see the rushing by OCIDA and the limiting input from the public with shortened review times as problematic.

Please take my concerns into consideration.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'K Turner', with a stylized flourish at the end.

Katie Turner

Ralph Turner

4188 Rigel Course
Liverpool, NY 13090
Ralph.Turner.rt@gmail.com

July 18, 2025

Onondaga County Industrial Development Agency
Attn: Micron Project
335 Montgomery Street, Floor 2M
Syracuse, NY 13202

Dear OCIDA,

I am writing to you concerning the issues surrounding Micron's plant coming to Clay. As a resident within just miles of the location, I am very concerned for my family's and neighbors health and impact upon us by this massive project.

Micron will impact our health, safety, socioeconomic and environmental lives of each of us. Please extend the time for us to review this massive project and reports.

I would also like to ask that you have Micron take on the responsibility of spills - not our Onondaga County sewer system. It shouldn't fall on the taxpayers. These types of plants are prone to accidents and I see no plan for when this happens. It's completely foolish to not plan for that. Will OCIDA be ready, willing and able financially and otherwise handle such an incident? Will OCIDA be responsible for turning Town of Clay into the next Brownfield site similar to Solvay? Where is the plan concerning this? I would like to request that OCIDA give the responsibility back to Micron and have them fund a comprehensive plan to save Town of Clay from becoming the next Brownfield site on the map.

I would like to see Micron go above and beyond what is "by-law" and do much more to restore our environment and habitat for the wildlife. Not just paying money into a fund but doing actually local restoration.

I would like to see Micron funding Town of Clay, Onondaga County energy and clean water to keep our community from suffering from lack and increased costs. Micron will be making a LOT of money over the years from our limited precious resources of

water, air and land. The very LEAST they could do is help the local communities by removing the high costs we will be experiencing.

I would like to see some kind of independent test (funded by Micron) that on a weekly or daily basis tests our water, air and soil for the levels of toxic chemicals which Micron will be using, that are so very common to that industry. Similarly, have Micron fund local cancer treatment centers for those of us who will suffer from their toxic sludge and chemicals, so care will be low or no cost.

There are more things we can ask of Micron but I see the rushing by OCIDA and the limiting input from the public with shortened review times as problematic.

Please take my concerns into consideration.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Ralph Turner', written in a cursive style.

Ralph Turner

From: Jim Donaldson <jamesd436@yahoo.com>
Sent: Saturday, July 19, 2025 7:32 PM
To: chipsnepa
Subject: [EXTERNAL] MICRON LOCATION

Someone justify to me why a wetlands was chosen as the site. Unless I'm missing something, this seems like another decision designed to destroy even the surrounding ecosystem.

Jim Donaldson
Syracuse

From: Katie Turner <katieturnerart@gmail.com>
Sent: Sunday, July 20, 2025 4:02 PM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Resident Comments Micron

Dear OCIDA,

I am writing to you concerning the issues surrounding Micron's plant coming to Clay. As a resident within just miles of the location, I am very concerned for my family's and neighbors health and impact upon us by this massive project.

Micron will impact our health, safety, socioeconomic and environmental lives of each of us. Please extend the time for us to review this massive project and reports.

I would also like to ask that you have Micron take on the responsibility of spills - not our Onondaga County sewer system. It shouldn't fall on the taxpayers. These types of plants are prone to accidents and I see no plan for when this happens. It's completely foolish to not plan for that. Will OCIDA be ready, willing and able financially and otherwise handle such an incident? Will OCIDA be responsible for turning Town of Clay into the next Brownfield site similar to Solvay? Where is the plan concerning this? I would like to request that OCIDA give the responsibility back to Micron and have them fund a comprehensive plan to save Town of Clay from becoming the next Brownfield site on the map.

I would like to see Micron go above and beyond what is "by-law" and do much more to restore our environment and habitat for the wildlife. Not just paying money into a fund but doing actually local restoration.

I would like to see Micron funding Town of Clay, Onondaga County energy and clean water to keep our community from suffering from lack and increased costs. Micron will be making a LOT of money over the years from our limited precious resources of water, air and land. The very LEAST they could do is help the local communities by removing the high costs we will be experiencing.

I would like to see some kind of independent test (funded by Micron) that on a weekly or daily basis tests our water, air and soil for the levels of toxic chemicals which Micron will be using, that are so very common to that industry. Similarly, have Micron fund local cancer treatment centers for those of us who will suffer from their toxic sludge and chemicals, so care will be low or no cost.

There are more things we can ask of Micron but I see the rushing by OCIDA and the limiting input from the public with shortened review times as problematic.

Please take my concerns into consideration.

Sincerely yours,

Katie Turner

Liverpool, NY 13090

From: Demetra Vounas <deevounas@yahoo.com>
Sent: Sunday, July 20, 2025 2:25 PM
To: chipsnepa
Subject: [EXTERNAL] Micron

45 days is not enough time for the public to review an extremely complicated environmental review.
Please extend the review period to 120 days.

I am most concerned about the denigration of wetlands and the water requirements that the Micron project requires.

Thank you.

Demetra Vounas
Skaneateles NY

From: Marisa Barber <marbarber13@gmail.com>
Sent: Monday, July 21, 2025 3:27 PM
To: chipsnepa@chips.gov
Subject: [EXTERNAL] Extend Micron DEIS Comment Period

The public needs at least a 120 day comment period to review the Micron DEIS. 45 days is not enough time to review and leave a comment on a DEIS for such a large project. The 45 day comment period prevents meaningful participation from the public.

From: kmgillphd <kmgillphd@aol.com>
Sent: Monday, July 21, 2025 12:05 PM
To: chipsnepa
Subject: [EXTERNAL] Micron project in Central NY

I am a New York State resident and I support the following:

SustainCNY is requesting a **minimum of 120 days for public review and comment**. Furthermore, we request that the US Department Of Commerce and the Onondaga County Industrial Development Authority (OCIDA) **convene a minimum of five public hearings** to be held at various locations throughout central New York, including Syracuse, Clay, and Oswego. All of this is needed to explain or offset existing questions:

How are the 'Forever' chemicals (PFAS) used in manufacturing process going to be handled?

How is the water demand going to be supplied?

How is the energy required going to impact all of us?

We already have a housing crisis.... Is there a reasonable plan that doesn't put this even more out of reach for our citizens?

Kathleen M. Gill, Ph.D.
76 Greenwood Park
Pittsford, NY 14534

July 21, 2025

Onondaga County Industrial Development Agency
ATTN: Micron Project
335 Montgomery Street, Floor 2M
Syracuse, New York 13202

Re: Micron Semiconductor Manufacturing Project, Clay, NY Draft Environmental Impact Statement EISX-006-55-CPO-001

Dear Ladies & Gentlemen:

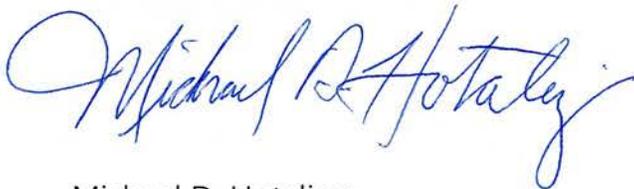
C&S Companies supports the Micron Semiconductor Manufacturing Project and the meaningful long-term impact it will deliver for Central New York.

We applaud Micron's commitment to invest in Onondaga County where C&S was founded in 1968. The Semiconductor Manufacturing Project will improve the livelihood of thousands as it develops and drives other sectors of the local economy.

The County's bold vision to attract this robust opportunity will reinvigorate not just the local economy but that of the State of New York and the nation. We look forward to the vibrant future that will unfold as this vision takes shape and our community thrives.

Sincerely,

C&S COMPANIES



Michael D. Hotaling
Chairman and CEO

From: Michelle Jevis <Michelle.Jevis@crfletcher.com>
Sent: Monday, July 21, 2025 4:17 PM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] MICRON EIS Draft comment

As a local staffing agency dedicated to supporting economic growth and workforce development in our community, CR Fletcher Temps and Industrial strongly supports the arrival of Micron to Central New York. We believe this investment will bring long-term benefits to our regional economy. CR Fletcher stands ready to celebrate the successful launch of Micron. We commend the efforts of all stakeholders involved, and we look forward to Micron's success and growth in our region.

Sincerely,

Michelle Jevis
President
CR Fletcher Temps and Industrial

Michelle Jevis, PHR

CR Fletcher

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From: Bud Loura <bud@restaurantqb.net>
Sent: Monday, July 21, 2025 1:50 PM
To: chipsnepa@chips.gov
Subject: [EXTERNAL] Support of Micron

I just wanted to send my support to the micron project.
I work directly with a local group of about 165 restaurant owners, the impact it will have on local businesses is lifesaving.
more jobs
more revenue
more tourism

appreciate what everyone involved has done
thanks

Bud Loura
315-751-3528
RestaurantQB

Get [Outlook for iOS](#)

From: Joanne Rauch <Joanne.Rauch@crfletcher.com>
Sent: Monday, July 21, 2025 4:16 PM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Comment on Micron EIS Draft

As a leading Executive Search firm in the CNY area for the last 35+ years, CR Fletcher Associates, Inc. fully supports the project and is excited about the opportunities that Micron will bring to the area. We look forward to the impact that Micron and other companies will have on developing the area into a place where people will want to work, live and visit.

Joanne Rauch

President

CR Fletcher Associates, Inc.

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Name: Margaret Cohee
Address: 314 Fellows Ave, Syracuse, NY 13210

Email: mcohee@hotmail.com
Date: 7/22/2025

CHIPS Program Office, National Institute of Standards and Technology, U.S. Department of Commerce,
CHIPSNEPA@chips.gov

Onondaga County Industrial Development Agency
ATTN: Micron Project
335 Montgomery Street, Floor 2M
Syracuse, New York 13202

RE: Draft Environmental Assessment EISX-006-55-CPO-001

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to **extend the comment period to October 25, 2025, at a minimum**, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

In particular I am concerned about: the many forever chemicals (PFASs) used in the production of microchips. MICRON should be transparent about which chemicals will be used and commit to their complete destruction before waste water enters the county water treatment system. I am also concerned about MICRON's impact on greenhouse gas emissions. Our area is currently an exporter of electrical power, but MICRON's energy needs will turn us into a net importer unless there is a plan and commitment to generate or purchase renewable energy without relying on renewable energy credits.

I also urge consideration and response to the following issues and concerns:

1. **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
2. **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
3. **Greenhouse Gases:** The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar –and without relying on renewable energy credits or using renewable energy that is already on the grid – to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.
4. **Affordable and abundant water and energy:** The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.
5. **Job Access, Housing & Transportation.** The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge

From: Dominic Gambaiani <dgambaiani97@gmail.com>
Sent: Tuesday, July 22, 2025 3:44 PM
To: chipsnepa@chips.gov
Subject: [EXTERNAL] Public comment for Micron Hearing

To whom it may concern:

I wish to add my suggestions for this major development project.

While Micron is a great job opportunity for Onondaga and surrounding counties, it behooves all agencies and local and county legislatures to ensure that the construction and energy and water usages of Micron does not irreparably harm the fabric of our community.

Despite consistently hearing that Micron's plant will use more energy and water than neighboring New Hampshire and Vermont combined, I have not heard of a substantial plan to ensure that surrounding communities do not foot the bill for higher energy and water costs. Likewise, I have seen no plans to force Micron to build solar arrays on its massive roofs to reduce energy consumption.

Both the high water and energy use are very concerning to me, as several communities that have seen AI data centers and Bitcoin mining centers have already raised the alarms regarding the negative impacts these massive facilities bring.

I also have noted in the plans that Micron will be filling in several hundred acres of wetlands. Why is this being allowed? Does this not go against New York wetland protections and climate goals? I encourage all agencies to fight against these plans and assist Micron to redesign its facilities to protect these wetlands (that will be ever more important to absorb the runoff from the massive plant and parking lots).

As we move forward through this decade, climate change effects are increasingly present. Ensuring that a massive development such as Micron falls in line with the CLCPA is of utmost importance. We cannot develop as usual, we must pivot to sustainable development and water/energy use. I strongly urge all agencies, legislatures, and Micron executives to redesign to accommodate these concerns.

Many thanks,

Dominic Gambaiani

From: King Davids <info@kingdavids.com>
Sent: Monday, July 21, 2025 10:09 PM
To: chipsnepa@chips.gov
Subject: [EXTERNAL] Micron Support

Please accept this letter in support of the Micron project and Ryan McMahon's efforts supporting this project. We have been doing business in Onondaga County since 1974 and have seen many ups and downs. We think this project could put our community in a great growth position for the future and bring home some talent that left for better opportunities.

Thank you,
Nader Hatem
President
King David's Restaurant

From: Stephanie H <shitztal@umich.edu>
Sent: Tuesday, July 22, 2025 1:31 AM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Request for extension of public comment period on Micron's DEIS

Hello!

I'm a Syracuse resident who is very concerned about the development of the Micron plant. First and foremost, I want to request a period of at least 120 days for our communities to review the lengthy Micron DEIS document.

Thank you very much for your consideration!

All the best,

Stephanie Hitztaler

From: Noire Fade <noire.fade@gmail.com>
Sent: Tuesday, July 22, 2025 10:34 AM
To: chipsnepa@chips.gov
Subject: [EXTERNAL] Fwd: July 24: Public Hearing on Micron Facility in Liverpool, NY

To whom this may concern,

As a resident, the planned construction and operation of Micron as stated in the EIS cause me concern:
(1) PFAS are unregulated and there is no need to even monitor these chemicals' entry into our waterways and groundwater. These chemicals have been found in studies to be harmful to humans and not just to the environment we commonly think has no impact on us. If we don't monitor, we will not know, but public health hazards will be the outcome and will cost public money.

(2) Only 700 jobs are projected to hire from local households - less than a third of the jobs expected to be shipped in! Kindly consult historical records to grasp that economic development does not by itself alleviate poverty. This curious result stems from rising prices due to the newly created higher paying jobs, increased property prices, and higher taxes due to public remediation of public health and environmental impacts of economic "development". In short, without enforceable commitment by Micron, its presence will not lift the community out of poverty (i.e. the highest child poverty rate in the state?!), but will push more people into poverty and homelessness. The social responsibility of Rockefeller times we can only dream of today, so much for "progress".

(3) Restoration of lost ecosystems takes a long time and thus any development is a setback for the community. Impacts need more than shallow, unenforceable commitments. Wetlands are crucial in cleaning water for human use, so that their diminishment and degradation in favor of a development that uses considerable more water is outright dumb. Not only will Micron use considerably greater amounts of water that are being used now in the region, it will also release harmful chemicals into the water for us all.

(4) The loss of species due to (for the region and the people living in it) questionable development is not only heartbreaking and disrespectful, but could also significantly degrade the environment for human use.

Overall, I would encourage critical thinking rather than blindly accepting the myth that economic development of any kind is beneficial. Just as freedom does not come for free, economic development needs careful planning, because historical (and present) case studies show that it often widens income gaps, creates rather than alleviates poverty, and causes inflation for all residents. The times of ownership and accountability of companies is sadly over, so that community impact is restricted to degradation of environment causing increased public health costs as well as inflation.

The EIS needs to be revised to reflect enforceable commitment to the community and its environment to include that Micron cleans up after itself (an elementary manner taught to every child).

Sincerely,
J. Lange

----- Forwarded message -----

From: **Sierra Club Atlantic Chapter** <reply@emails.sierraclub.org>

Date: Mon, Jul 21, 2025 at 3:01 PM

Subject: July 24: Public Hearing on Micron Facility in Liverpool, NY

To: <noire.fade@gmail.com>



Dear Jana,

Micron - an American semiconductor company - is planning to build an enormous \$100 billion chips manufacturing complex just north of Syracuse, NY. **The public has until August 11th to weigh in on the [draft Environmental Impact Statement](#)**, which presents the many environmental and community implications of this massive project. It will:

- employ thousands of workers to build the four "fabs" over the next 16 years, and thousands more to run them
- consume one-third the amount of electricity used by New York City
- consume as much water as the city of Syracuse
- use thousands of tons/year of hazardous chemicals

A [daylong public hearing](#) — with sessions in the morning (10am-1pm), afternoon (2pm - 5pm) and evening (6pm - 9pm) — **will be held Thursday, July 24, at Liverpool High School, 4338 Wetzel Road Liverpool, New York 13090** ([map](#)).

[See this community website for a user-friendly summary of the many implications of this project, shortcomings of the DEIS, and pointers on how to submit comments.](#) Many experts who have been reviewing the DEIS have identified significant gaps in the analysis. You can also visit SustainCNY.org for more background information.

We hope you are able to join us in person at one of the hearings on Thursday, July 24th. If you are unable to join us in person, you can still submit written comment through August 11th. [See here on how to submit your written comments.](#) This is an opportunity to voice your concerns and opinions to Micron and urge them to be a leader in semiconductor manufacturing that puts sustainability and innovative green chemistry above pollution and overconsumption!

Thank you for all you do to protect NY's environment!

Don Hughes
Chips Oversight Committee Chair
Sierra Club Central Northern NY Group
dhughes171@gmail.com

[Donate Today](#)



Sierra Club
Atlantic Chapter

This email was sent to: noire.fade@gmail.com

This email was sent by the Sierra Club Atlantic Chapter
744 Broadway, Albany, NY 12210

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From: Sharon Murphy <murphy.sharon2012@gmail.com>
Sent: Tuesday, July 22, 2025 1:55 PM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Comment on Micron's plan for chips manufacturing complex

I have serious environmental and health concerns about Micron's plan for chips manufacturing.

193.38 acres of wetlands will be permanently lost on the project site along with 78.86 acres of associated building. Resulting carbon sequestration loss is not accounted for in Micron's evaluation of green house gas emissions. Restoring some wetlands as they propose rarely is as effective and diverse as keeping the original wetlands, and we don't have the luxury of decades to wait.

We are talking HOW MUCH electricity?!? It is astounding that this project will consume one-third the amount of electricity used by New York City.

HOW MUCH water?!? It is fantastical that this project will consume as much water as the city of Syracuse.

HOW MANY PFAS chemicals?!? Thousands of tons/year of hazardous chemicals are essential in this type of manufacturing. Industrial wastewater and sludge will contain PFAS. Where is the list? Where is the concern about more PFAS in our waterways? Nothing is being said about how the Onondaga city drinking water will be affected. You can be certain it will. It is inevitable. What then?

Where will the Oak Orchard solar array be moved to?

We are ONE species on the planet. Wildlife can't talk and take us to task. This project will wipe out a heron rookery, and habitat destruction for endangered Indiana, Long-eared, Tri-colored bats, Northern Harriers and short-eared owls, not to mention populations of birds migrating on the flyway. Haven't we done enough habitat destruction?

We need to think about the impact on the environment and health for people, wildlife, and our nest - Planet Earth. Thank you for this opportunity to comment.

Sharon Murphy, RN, MLS
385 Crescent Ave
Buffalo, NY 14214

From: LoriSkoog <skoogfarm@rochester.rr.com>
Sent: Tuesday, July 22, 2025 1:35 PM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Micron

Sir or Madam,

I am strongly opposed to the construction and operation of the proposed Micron facility. I agree with the position taken by the Atlantic Chapter of the Sierra Club opposing this project.

Gary Skoog
Brockport New York 24420

From: Malcolm <mgsmith1000@yahoo.com>
Sent: Tuesday, July 22, 2025 8:18 AM
To: chipsnepa
Cc: Indivisible Listserv CNY; cnyindivisible@lists.rise-up.net; SYR_letters
Subject: [EXTERNAL] Micron Technologies wetland destruction mitigation seems inadequate

As a staunch supporter of quality economic development in Central New York, I am dismayed at the Micron Technology environmental impact plan for mitigating the destruction of the wetlands at the Clay site. They should be urged and required to do better.

Jul 12, 2025 — A public comment period is open until August 11 on the Micron Draft Environmental Impact Statement. Public hearings will be held on July 24.

Malcolm Smith
Jamesville
315 558-1462

From: Jeffrey Cizenski <jeffreycizenski@gmail.com>
Sent: Wednesday, July 23, 2025 9:43 PM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Micron

I support micron in CNY

From: Zachary Crossett <zacharycrossett@gmail.com>
Sent: Wednesday, July 23, 2025 10:23 PM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Micron Hearing

To whom it may concern,

I have reviewed the materials provided including the environmental impact statement and I believe that this project is not only a net positive but a massive boon to this community at large.

Please proceed with my full support.

Thank you,
Zachary Crossett
Onondaga County Resident

From: Doller, Florence <FDoller@nbtbank.com>
Sent: Wednesday, July 23, 2025 5:01 PM
To: CHIPSNEPA@chips.gov
Cc: Kavney, David
Subject: [EXTERNAL] Letter of Support from NBT Bank for Micron Technology Project in the Town of Clay
Attachments: 07-23-2025_Letter of Support for Micron_NBT Bank_vF.pdf

Greetings from NBT Bank. Attached please find written comments being submitted on behalf of NBT Bancorp Inc. President and CEO Scott A. Kingsley.

If you have questions or need any additional information, please reach out to me using the contact information provided below.

Regards,

Florence R. Doller, CFMP

Senior Vice President and Director of Corporate Communications
Office: 607.337.6118 | Mobile: 607.226.1544
Corporate Communications



52 South Broad Street | Norwich, NY 13815
Visit our website! www.nbtbank.com



July 23, 2025

To Whom It May Concern,

On behalf of NBT Bank, we are writing to express our enthusiastic support for the Micron Technology project in the Town of Clay, New York. This transformative initiative represents a once-in-a-generation opportunity for our region and our state, and it is the result of years of thoughtful planning, rigorous environmental review and meaningful community engagement.

Since Micron's \$100 billion investment announcement in October 2022, our region has experienced a surge of optimism and momentum. The Draft Environmental Impact Statement (DEIS), developed through extensive expert analysis and public input, confirms that Central New York is uniquely positioned to lead the nation in advanced semiconductor manufacturing.

The economic impact of this project cannot be overstated. With 4,200 construction jobs, 9,000 permanent positions, and up to 40,000 additional jobs expected, Micron's investment will drive meaningful population growth and generate an estimated \$16.7 billion in annual economic output for New York State.

The Micron project is a bold and visionary undertaking that will position Central New York as a global leader in semiconductor innovation, and NBT Bank fully supports this initiative.

Respectfully,

A handwritten signature in black ink that reads "Scott Kingsley". The signature is written in a cursive, flowing style.

Scott A. Kingsley
President and CEO
NBT Bancorp Inc.

cc: Joseph R. Stagliano, President, NBT Bank, N.A.
David A. Kavney, President of Central New York and Pennsylvania, NBT Bank, N.A.
J. Ryan McMahon II, Onondaga County Executive

From: Matt Juliana <mattjuliana567@gmail.com>
Sent: Wednesday, July 23, 2025 2:05 PM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Syracuse Micron DEIS

I would like to request an extension of the Public Comment period to at least 120 days to review and comment on the DEIS, due to the immense size and intricate nature of the project and the report.

Thank you,

-Matt

From: Gwendolyn Muok <syracusenaacpactso@gmail.com>
Sent: Wednesday, July 23, 2025 5:35 PM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Request for Additional Time To Review DEIS

We are hereby requesting that the time to comment be extended to 120 days rather than the current 45 days.

Thank you for your consideration.

Gwendolyn Muok
President
Syracuse Onondaga County NAACP

Archived: Wednesday, August 13, 2025 9:27:35 AM

From: [Ken Wright](#)

Mail received time: Thu, 24 Jul 2025 00:47:16

Sent: Wed, 23 Jul 2025 20:45:44

To: [chipsnepa](#)

Subject: [EXTERNAL] MICRON Draft EIS 2025 Comments

Importance: Normal

Sensitivity: None

I am writing regarding the following.

Onondaga County Industrial Development Agency (OCIDA)

ATTN: Micron Project

335 Montgomery Street, Floor 2M

Syracuse, New York 13202

MICRON,

Please choose human safety and quality of life in your decisions on the industrial impact from the work at the new facility.

Sustainability is important for us all in that today's children will live with the effects of your actions.

You have the opportunity to be a leader in the example to put people and planet as priority vs secondary thoughts.

Please choose a better future for the residents near the factory.

If you don't choose safety and sustainable practices then know that people will be harmed by you and you will be at fault. So please please please choose to the right thing for all of us.

As always - Let me know how I can help!

Have a great day!

Ken Wright

People & Planet Advocate

[IKEA Foundation Ambassador](#)

[Donate to my current Covenant House Fundraiser](#)   

[Learn about the organizations I collaborate with to create a better future for all and connect with me on social media](#)

From: Brian Cappon <bcappon123@gmail.com>
Sent: Thursday, July 24, 2025 9:35 AM
To: chipsnepa@chips.gov
Cc: atlantic.chapter@sierraclub.org; shlawr2@aol.com; gale.pisha@newyork.sierraclub.org; info@allianceforagreenconomy.org
Subject: [EXTERNAL] Micron is environmental disaster

Micron is potential for absolute environmental disaster in Onondaga County. The use of forever chemicals near vulnerable wetlands and water resources alone should halt this project immediately. Elevated levels of forever chemicals in Lake Ontario and St. Lawrence river have already been recorded. Skaneateles lake is in danger of needing a water treatment plant. Three key rivers the Oneida , Seneca and Oswego river meet with in miles of the Micron project.

The amount of water and electricity required will contribute to all types of climate change issues. The Oneida river watershed is going to be decimated. Our Governor wants to focus on electric school buses while promoting a project that no number of electric vehicles will ever come close to offsetting. Proceeding with Micron will cause more damage and environmental harm than Solvay Process, Crucible Steel and Onondaga County sewage combined.

Syracuse and Onondaga County allowed Onondaga Lake to become the most polluted lake in the world. The lake still is not used as the swimming and boating center like it was at one time. As a lifetime resident I felt the shame and humiliation of growing up in a community with one of the greatest man made environmental disasters in U.S. history. My grandfather told me stories of sailing on Onondaga lake as a child. I'm 65 years old and the lake was a smelly, stinking mess most of my life. The pollution of Onondaga Lake should be evidence enough that Micron should not be built in Onondaga County.

We sold our sole as a community once with all the knowledge we have gained since we polluted Onondaga Lake how as a community can we let Micron come in and devastate our most valuable resource, our lands and water.

Brian Cappon
201 Windcrest Drive
Camillus NY

Get [Outlook for iOS](#)

Archived: Wednesday, August 13, 2025 9:28:39 AM

From: [Paul Ciavarri](#)

Mail received time: Thu, 24 Jul 2025 18:19:50

Sent: Thu, 24 Jul 2025 14:18:01

To: [chipsnepa](#)

Subject: [EXTERNAL] MICRON DEIS public comment

Importance: Normal

Sensitivity: None

Dear Sir or Madam:

I am writing in reference to the publicly stated request by many concerned citizens of Onondaga County to extend the public comment period on the MICRON-related Draft Environmental Impact Statement (DEIS). I fully support the request to extend the public comment period to at least 120 days.

Given the length of the DEIS, the time of year it is being released when less attention is being paid to public affairs, and the tremendous implications for social, environmental, and economic transformations from the MICRON project upon this region, a 120 review period makes a lot of sense.

Should such a review not be afforded the community, I will understand those who may come to question the purpose of conducting the DEIS at all, especially given that many professionals who are used to in-depth study of difficult issues are calling for an extended review.

Finally, it will be understandable if public interest turns to public opposition should the community be denied a fair chance to review and respond to the tremendous implications of MICRON's proposed project. Governance of this project in a way to easily sideline a widely felt, common-sense set of concerns would be evidence of an unacceptable set of governance standards for representative government anywhere in New York State.

I hope the DEIS will be extended at least 120 days for fuller community review.

Sincerely,
Paul Ciavarri

From: Christopher Harris <cahgrl@rit.edu>
Sent: Thursday, July 24, 2025 8:56 AM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Public Comment in Support of Micron's Environmental Review

To whom it may concern,

I am writing to express strong support for Micron's proposed semiconductor manufacturing project in Central New York and to affirm the importance of the environmental review now underway. I serve in a leadership role at a university deeply engaged in workforce development and economic innovation. My work connects me regularly with partners across the semiconductor ecosystem—from global firms like Micron to emerging startups and equipment manufacturers. I also live in Upstate New York and care deeply about the region's long-term health and prosperity.

Micron's project is far more than a construction initiative. It is a generational investment in American manufacturing, a strategic national asset to bolster critical supply chains, and a rare opportunity to shape Central New York's future in ways that are inclusive, resilient, and collaborative.

With a project of this magnitude come serious, legitimate questions about environmental impact. The scale is unprecedented. The timeline is ambitious. The scrutiny is warranted. New Yorkers deserve confidence that this project will align with the region's environmental priorities—protecting water, air, energy systems, and natural ecosystems. This review is not a roadblock; it's a building block for lasting success.

What gives me confidence is both the process and the people. Micron has engaged consistently with local leaders, educators, and community partners. This is not a company looking to rush approvals and vanish. It is making twenty-year decisions—and laying the groundwork for long-term presence and accountability.

Nowhere is this more evident than in workforce development. Institutions like mine are working with Micron and the Micron Foundation to reimagine engineering education, expand pathways for underserved students, and connect local talent to global opportunity. This is about more than jobs. It's about building a durable ecosystem of innovation, education, and inclusion.

This is a rare and vital opportunity for our region. It must be done responsibly—and it must move forward. I offer my full support and remain committed to helping ensure the project lives up to its promise.

Sincerely,

Chris Harris

Chris Harris

Assistant Vice President, Government and Community Relations
Rochester Institute of Technology
P: 585-474-6169
cahgrl@rit.edu

From: jill.r.everett@lmco.com on behalf of greg.larioni@lmco.com
Sent: Thursday, July 24, 2025 10:01 AM
To: chipsnepa@chips.gov
Cc: richard.l.cordaro@lmco.com; greg.larioni@lmco.com
Subject: [EXTERNAL] MICRON Draft EIS 2025 Comments

The Micron project in Central New York leverages the region's talent and infrastructure building upon the thriving aerospace and defense industry. The success of local companies such as Lockheed Martin and Micron will enhance the U.S. defense industry and their presence will have a positive impact on the Central New York community, driving growth and expansion.

Sincerely,
Greg Larioni, VP Programs, Lockheed Martin
and
Rick Cordaro, VP/GM, Lockheed Martin

Greg Larioni
Vice President Programs
Enterprise Operations, Lockheed Martin
O: 315-456-2900 | M: 315-409-9365



From: Martha Loeffler <mkloeffl@pm.me>
Sent: Thursday, July 24, 2025 12:19 PM
To: chipsnepa@chips.gov
Subject: [EXTERNAL] Environmental impact statement

Hello. I would like to request a printed copy of the environmental impact statement for the proposed micron facility. My name / address is:

Martha Loeffler
101 Sycamore St, 13
Liverpool, NY 13088

I would be willing to pick up a copy if you will not mail it. Please let me know if this is possible.

If there is an economic impact study, I would like to request that as well.

Thank you,
Martha Loeffler

Archived: Wednesday, August 13, 2025 9:27:41 AM

From: [Manning, Jody F.](#)

Sent: Thu, 24 Jul 2025 01:17:14

To: [chipsnepa](#)

Subject: [EXTERNAL] public statement

Importance: Normal

Sensitivity: None

Attachments:

[Outlook-s2s4oi0f.png](#) 

“As the executive director for New York State’s first ever regional STEAM High School in the Syracuse City School District, I want to express our sincere appreciation for Micron’s unwavering commitment to education in our region. From day one, Micron has been a wonderful partner in helping us get this transformative project off the ground. Their support has gone far beyond just funding, they have brought vision, collaboration, and a genuine investment in our students’ futures. Thanks to Micron, we are building more than just a school, we are building a launchpad for the next generation of innovators, right here in Central New York. They’ve shown up at the table not just as sponsors, but as true thought partners. This is the kind of public-private partnership that redefines what’s possible for our schools, our students, and our community. Thank you.”

Dr. J. Francis Manning, MBA, Ed.D.

□

From: Alan Marzullo <amarzullo@ibew43.org>
Sent: Thursday, July 24, 2025 4:37 PM
To: chipsnepa
Subject: [EXTERNAL] ATTN: Micron Project /IBEW Local 43 - Public Comment Submission
Attachments: Public Statement from Alan Marzullo.pdf

To whom it may concern:

Please see the attached public comment submission on the Micron Project in Clay, NY for the records.

Regards,

Alan Marzullo

Alan Marzullo
IBEW Local 43
Business Manager/Financial Secretary
Phone: 315-422-0435 ext. 101
Cell: 315-480-6401
Email: amarzullo@ibew43.org



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www.IBEW43.org



Public Statement from Alan Marzullo
Business Manager / Financial Secretary, IBEW Local 43
On the Micron Project in Clay, New York

As the Business Manager of the International Brotherhood of Electrical Workers Local 43, I am honored to represent over 1,500 dedicated members and 200+ apprentices who power the backbone of Central New York's infrastructure. Today, I speak with extraordinary pride and optimism about the Micron Project in Clay, New York, a project that is not only historic in scale, but transformative in its potential to reshape the economic and social landscape of our region for generations to come.

Micron Technology's decision to invest up to \$100 billion in a state-of-the-art semiconductor manufacturing campus in Clay is a once-in-a-century opportunity. This is not just a facility, it is a cornerstone of a new era for Central New York. It is projected to create up to **9,000 direct high-tech jobs**, and tens of thousands more in construction, supply chain, logistics, and support services. For IBEW Local 43, this means **up to 3,000 electricians** will be needed during the peak of construction, and **400 to 600 permanent positions** will be required to operate and maintain the facility once it is fully operational.

This is the largest private investment in New York State history, and we are ready to meet the moment.

Investing in Our Workforce

To prepare for this unprecedented demand, IBEW Local 43 is making bold, strategic investments in our workforce. We are more than **doubling our apprenticeship intake**, expanding our training center with a **\$7 million facility upgrade**, and working to **accelerate our training program** from five years to four without compromising the quality and rigor that define our craft.

With the support of a **\$1 million state workforce development grant**, we will be able to train over **100 new apprentices annually**, ensuring that our region has the skilled electricians needed not only for Micron, but for the wave of development that will follow in its wake. This is about building careers, not just filling jobs.

A Catalyst for the Construction Industry

The Micron Project is a game changer for the construction industry in Central New York. From site development and power infrastructure to cleanroom technology and advanced automation systems, this project will require the full spectrum of skilled trades. It will elevate industry standards, introduce innovative technologies, and provide long-term employment opportunities for thousands of union workers.

This is more than a job site, it is a living classroom. It will serve as a training ground for the next generation of tradespeople, offering real-world experience on one of the most advanced construction projects in the country.

A Lifeline for Our Communities

Micron's commitment to Central New York extends far beyond its campus. Through the **\$500 million Green CHIPS Community Investment Fund**, Micron, the State of New York, and local partners will invest in **education, workforce development, housing, transportation, and infrastructure**. This means:

- **Stronger schools** and STEM programs to prepare our youth for high-tech careers.
- **Affordable housing** to support working families and reduce displacement.
- **Improved public transit and infrastructure** to connect communities and job centers.
- **Expanded community services** that enhance quality of life for all residents.

This project gives our young people a reason to stay in Central New York. It gives families hope for a better future. It gives our region a renewed sense of purpose and pride.

A Strategic Win for New York State

At a time when global supply chains are under pressure and national security is tied to technological independence, the Micron Project positions New York as a **national leader in semiconductor manufacturing**. It will attract a robust ecosystem of suppliers, research institutions, and innovation hubs, creating a **high-tech corridor** that stretches from the Mohawk Valley to the Finger Lakes.

The economic ripple effects will be felt across the state from increased tax revenues and small business growth to expanded educational partnerships and global investment. This is not just a regional project, it is a strategic asset for the entire state and the nation.

A Call to Action

IBEW Local 43 is ready. We are expanding, training, and preparing for the future. But we cannot do it alone. We call on our partners in **government, education, and industry** to continue investing in workforce development, to support career and technical education, and to ensure that **union labor remains at the heart** of this historic project.

Let us be clear: this is more than a construction job. It is a legacy. It is a turning point for Central New York. And we are proud, deeply proud to be building it together.

Respectfully,

Alan Marzullo

Alan Marzullo

Business Manager / Financial Secretary
IBEW Local 43

From: Jeff Norensky <jnorensky@gmail.com>
Sent: Thursday, July 24, 2025 5:26 PM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Comments on micron EIS

I live off Caughdnoy Road at the Country Meadows development. My name is Jeffrey Norensky and my address is 8231 Fuchsia Path, Clay, New York.

I am writing you to Address my concerns on the planned Traffic patterns to the new Micron facility. The two major highways that people and construction equipment will use in transit to the newMicron Facility, I believe are route 81 which will have a special road built from the highway directly into the micron property. However, people traveling on route 481 most likely will get off at the Caughdnoy Road exit.

My concern is that Caughdnoy Road between Maple Road and route 31 Is totally inadequate for heavy traffic and commercial trucks. The road is only two lanes and has no shoulder. About 5 feet off the road are drainage ditches.

It is basically a rural Road with many bends. It also has many housing developments on it and people jogging and bicycling on this section of the road. And more recently I have seen numerous adolescents riding on electric bikes and scooters.

This area has no walking or bike paths. It is not suitable for the traffic you are anticipating to use this road. I would suggest you encourage traffic to use Route 31 or Henry Clay blvd. Particularly truck traffic.

From: Patty Pack <patty.pack@gmail.com>
Sent: Thursday, July 24, 2025 4:59 PM
To: chipsnepa
Subject: [EXTERNAL] Micron Draft EIS

I am very concerned about the shortness of the public comment period. It needs to be substantially extended.

I also find about the generalities of the chemicals listed to be concerning. The public has a right to know which specific chemicals are being used.

Thank you,
Patty Pack
324 Fellows Ave
Syracuse, NY 13210
315-41-6399

From: Raymond, Vince <vraymond@vipstructures.com>
Sent: Thursday, July 24, 2025 1:52 PM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] MICRON project

I am writing to **enthusiastically support** the Micron project in Syracuse. While a project of this size can not be accomplished without some disruption or change, I firmly believe this transformative project is a requirement to continue the leadership path that New York State is on, and I believe this is the right site for the project. It appears all reasonable mitigation measures have been considered, and this project **MUST** move forward for the sake of Central NY, the entire state, and most importantly our children and generations to come.

Please pass this project

All the best,
Vince

Vince Raymond, DBIA
Vice President of Client Relations

Main Phone: 315.471.5338
Mobile: 315.415.3395
vraymond@vipstructures.com



101 N. Salina St | Suite 100 | Syracuse, New York 13202



From: Josh Veronica <jveronica@thepartnership.org>
Sent: Thursday, July 24, 2025 3:52 PM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Micron Comment
Attachments: Micron DEIS Letter.pdf

Good afternoon:

On behalf of the co-convenors of the NY SMART I-Corridor Regional Tech Hub, please see the attached comment re: the Draft Environmental Impact Statement for Micron Technology's proposed facility in Clay, NY.

Josh Veronica
Director of Government Affairs
Buffalo Niagara Partnership





July 24, 2025

Onondaga County Industrial Development Agency
ATTN: Micron Project
335 Montgomery Street, 2nd Floor
Syracuse, New York 13202
CHIPSNEPA@chips.gov

**COMMENT FROM NY SMART I-CORRIDOR CO-CONVENORS
RE: DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR
MICRON'S CLAY, NY SEMICONDUCTOR MANUFACTURING PROJECT**

On behalf of the NY SMART I-Corridor, we appreciate the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for Micron Technology's proposed semiconductor manufacturing site in Clay, New York.

This project aligns with the priorities of the NY SMART I-Corridor, a federally designated Tech Hub that connects Buffalo, Rochester, Syracuse, and surrounding communities to build a resilient semiconductor manufacturing ecosystem. Supported by \$40 million in federal funding and significant investment from New York State, the NY SMART I-Corridor exists to ensure this region leads in domestic chip production, workforce development, and supply chain expansion. Micron's historic investment in Onondaga County will transform this vision into reality.

We commend Micron and the Town of Clay for the transparency and detail demonstrated in the DEIS. The document includes detailed plans for managing water use, protecting wildlife, reducing traffic impacts, and limiting air emissions. The plan lays the foundation for a long-term partnership between Micron and the surrounding communities that is built on accountability and shared progress.

As global demand for semiconductors grows, the question is no longer *if* facilities like this will be built, but *where*. Building in New York State, under strong state environmental

Building America's Semiconductor Future in Upstate New York | NYSMARTiCorridor.com

standards, ensures the carbon footprint of this project will be minimized. New York's electric grid is significantly less carbon intensive than that of other states, and CLCPA-related mandates will limit both the project's direct and indirect emissions. Locating this project elsewhere would risk significantly more carbon emissions and fewer environmental protections. Welcoming Micron to Onondaga County isn't just an economic opportunity; it's an environmentally responsible choice.

While the proposed development carries environmental impacts that must be carefully managed, it also presents significant opportunities, including thousands of well-paying jobs, strengthened national security, and long-term economic growth that will establish Upstate New York as a national leader in this critical industry.

Micron's impact will be substantial: up to 9,000 direct jobs, more than 50,000 additional regional jobs, and \$100 billion in private investment over the next two decades¹. With thoughtful mitigation strategies in place, these economic benefits can be achieved in an environmentally responsible way.

We urge each department to advance this project and continue working with Micron to ensure this economic engine comes to fruition in an environmentally sustainable way.

Sincerely,

Dottie Gallagher

President & CEO

Buffalo Niagara Partnership

Joseph Stefko

President & CEO

OneROC

Benjamin Sio

Acting President & CEO

CenterStateCEO

¹ "Micron Announces Historic Investment of up to \$100 Billion to Build Megafab in Central New York," *Micron Technology*, Oct. 2022, <https://investors.micron.com/news-releases/news-release-details/micron-announces-historic-investment-100-billion-build-megafab>.

Archived: Wednesday, August 13, 2025 9:27:35 AM

From: [Ken Wright](#)

Mail received time: Thu, 24 Jul 2025 00:47:16

Sent: Wed, 23 Jul 2025 20:45:44

To: [chipsnepa](#)

Subject: [EXTERNAL] MICRON Draft EIS 2025 Comments

Importance: Normal

Sensitivity: None

I am writing regarding the following.

Onondaga County Industrial Development Agency (OCIDA)

ATTN: Micron Project

335 Montgomery Street, Floor 2M

Syracuse, New York 13202

MICRON,

Please choose human safety and quality of life in your decisions on the industrial impact from the work at the new facility.

Sustainability is important for us all in that today's children will live with the effects of your actions.

You have the opportunity to be a leader in the example to put people and planet as priority vs secondary thoughts.

Please choose a better future for the residents near the factory.

If you don't choose safety and sustainable practices then know that people will be harmed by you and you will be at fault. So please please please choose to the right thing for all of us.

As always - Let me know how I can help!

Have a great day!

Ken Wright

People & Planet Advocate

[IKEA Foundation Ambassador](#)

[Donate to my current Covenant House Fundraiser](#)   

[Learn about the organizations I collaborate with to create a better future for all and connect with me on social media](#)

From: Martha Cline <marthcline@aol.com>
Sent: Friday, July 25, 2025 8:36 AM
To: chipsnepa
Subject: [EXTERNAL] Micron Project

I am writing to add my input in the community comment stage of this project.

We do not need a behemoth industrial building in our area. I read that 10 years will be required for build out and finishing to production. In 10 years this industry will have changed so much the unfinished project is defunct. Business has to be more flexible these days.

I am very surprised MICRON hasn't realized that and is proposing their manufacturing with a different paradigm. This is obvious.

It would be far more useful and practical for our area and for the company if the production were broken down into segments, and yes, placed in multiple locations. This disperses traffic patterns, could build to infill spaces in existing 'industrial' or business areas, etc. The company will claim this isn't financially feasible or reasonable. But it is. Make them think outside their box, which is nothing but a box designed for their convenience, with no thought to where they will be or what they leave behind. Make them build chips so it helps the Syracuse area, not further blight it down the road.

If you aren't willing to require smaller components to be created of the process, it would be great to require them to build this big manufacturing building with the infrastructure that could be adapted to condos when they are through with it. Require them to put in wiring and plumbing accesses while they are building, so options for reuse are possible when it becomes an abandoned shell, as it will.

Smaller manufacturing buildings are the smart way to go, for sustainability and practicality, and for less environmental impact and for easier reuse after the company leaves. This is not a radical, new management idea. This has become the obvious planning principle by now in companies.

And at the end point, if MICRON can't come in here, doing their business in a way that supports our area, rather than just provides what they want to take, they aren't worth it. Hard conclusion I know, but this project has some very big holes in it, or another way to put it, big assumptions that are built in. And they need to be challenged and not accepted.

Martha Cline
523 River Ledge Rd.
Hammond, NY 13646

From: Dave Stage <davestage@me.com>
Sent: Friday, July 25, 2025 10:00 AM
To: chipsnepa@chips.gov
Subject: [EXTERNAL] Micron Deis

How will the forever chemicals used in the manufacturing process be removed from the effluent? Will any of the forever chemicals be discharged into the Seneca River? What new technologies might be used to reduce and recycle waste? Will there be smelly waste holding ponds on site? Thank You.

Sent from my iPhone

From: Theresa Stowell <stowelltheresa@gmail.com>
Sent: Saturday, July 26, 2025 8:56 AM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Micron

We need a public transportation plan. Successful, flourishing metropolitan areas have robust, easy to use, convenient, and efficient public transportation. There must be convenient ways for people to at least get to/from micron, downtown Syracuse, the airport, and each of the suburban town centers, as well as around the city of Syracuse. Reliance on individual motorized vehicles and the need for parking is one major hindrance for our area's growth and success.

From: malcolm smith <mgsmith1000@yahoo.com>
Sent: Sunday, July 27, 2025 3:24 PM
To: chipsnepa
Subject: [EXTERNAL] Wetlands

Need more commitments on remediating the wetlands loss. Also sewage remediation.
Malcolm Smith
315-558-1462

From: KELLY GUILES <henryskelly@yahoo.com>
Sent: Monday, July 28, 2025 6:11 PM
To: chipsnepa
Subject: [EXTERNAL] MICRON public comment

481 N sound barriers need to be installed by the existing Caughdenoy Rd exit. As someone who's property backs up to this, the noise has increased tremendously, and is only going to get worse. You can go outside anytime day or night and it's definitely polluting our community.

-Kelly Giarrusso

From: ROBERT SHENFELD <rshen6@aol.com>
Sent: Monday, July 28, 2025 12:59 PM
To: chipsnepa
Subject: [EXTERNAL] 8762 Brewerton Road

My name is Robert Shenfeld owner of Mercantile Studio at 8762 Brewerton Road. My question is about the proposed Exit from 81 to the North entrance of Micron on Brewerton Road. I have spoken with the DOT and the offices of the Oonodaga County Office of Economic Development and both have stated that in fact my property is under consideration along with a plan slightly North of my property. I understand that it is early in the planning to determine the exact location of the off ramp and realize my property is being considered as one potential site. I have included a map that shows one option where (the building with the green roof is my factory) the exit ramp goes thru my property as shown below. Because of the uniqueness of my factory it took several years to locate a suitable location for our manufacturing. I would appreciate any insight into this so I will be able to plan.

Robert Shenfeld
8762 Brewerton Road
Brewerton NY 13029
315-436-8869



Micron
North Entrance

Crop

Potential
Interchange

INTERSTATE
81

11

From: Cindy Taren <cmt3155@live.com>
Sent: Monday, July 28, 2025 12:24 PM
To: CHIPSNEPA@chips.gov; Comments.Micron2025@dec.ny.gov
Cc: economicdevelopment@ongov.net
Subject: [EXTERNAL] public comment related to Micron fab proposed in Clay
Attachments: comment for Micron write in period.docx

Please see the attached comments on DEC permit applications for the Micron Semiconductor Facility and the DEIS. These comments are in response to BOTH the DEC permits AND the DEIS. My contact information is in the attached document.

Cindy Taren

Cindy Taren

1641 County Highway 13

New Berlin, NY 13411

cmt3155@live.com

315-404-1664

July 28, 2025

RE: Comments on Micron Semiconductor Facility DEIS (Clay, NY)

To Whom It May Concern,

I am submitting these comments regarding the Draft Environmental Impact Statement (DEIS) for the proposed Micron semiconductor fabrication facility in Clay, NY. While I reside approximately 80 miles from the site, the scale of this project raises significant concerns about its regional impacts, including effects on wetlands, water resources, pollution, and downstream communities like Pittsfield. Below are my key questions and comments for the record:

1. Wetland and Habitat Destruction

The DEIS acknowledges the permanent loss of **193 acres of federal wetlands** and **6,283 linear feet of surface water features**, with mitigation proposed at a 2:1 ratio. However:

- How will the mitigation sites be monitored and enforced to ensure ecological equivalence, especially given the irreversible loss of existing wetland functions (e.g., flood control, species habitat)?
- What safeguards are in place to protect federally listed species (e.g., Indiana bat, northern harrier) during and after construction, given the acknowledged "unavoidable" harm to their habitats?

2. Water Resource Strains

The project's water demand and wastewater discharge pose risks:

- How will Micron ensure that wastewater containing **chemical toxins** (e.g., PFAS, heavy metals) from semiconductor manufacturing will not contaminate groundwater or downstream communities?

3. Air Quality and GHG Emissions

While the DEIS states compliance with air quality standards, the project's "**unavoidable**" **GHG emissions** conflict with New York's CLCPA goals:

- How will Micron's "significant adverse effects on climate change" be reconciled with state mandates?
- Will the promised renewable energy credits (RECs) actually reduce regional emissions, or merely offset them on paper?

4. Cumulative Impacts on Surrounding Communities

While the DEIS acknowledges the project's growth-inducing effects, smaller communities like mine—though potentially benefiting from economic spillover—**may lack the financial capacity to absorb sudden strains** on housing, infrastructure, and public services. For example:

- How will Onondaga County coordinate with surrounding towns to ensure **equitable distribution of tax revenues** or state/federal aid to offset costs (e.g., road maintenance, school enrollment surges, emergency services)?

- What mechanisms (e.g., regional task forces, Micron-funded grants) will be implemented to help smaller communities **plan for and manage growth** without overextending local budgets?

The DEIS assumes local governments can adapt, but many lack resources for proactive planning. Clear commitments from OCIDA and project partners are needed to prevent smaller towns from bearing disproportionate burdens.

5. Transparency and Long-Term Accountability

- How will the public access real-time data on pollution, water usage, and mitigation progress?

- What financial assurances (e.g., bonds, penalties) will Micron provide to cover future remediation costs if environmental harm occurs?

I urge the agencies to:

1. **Strengthen mitigation requirements** for wetlands and species impacts, with independent oversight.

2. **Mandate stricter pollution controls** for wastewater and air emissions, including zero-discharge standards for hazardous chemicals.

3. **Expand the environmental justice analysis** to include downstream communities like mine, which may face indirect burdens.

4. **Require a phased construction review** to reassess impacts at each stage, rather than relying on upfront projections.

5. **Create a dedicated conservation area** of equal or greater size (e.g., 250+ acres) within the region, with comparable hydrologic and ecological features to the lost wetlands.

- Partner with local environmental organizations to **permanently protect and restore** this land as a refuge for displaced species (e.g., bats, grassland birds) and a carbon sink.

- Publicly commit to this mitigation upfront**, with transparent monitoring, to demonstrate responsiveness to community concerns about environmental trade-offs.

This would not only address ecological damage but also build trust with residents who fear the project's legacy will be purely industrial. The **permanent loss of 193 acres of wetlands and critical wildlife habitat** demands proactive, compensatory conservation.

This project must not prioritize economic gains over irreversible ecological harm. Thank you for considering these concerns. I request written responses to my questions and notification of any revisions to the DEIS.

Sincerely,
Cindy Taren

From: Robert Kuehnel <rhkuehnel@gmail.com>
Sent: Tuesday, July 29, 2025 5:33 PM
To: chipsnepa@chips.gov
Subject: [EXTERNAL] Comment on the Micron DEIS

I am writing to comment on the DEIS on the impacts of the construction and operation of the set of semiconductor fabrication plants that are planned in the Town of Clay, Onondaga County, State of New York. I am a resident of Onondaga County, as I live in the Town of LaFayette south of Syracuse. I am a clinical psychologist who is devoting my time in retirement from the Syracuse Veterans Administration to understanding the human impacts of climate change and environmental degradation. I am a former Treasurer and Member of the Board of Directors of Onondaga Audubon, the local chapter of the National Audubon Society, an organization whose mission is the preservation of the birds of North America and their habitats. I am also a volunteer with Citizens' Climate Lobby, an organization that works toward bipartisan solutions to the climate crisis. While these affiliations inform my opinions, the comments below are my own.

In 2025, at the end of a decade that saw the highest world temperatures in recorded history, and in the wake of a recent report that documented the loss of 3 billion North American birds in the past 50 years primarily due to habitat loss, the construction of fabrication plants that will destroy over 200 acres of wetlands, pour a virtual sea of highly carbon polluting concrete over many additional acres secured by similarly highly polluting steel, and consume an ungodly amount of power once up and running, seems ill-advised to say the least. But I understand that the interests of individual, private citizens will not outweigh the economic forces that will result in the construction of the plants. So, my request is that Micron be taken to task on the environmental remediation that will be necessary to secure the habitats of endangered bats, threatened grassland birds, countless turtles, snakes, and other reptiles, amphibians, and mammals whose habitats will be destroyed. I trust you have been noting the highly informed comments that have been appearing in the Opinion pages of the Syracuse Post-Standard that explain why simply setting aside a limited amount of land for wetland restoration will fall short of the intended outcomes.

My recommendation is that the plan for environmental remediation of the huge impacts of the construction of these fabs be revisited with the comments of the environmental community in

mind. We need more land set aside to accommodate the needs of the bats, birds, and other creatures to adapt to, in hopes of their populations not be significantly or entirely decimated. We need these properties to be thoroughly repurposed, including the proliferation of native plants and water features to resemble the destroyed tracts of land as much as possible. And we need a team of biological and botanical experts to oversee the construction of these repurposed properties and their curation for at least two decades into the future. We will never undo the damage caused by the construction of the facility, but we can require that the economic beneficiaries devote a modicum of their profits to the best remediation possible.

Robert Kuehnel, Ph.D.
6772 Colton Road
LaFayette, NY 13084

From: Wayne Morris <wthomasmorris@icloud.com>
Sent: Tuesday, July 29, 2025 6:13 PM
To: CHIPSNEPA@CHIPS.GOV
Subject: [EXTERNAL] Micron

I have concerns regarding the new Micron plant that is planned in the Town of Clay. My first concern is the air quality and the effect it will have on the health of the people who live in that area. It is a very populated area and I have family member who live within three miles of the plant. Another concern is the waste water that will be given off by the plant that will be emptied into the rivers that flow into Lake Ontario. Lake Ontario is used as a source of drinking water in this area. Lastly has there been any published research on both of these concerns.

Wayne Morris

From: joby.swerdlow@gmail.com
Sent: Tuesday, July 29, 2025 7:59 AM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Micron environmental project

Please pay particular attention to the “Post Standard” opinions by two PhD’s: Catherine Landis, an ESF field botanist, and Madeline Nyblade, an ESF hydrologist. Both articulate significant concerns and suggest potential alternatives, which are particularly cogent to the long term success of the Micron project.

As a retired pathologist with natural history interests, I could send you an email on water and air pollution risks by the Micron project, plus damage to fragile wetland and forest inhabitants. However, Drs. Landis and Nyblade are both remarkably thorough in their letters, which should be seriously read and heeded.

Thank you.

Sent from my iPad

[HeeWon Brindle-Khym – Jobs to Move America](#)

From: HT K <heewonkhym@hotmail.com>

Sent: Thursday, July 31, 2025 12:20 PM

To: chipsnepa <chipsnepa@chips.gov>

Subject: [EXTERNAL] RE: Public Comment on the Micron Project DEIS (Clay, NY) – Request for SEIS

HeeWon Brindle-Khym
New York, NY 10034
heewonkhym@hotmail.com

July 31, 2025

New York State Department of Environmental Conservation
Division of Environmental Permits
chipsnepa@chips.gov

RE: Public Comment on the Micron Project DEIS (Clay, NY) – Request for SEIS

Dear SEQRA Lead Agency and Reviewing Authorities,

I am submitting this comment regarding the Draft Environmental Impact Statement (DEIS) for the Micron Technology semiconductor fabrication facility proposed in Clay, New York under the Green CHIPS program. Upon review of the DEIS, it is evident that the analysis as presented is incomplete, inadequate, and procedurally deficient in multiple respects under the standards required by the State Environmental Quality Review Act (SEQRA).

Accordingly, I urge the agency to issue a Supplemental Environmental Impact Statement (SEIS) and withhold any permit approvals until the following fundamental deficiencies are fully addressed:

1. Traffic Modeling Inadequacy

The DEIS traffic analysis lacks sufficient granularity and fails to provide disaggregated modeling of peak-hour congestion impacts, particularly along Route 31, Interstate 481, and local connector roads in the North Syracuse and Liverpool communities. Furthermore, the analysis does not incorporate cumulative impacts from induced growth, school bus patterns, and concurrent construction traffic. A supplemental review must address:

- Multi-modal transportation impacts (including freight and rail logistics),

- Specific infrastructure upgrades required, and
- Long-term regional congestion patterns during phased build-out.

2. Stormwater and Groundwater Risks

Despite the scale of site disturbance, the DEIS does not offer sufficient analysis of stormwater retention, soil permeability, or flood risk associated with extreme weather events. The project lies in proximity to sensitive watershed areas and a growing number of impervious surfaces raise concerns of runoff pollution and downstream flooding.

We request detailed hydrological modeling, engineered mitigation plans, and public disclosure of soil stability assessments before proceeding.

3. Endangered Species – Bat Habitat Disruption

Micron’s construction timeline may conflict with federal and state protections for endangered bat species, including the Northern Long-Eared Bat and Indiana Bat. The DEIS provides only cursory habitat screening and fails to define seasonal clearing restrictions, tree survey protocols, or bat presence verification.

Without a detailed assessment, including a Habitat Conservation Plan (HCP) and seasonal tree-clearing enforcement framework, this omission risks violating federal Endangered Species Act protections and must trigger a supplemental review.

The DEIS fails to adequately address impacts on federally and state-listed endangered bat species, including the Northern Long-Eared Bat. The site includes potential summer roosting habitat, yet no formal tree surveys, acoustic monitoring, or Section 7 consultation results have been disclosed. The absence of this data represents a critical deficiency under SEQRA’s ‘hard look’ requirement and the federal Endangered Species Act.

If seasonal restrictions apply, clearing must be postponed until after November 1 or delayed until the following spring, thereby rendering the current construction schedule infeasible.”

4. Displacement and Housing Pressure

The DEIS fails to analyze the direct and indirect housing market impacts resulting from a projected influx of 9,000 construction workers and thousands of permanent fab workers. These pressures are particularly acute in low-income renter communities in Onondaga County and surrounding municipalities.

No clear methodology is offered to assess displacement risks, rental inflation, or demand on affordable housing infrastructure. A full housing impact analysis, conducted by independent experts, is essential to mitigate socioeconomic harm.

5. Air Quality Impacts – Insufficient Modeling

The DEIS lacks clear modeling of volatile organic compounds (VOCs), particulate matter, and other emissions related to fab operations, diesel construction fleets, and chemical deliveries. Furthermore, cumulative exposure analysis, including hazardous air pollutants (HAPs) under Clean Air Act thresholds, is not sufficiently addressed.

The public has a right to understand long-term exposure risks, particularly for children, elderly residents, and immunocompromised individuals in nearby residential zones.

6. Non-Enforceable Community Investment Commitments

Micron’s much-touted \$500 million Community Investment Fund (CIF) and related benefits (education, housing, workforce development) are non-binding and not legally enforceable. The DEIS fails to explain how these commitments will be upheld, monitored, or adjusted if unmet.

Without transparency around the so-called “Green CHIPS Community Plan”, there is no public accountability

mechanism for CIF deployment, nor any third-party oversight requirements. The SEQRA process must evaluate mitigation credibility and enforceability, not just stated intentions.

Conclusion and Demand for Supplemental Review

For the reasons stated above, the current DEIS does not satisfy SEQRA's "hard look" standard, nor does it allow the public and reviewing agencies to fully assess the environmental, social, and economic impacts of the project. We therefore respectfully request that:

1. A Supplemental Environmental Impact Statement (SEIS) be prepared to correct the above deficiencies,
2. No permits or final approvals be issued until such review is completed, and
3. Future review processes include clear enforcement provisions, independent third-party oversight, and robust community input mechanisms.

Sincerely,

HeeWon Brindle-Khym

heewonkhym@hotmail.com

New York, NY

From: Sandy Morris <sandymorris01@me.com>
Sent: Tuesday, July 29, 2025 8:47 PM
To: CHIPSNEPA@CHIPS.GOV
Subject: [EXTERNAL] Fwd: Micron

Sent from my iPhone

Begin forwarded message:

From: Sandy Morris <sandymorris01@me.com>
Date: July 29, 2025 at 8:41:27 PM EDT
To: cerib-micron.public.comments@us-ace.army.mil
Subject: Micron

I am seeking to comment on the Micron Project in the Town of Clay in New York. I am very concerned about the health of myself, my family and my friends and neighbors living in this area. I believe that the particles that will come from this plant are going to be harmful to people especially the elderly and those with chronic health issues immediately. And in the future people of the all ages will be affected by these in the long term. I am also concerned about the wastewater that will be put in Lake Ontario which is where most of our drinking water comes from. With the way technology changes so quickly will the chips micron makes be phased out by updated technology? So is it worth building this plant and possibly endangering the health of so many people? I'm sure the people that decided the plant should be built here do not live here or even visit here. So why would they care about us!

Sent from my iPhone

From: Catherine Rudisill <cathyrudisill@gmail.com>
Sent: Wednesday, July 30, 2025 9:13 AM
To: chipsnepa@chips.gov
Subject: [EXTERNAL] Comments on Micron Draft EIS 2025
Attachments: Micron DEIS Comments.docx

Hello,

Attached are my comments pertaining to the Micron DEIS. Let me know if you have any questions.

Sincerely,
Cathy Rudisill

Catherine Rudisill
8150 Portobello Way
Liverpool, NY 13090

July 30, 2025

To:

Onondaga County Industrial Development Agency (OCIDA)

ATTN: Micron Project

335 Montgomery Street, Floor 2M

Syracuse, New York 13202

SUBJECT: Public Comment to the Micron Semiconductor Manufacturing Project, Clay, NY
Draft Environmental Impact Statement (EISX-006-55-CPO-001)

Dear OCIDA,

I am writing to you today as a resident of the Onondaga County and the Town of Clay. I am providing you with comments on the DEIS from Micron, with a particular focus on the management of hazardous chemicals that are expected to be used on site. Enclosed are general comments regarding the DEIS, as well as specific annotated comments on portions of the document (Part 1 and Part 2, respectively).

Sincerely,



Catherine Rudisill, MS

Part 1 – General Comments

- Micron’s DEIS does not provide sufficient detail regarding the hazardous chemicals that may be present in the generated wastewater once the facility is operational.
 - They acknowledge that PFAS will be used in their facilities, once completed. They do not specify which PFAS specifically will be used. This is important to know as the type of PFAS will dictate the appropriate treatment technology and if it is being managed properly.
 - Micron does not discuss any other hazardous chemicals that may be present in the wastewater, how likely they are to be removed, and how they will be managed.
- Micron’s environmental protection policies appear to be largely dictated by regulatory restrictions and policies, which do not equate to a sustainability program.
 - Regulatory compliance is a low bar, as it represents the absolute minimum that a company must achieve to legally operate.
 - Only a small subset of PFAS have established federal water quality limits. Most federal and state restrictions are focused on the two legacy PFAS, PFOS and PFOA. Since these two PFAS were voluntarily phased out of the market years ago, it’s unlikely that Micron is using these specific PFAS in their processes. This means the PFAS they are using are largely unregulated with regards to water quality standards.
 - We are currently in an era of regulatory backsliding with regards to federal protections. NY State offers a robust environmental regulatory framework, but like many states, it is resource constrained. We need to know how Micron’s environmental practices will not only meet but exceed regulatory standards and how they will hold themselves accountable to the community in which it operates.
- Micron is not being transparent about the well-documented challenges regarding the treatment and removal of PFAS from wastewater [Ref: <https://cen.acs.org/environment/persistent-pollutants/Getting-PFAS-drinking-water/102/i20>].
 - PFAS are notoriously difficult to remove from water.
 - Micron has listed several treatment technologies that have been proposed to treat PFAS to the “ppt” level, but it has not addressed which of these technologies it may use and what the potential drawbacks are given that PFAS water treatment is developing field with many uncertainties. Are these technologies even capable of treating semiconductor wastewater to this level?

- Management of PFAS at these facilities needs to be a top priority for Micron, as accidental releases or mismanagement means the contamination of the Oneida River, the primary catchment for treated wastewater, and associated watersheds with hazardous “forever chemicals”.
- Micron has disclosed where the planned IWWTP will discharge but does not specifically state if discharging to the Oneida River will directly impact intake for surrounding municipal water treatment facilities and who’s drinking water is at risk should their treatment plan fail.
- Micron as disclosed that over 14 million gallons of hazardous liquids and over 1 million lbs of hazardous gases will be stored on site per fabrication facility.
 - Micron should consider extensive onsite and local monitoring of environmental media to monitor accidental leaks.
 - Continuous monitoring approaches using GIS or remote-sensing offer more extensive monitoring of contaminant inputs than traditional grab-sampling. Micron should adopt these practices in their environmental management plan.
- The best way to manage the risks of PFAS is to stop using PFAS. This is consistent with the “hierarchy of controls” reported in Figure 3.9-1, which prioritizes the elimination of a hazard rather than controlling exposure.
 - While substitution of PFAS in certain processes may, in fact, be years away. There has already been documented success with substituting fluorosurfactants in semiconductor etching processes (see annotated comments below).
 - Eliminating PFAS is also advantageous for Micron as this eliminates difficult-to-treat substances from wastewater and a manufacturing process which requires immense amounts for ultrapure water. Micron stated they are essentially building separate outflows that would immediately separate PFAS from waste streams. In essence, they’re building around the PFAS they’re committed to using, but restructuring their process to eliminate PFAS is too cumbersome?

Part 2 – Annotated Comments on the Document

P 3-83

Micron lists numerous technologies claiming to be effective at removing various emerging contaminants like PFAS. Various types of water treatment technologies were named, but it's not clear if these are examples of what may go into the Clay site or the specific technologies planned. PFAS is an umbrella term that encompasses many thousands of substances which require different types of water treatment to effectively remove. It would be helpful to know specifically which types of PFAS are being used on the site, at the very least by sub-class, to determine whether these technologies are effective at removing the respective PFAS present in wastewater.

A recent publication by [Chen et al. 2024](#) reported the detection of various fluorosurfactant byproducts and reaction products in chip fabrication wastewater. These included perfluorobutane sulfonamido ethanol (FBSE) and its various derivatives. In total 83 different PFAS were detected including 29 newly discovered compounds likely formed from the various chemical and physical processes involved in semiconductor manufacturing. It's clear semiconductor manufacturing generates its own unique set of PFAS, which will require a specialized approach to wastewater and environmental protection. These types of PFAS are outside the scope of recent regulatory restrictions on water quality and are currently only subject to federal disclosure requirements.

Micron states that some of these WWT technologies would transform certain PFAS into "less harmful, shorter chain PFAS". The fluorochemical industry has been promoting this nonsense for years, but the scientific literature contradicts this notion. Shorter chain PFAS are *not safer* and promotion of this assumption has resulted in regrettable substitutions in many industry sectors (e.g. firefighting foams). The following is a sample of resources indicating that shorter chain PFAS pose similar health concerns and are, at best, understudied:

- Ateia et al. 2019 <https://doi.org/10.1016/j.chemosphere.2018.12.186> - Review the available literature which found that short and ultra-short PFAS are difficult to remove from wastewater, are increasingly detected in the environment, and remain largely under-studied with regards to their transport and impact. **The authors state that conventional water treatment technologies are not likely sufficient to remove these types of PFAS from wastewater streams.**
- Kwiatkowski et al. 2020 [ref: <https://pubs.acs.org/doi/10.1021/acs.estlett.0c00255>] - Propose the scientific basis for managing PFAS as a class, which includes shorter chain PFAS. Mounting evidence suggests that short chain and ultra-short chain

PFAS are not less harmful to environment as they are still highly persistent and mobile, as well as understudied compared to PFOA and PFOS.

- The National Toxicology Program (NTP) published studies in 2019 (revised 2022) which found that both long and short-chain PFAS affected the liver and thyroid in tested animals, although higher doses of the shorter-chain PFAS were needed to elicit similar effects. [ref: https://ntp.niehs.nih.gov/research/topics/pfas?utm_source=chatgpt.com]
- The European Chemicals Agency (ECHA) continues to develop regulations that would restrict PFAS as a class with only a few notable derogations. These regulations approach their actions on the assumption that all PFAS are harmful to human health and the environment as per the precautionary principle. [ref: <https://echa.europa.eu/registry-of-restriction-intentions/-/dislist/details/0b0236e18663449b>]

It is disappointing that Micron is working on such faulty and outdated assumptions concerning one of the most notorious pollutants in the 21st century. This does not inspire confidence that Micron has the best interests of the local community and quality of the water we are graciously providing to expand its business. If not properly managed, the PFAS used at these chip fabs could seep into water, sediment, and soil, causing expensive and time-consuming remediation and harmful exposures to the public. Under our “polluter-pays” regulatory structure, the public may have to wait decades for remediation, restoration, and compensation for any damages. We’ve experienced this with the Onondaga Lake clean up, and I personally don’t want to see this happen again at Micron.

Certain technologies using materials like activated carbon would also contribute to the generation of hazardous waste, as the activated carbon, or other treatment materials, becomes contaminated with the removed PFAS and other hazardous chemicals. A large amount of uncertainty surrounds the efficacy of PFAS hazardous waste disposal. EPA’s current interim guidance suggests that disposal options are limited to only certain methods like incineration (at capable facilities only, not municipal incineration), hazardous waste landfill, and or underground injection, and only if these facilities meet certain testing requirements. It cannot be assumed, for example, that any hazardous waste incinerator can completely incinerate PFAS. [Ref: <https://www.epa.gov/system/files/documents/2024-04/2024-interim-guidance-on-pfas-destruction-and-disposal.pdf>]

What is Micron's plan for ensuring that additional hazardous waste generated during water treatment is properly disposed of and does not impact the local or regional environment?

Micron acknowledges where PFAS are used but does not disclose the types of PFAS that will be used on site -surfactant-based PFAS, fluoropolymers, soluble, insoluble? Micron states that they will require vendors to disclose chemical constituent data, but this can be difficult even under NDA. Suppliers are not legally mandated to provide information that compromises their intellectual property. What is Micron's vendor chemical disclosure policy for chemical suppliers? Will Micron not purchase from a supplier that is unwilling to provide adequate chemical disclosure? These disclosures are paramount to adequately managing risks from wastewater and worker health.

Micron's stance on PFAS substitution is similar to that of the [Semiconductor Industry Association](#): there are no known substitutes for PFAS in semiconductor manufacturing. Substitution will require extensive re-designing of their processing facilities. They claim that substitutes may be as far as 25 years away. However, there has been fruitful work from a fellow chip manufacturer that challenges this statement. Transene partnered with academic researchers at UMASS Lowell to develop alternatives to safer etching solutions without the need for PFAS. According to the published, peer-reviewed article released in 2023, these safer etching solutions were tested at ca. 100 facilities without any reports of reduction in performance. (Ref: <https://transene.com/wp-content/uploads/PFAS-Article.pdf>)

What is Micron's plan for finding PFAS alternatives and what is the expected timeline for substituting PFAS in its fabrication facilities? Are they acquiring strategic partnerships to develop resources? Are they doing active testing and piloting alternatives? What is the likelihood that the fabs planned for later development in Clay will be designed without the need for fluorochemicals?

P 3-240

Micron acknowledges that PFAS analytical methods are still under development and there are only validated methods to detect ca. 40 of 10,000 PFAS available. How likely are these 40 methods to adequately detect the type PFAS that will be used at the Clay facility? How can the facility be sure they are adequately removing PFAS at their IWWTPs if there are limited analytical methods available? How can they meet the regulatory monitoring requirements under SPDES and other authorities to ensure the local surface water is protected?

Micron should consider using analytical screening methods that detect total organic fluorine (TOF) and other non-targeted screening methods in wastewater effluent. These methods do not detect specific types of PFAS but qualitatively detect the presence of any

PFAS. While these methods are still being standardized, they represent the best methods currently available to monitor PFAS in many environmental media.

Micron mentions NY drinking water limits for PFOS and PFOA, but these are not likely to present anyway as C8 and C10 fluorochemicals were voluntarily phased out of the market. Micron should clarify that most drinking water standards currently in place manage only a small subset of PFAS.

Micron should clarify whether these drinking water standards would protect the public from the PFAS expected to be used on site. What is Micron's plan to ensure that their wastewater treatment technologies will exceed regulatory standards, particularly with regards PFAS and other under-regulated hazardous materials?

The TRI reporting rule was also mentioned. Will Micron be exempt from these reporting standards when they are operational? If not, and Micron will likely have to disclose the PFAS used at this facility once it's operational. Then why not disclose this now to the public?

From: Kellogg, Syd <kellogcd@lemoyne.edu>
Sent: Friday, August 1, 2025 3:49 PM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Extend the comment and review period on Micron's DEIS

Dear whomever it may concern,

As a constituent of Central New York and Onondaga county, who will be affected by Micron's presence in the area, I oppose the project's arrival and demand that you make necessary accommodations to combat the project's proposed damages to the environment and community before starting construction. As outlined in the 2,000 page document, that you have only allowed the public 45 days to read and comment on, Micron's arrival will bring unnecessary and costly challenges to the surrounding areas: air and noise pollution, water consumption and contamination, and destruction to rare wildlife. These are problems the people of Central New York, and Syracuse specifically, already face on top of issues of lead poisoning in public water systems, homelessness and poverty. These issues must be addressed first, if you wish to see economic prosperity for the region. Giving the people a chance and a better future will strengthen and grow the region better than any project or corporation will, especially when that corporation is projected to do more harm than good. Micron's proposed benefits will not reach the community in the next few years, as Micron will not even be fully built in that time, however, the communities tax money and resources will be used for the creation of Micron. In the time it takes Micron to be built and for "prosperity" to emerge, these resources could be used instead to address some of the problems listed above, and will have a greater benefit on the community. This is what the people want. I am sure if you extend the comment period on the DEIS to 120 days and allow more public hearings for the public to comment on the plan, you will see that the public does not want Micron here, or at least requires accommodations to be met before Micron's implementation. I urge you to make these considerations and to hear out the voices of the people before moving forward on this project. It is in your best interest.

sincerely,

--

Syd Kellogg - (They/Them)

Le Moyne College 26'

B.A. Communications

Peace Action Le Moyne | **President**

PRISM | **President**

From: Camille Marcotte <ctmarcot@gmail.com>
Sent: Sunday, August 3, 2025 8:05 PM
To: chipsnepa@chips.gov
Subject: [EXTERNAL] MICRON Draft EIS 2025 Comments
Attachments: Micron Comments_August 3 2025.pdf

To: CHIPS Program Office and OCIDA

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. I advocate for an extension of the comment period from 45 days to 120 days (October 25, 2025), and to hold additional public hearings beyond the one held on July 24 to include additional in-person and virtual hearings. The 20,000-page DEIS is a lengthy report that takes time to read and fully understand. Given the size and impact of the Micron project, it is important that the public have ample time to read the report.

I want to highlight key environmental, social, and economic impacts and mitigation measures, which are insufficiently addressed in the DEIS.

I urge consideration and response to the following issues and concerns:

Water and Ecological Resources: The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.

Furthermore, Micron must not pollute our air, soil, fish & wildlife, and drinking water with any of the hundreds of chemicals used in their production process, including toxic ones such as PFAS ("forever chemicals"). There are currently no easy and cost-effective means of removing PFAS from our environment. Thus, preventing PFAS pollution in our communities is vital.

While Micron proposes to create more wetlands than it destroys, restored wetlands are rarely as effective or biodiverse as original wetlands. Restored wetlands seldom replicate the important functions of natural wetlands and can take decades to reach peak functionality. With the potential restored wetlands being upstream of Micron, they will not mitigate flooding caused by Micron's development. Lastly, the proposed wetland replacement ratio could be higher, especially considering the lower functionality of created wetlands compared to natural wetlands.

Protection of Air, Water, and Workers: A good job is a safe job. The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect workers' health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols. In addition to workers, Micron must commit to keeping workers' families and community members safe from toxic chemicals by implementing state-of-the-art health and safety protocols, especially from exposure to large quantities of toxic chemicals used during production.

Greenhouse Gases: The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar –and without relying on renewable energy credits or using renewable energy that is already on the grid – to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

In past presentations, Micron promises to use “state-of-the-art technology” to mitigate greenhouse gas emissions and claims they “aim to achieve zero waste to landfill.” However, no specifics are offered as to the technology that will be used to mitigate and control greenhouse gas emissions. Furthermore, no details are provided on how Micron plans to achieve zero waste to landfill. These are great ideas in theory, but the lack of specifics makes them empty promises.

Job Access, Housing & Transportation: The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Micron must commit to measures such as pay equity and transparency, fair schedules, childcare and other supportive services, inclusion and anti-bias training, and protections against discrimination and harassment to ensure accessibility for and retention of women, people of color and other marginalized populations. Micron must also commit to ongoing training and professional growth of employees to ensure equitable promotion and advancement in a highly technical work environment. Micron must guarantee that a meaningful percentage of new hires come from marginalized local communities, particularly within the City of Syracuse, so that those who need good jobs the most have access to them. Micron must create a workforce development process focused on census tracts with the highest concentration of poverty in the CNY region.

Furthermore, the DEIS does not sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Additionally, the impact of a larger population and need for more housing mean that land costs will increase. This will further exacerbate the affordable housing crisis. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed-income, affordable, climate friendly, and safe housing while protecting the affordability of existing housing for current residents.

Social & Cultural Impacts: Connection to water is culturally important to many living in the Central New York region, including the Onondaga Nation. The Onondaga Nation has worked so hard to protect our local waterbodies, and fight for cleaning up waters that non-indigenous communities have destroyed. Almost everyone in the Syracuse-area knows the story of Onondaga Lake, and its legacy of extreme pollution caused by companies.

While some improvements have been made to Onondaga Lake's water quality, I fear we have learned nothing from the whole experience by allowing Micron to come into the region. We have already seen what happens when companies pledge to protect water resources and fail – do we want a repeat of Onondaga Lake?

Thank you for your consideration of my comments.

Sincerely,

Camille Marcotte

August 3, 2025

To: CHIPS Program Office and OCIDA

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. I advocate for an extension of the comment period from 45 days to 120 days (October 25, 2025), and to hold additional public hearings beyond the one held on July 24 to include additional in-person and virtual hearings. The 20,000-page DEIS is a lengthy report that takes time to read and fully understand. Given the size and impact of the Micron project, it is important that the public have ample time to read the report.

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members safe from toxic chemicals by implementing state-of-the-art health and safety protocols, especially from exposure to large quantities of toxic chemicals used during production.

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protect our local waterbodies, and fight for cleaning up waters that non-indigenous communities have destroyed. Almost everyone in the Syracuse-area knows the story of Onondaga Lake, and its legacy of extreme pollution caused by companies. While some improvements have been made to Onondaga Lake's water quality, I fear we have learned nothing from the whole experience by allowing Micron to come into the region. We have already seen what happens when companies pledge to protect water resources and fail – do we want a repeat of Onondaga Lake?

Thank you for your consideration of my comments.

Sincerely,

Camille Marcotte

From: Dean Powell <deanpowell929@gmail.com>
Sent: Sunday, August 3, 2025 5:12 PM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Comments on Micron report

Hello,

I believe adding Micron to CNY will overall be a positive addition to the region even though there will be some minor environmental and economic changes we have to work through.

I fully support the work your doing bringing Micron to area.

Thanks,
Dean Powell
4689 Manor Hill Dr, Syracuse, NY 13215
603-667-6539

From: Raymond D'Hollander <ray.dhollander@gmail.com>
Sent: Monday, August 4, 2025 5:30 PM
To: chipsnepa@chips.gov
Subject: [EXTERNAL] Micron Draft EIS 2025 Comments

Submitted by Raymond D'Hollander, P.E., 7887 East Ridge Pointe Drive, Fayetteville, NY 13066

General Comments

I strongly support the Micron project. I believe it should move forward this fall with only minor tweaks to the Draft Environmental Impact Statement (DEIS). In general, the DEIS is thorough and provides sufficient detail to assess the project for decision-making. I have not identified any fatal flaws or significant gaps.

I note that most aspects of the project will have a specific permitting step where detailed plans will be reviewed for regulatory approval prior to implementation of that construction phase. Since the project will be in construction for two decades and then in operation for several decades after that with periodic permit renewals during operations, I assume there will be future regulatory changes and technology evolution that will need to be incorporated into the design and operation of those project phases.

The comments below are relatively minor and focus on environmental impacts that Micron has direct control over. Many of the environmental impacts assessed in the DEIS are not under Micron's control, such as transportation improvements, off-site power suppliers, induced economic growth, and housing developments. The DEIS does an excellent job of providing information for awareness of the basis of what needs to be addressed. Resolution of those impacts will need to be done through the local and state political processes.

In general, I believe that the environmental regulations for wetland and bat habitat mitigation, and stormwater management should be followed without waivers for Micron and other developments such

as housing, industry, and commercial. Our biggest current surface water quality impacts generally come from agricultural runoff now that there is a high degree of sanitary and industrial wastewater treatment such as proposed for the Micron project. I strongly support NYS permitting more renewable energy sources.

Section Specific Comments

Section 2.1.1.2 – This section states that there will be 445 acres of tree clearing and grubbing at the Micron site. Consideration should be given to saving a significant number of cleared trees and stumps for reuse in the wetland and stream mitigation activities to be executed concurrently. Incorporation of downed wood and large woody debris features in ecological restoration is very valuable, particularly since it takes decades to grow trees of the size that will be cleared. Stumps and root wads are very useful in ecological restoration and will be available due to the grubbing required as part of the Micron site clearing. Rot resistant trunks with root wads (e.g. hemlock) are particularly valuable in stream restoration as they can provide benefits for decades. Stumps and root wads are generally not available from commercial logging operations because they increase soil disturbance which is not desirable. The cleared wood is near the wetland and stream mitigation sites, so it also reduces the potential impacts of disease and insect movement that could occur if woody debris were brought from other sites further away.

Section 3.3.4.2 – This section states that the permanent stormwater design will meet the *New York State Stormwater Management Design Manual* (NYSDEC 2024) requirements. Since the design and construction phase will extend over two decades, I suggest amending this sentence to commit to meeting the requirements of the design manual version in effect at the time of the design of each phase of permanent stormwater features. It is likely that this would be required anyway as part of the NYS permitting process for later phases of the project. Hopefully, NOAA Atlas 15 will be completed in the next few years which will likely prescribe greater stormwater intensities for design.

Section 3.3.4.2 - This is a very large project with a lot of impermeable area. Much of the development in this watershed occurred before implementation of stormwater detention requirements and has led to increased flooding potential. Current development projects are opportunities to create additional stormwater detention. The *New York State Stormwater Management Design Manual* recommends designing stormwater detention in permanent features for a 100-year, 24-hour storm. I suggest that the Micron project target creating more extended stormwater detention in ponds where space allows without increasing the limits of disturbance, say for the 1,000-year, 24-hour storm or the upper bound of 100-year, 24-hour storm predicted range which would be an additional 1.5 to 2 inches of precipitation in the current NOAA Atlas 14 predictions. This provides buffer for the very large intense events and would also likely cover some of the changes that will likely occur in the upcoming NOAA Atlas 15. If open space is available, creating additional extended stormwater detention is inexpensive during the initial construction compared to attempting to retrofit existing facilities.

Section 3.3.4.2 – I suggest that emergent wetland and pond portions of the wetland mitigation areas be designed to provide extended stormwater detention for at least the 100-year, 24-hour storms for the watershed of the wetland mitigation area since those are largely being constructed in farmlands that have likely been augmented with ditches to expedite stormwater drainage. Creation of vernal pools in the forested wetlands would also count towards these retention volumes.

Section 3.13.4.2 4th paragraph – This paragraph states that there will be 50- to 100-foot-wide landscaped buffers with perennials, shrubs, and trees. Micron should commit to predominantly native plants in these buffers along the roadway as these will be important migration corridors of insects, birds, and animals along the edges of this large property as well as providing habitat. Douglas Tallamy and others have documented the substantial impact to wildlife ecology when non-native plantings replace native plants. It is still possible to have functioning ecosystems around industrial plants and subdivisions simply by providing significant native plantings. Similarly, Figure 2.1-5 shows 17 separate stormwater management practice areas. These stormwater management practice areas are also excellent locations to establish native emergent marsh and floodplain plant species that will both improve stormwater discharge quality and provide ecological habitat on the Micron site. The nature of these areas will depend on their design as dry basins or wet detention ponds, but the areas are large enough that they could support numerous species of migratory birds in either scenario. Some of the underlying soils are clay, so it is likely that at least some of the ponds will end up being wet ponds, whether intentional or not.

Section 5.1 Water Resources – Unfortunately, large projects such as this invariably severely impact valuable water and other resources, often by paving them over. Historically, these resources were lost forever. However, laws and regulations over the past half-century have required mitigation of these impacts. Large projects like this require large mitigations which create opportunities for large contiguous area mitigations that are simply not possible for small projects. It is good to see that proposed mitigations in Appendix F are generally large contiguous areas for either permanent protection or construction of mitigation features.

Section 5.1 – Biological Resources – Much of the loss of habitat for the threatened and endangered species listed has occurred one farm or housing lot at a time in the region. Small landowners, such as farmers and homeowners, have limited resources and poor nursery availability of critical species that could be planted on their properties, such as shagbark hickory. These large restoration and mitigation projects provide a valuable opportunity to plant a significant quantity of difficult-to-source materials, such as shagbark hickory. These valuable species should be identified and prioritized for inclusion in the plantings, or they will slowly dwindle in the region as other properties get developed. Waiting for squirrels and blue jays to plant them is a very slow process if there aren't any nut-producing trees within a few hundred yards.

Appendix F-7 Compensatory Mitigation Plan – I suggest adding shagbark hickory into the Red Maple Hardwood swamps to provide future high quality live tree bat roosting sites. Shagbark hickory should also be incorporated into other forest development areas, such as wetland buffers and streambanks.

Appendix F-7 Compensatory Mitigation Plan - Considering that many of the large contiguous areas requiring mitigation within the Micron site are impacted by invasive species, this project provides a rare opportunity to generate high quality large contiguous areas focused on specific wildlife species that are generally not accommodated by smaller mitigations. In particular, grasslands in this region tend to undergo succession to woodlands in the absence of a wildfire cycle. A commitment to creating and maintaining some areas as large contiguous grasslands (>50 acres in size) and preventing woodland succession will be valuable for species that require large grassland plots to maintain breeding populations.

From: Tim Dunlavey <flattop71@gmail.com>
Sent: Monday, August 4, 2025 1:31 PM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Truck traffic Caughdenoy Road.

Question what will be done to eliminate truck traffic getting off 481 onto Caughdenoy road at the Caughdenoy exit? Seeing this part of Caughdenoy road runs thru the center of several housing tracks with many people who run or bike down Caughdenoy road or Maple Rd? Will trucks delivering supplies (heavy equipment, stone , or fill and building materials) be forced to use route 31 from 81 in Cicero or from 481 to 31 in Clay?
Sent from my iPhone

From: Chigger <chigger@a-znet.com>
Sent: Monday, August 4, 2025 8:09 AM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Comment, bird migration: Micron development New York State

Thank you for providing the opportunity for the public to comment on the proposed Micron chip building facility. A concern is the lighting at the proposed facility location may negatively impact wild bird migration, including song birds. Artificial lighting can negatively impact birds in flight. This is a recognized concern as evidenced by “lights out” media messaging during spring migration, March 1 to June 15, and fall migration, August 15 to November 30. Agencies supporting “lights out” to aid bird migration include Audubon Society, New York State Department of Environmental Conservation, New York State Office of General Services. Target audiences of such messaging includes “home” and “business” and “State-owned and managed buildings”. Will Micron support “lights out” to protect migrating birds and, if so, what is the planned methodology for doing so?

Respectfully,

JoAnne Oliver
2025 Pompey Center Road
Fabius (Onondaga County), New York 13063

From: Les Ryon <ryon1051@gmail.com>
Sent: Monday, August 4, 2025 8:08 PM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Micron Public Comment
Attachments: DEIS public comment.docx

Please see attached

John L. Ryon, III
Karen L. C. Ryon
305 Pleasant Street
Manlius, NY 13104

Onondaga County Industrial Development Agency
Attn: Micron Project
335 Montgomery Street, 2nd Floor
Syracuse, NY 13202
CHIPSNEPA@chips.gov

8/4/2025

To Whom It May Concern:

We would like to begin our comment by stating we are in favor of the Micron Project. However, considering the scope of the project we would appreciate;

1. More time for public comment before advancing to the EIS, not necessarily into October but an extension, nonetheless,

2. Much clearer and specific mitigation measures to be taken addressing;

a. Streams, rivers & lakes degradation

b. Water waste/industrial waste minimization

c. PFAS control (where will the ~ 100,000,000 tons of PFAS go), asphyxiants, spills (55 million gallons on-site, hazardous waste)

d. Utility use & who pays for how much, since we will become a "load pocket" vs. supplier?

e. Heat Island Affect (i.e., parking for 12,000 cars, in conventional parking lot = 15-20 acres of asphalt). Stacked structure to reduce footprint?

f. Wildlife & endangered species – protection?

g. Why use only fossil fuels? Wind? Solar?

h. Wetlands – typically take decades to recover.

We have both held various positions in our local Village government. We had a 140 acre parcel of land slated for clear cutting for development re-designated as a CEA. Karen was ZBA Chair & member & chair of our Planning Board. We became familiar with (albeit modest comparatively) DEIS documents. It became apparent that size and volume became somewhat of a technique to distract.

We are thoroughly impressed with the skilled professionals who took on the challenge of 20,000 pages. They spoke clearly and succinctly regarding some of our concerns mentioned above.

It would be interesting to compare documents with their other sites in Manassas, VA & Boise, Idaho. We discovered that a former applicant to our Planning Board used statistics from an entirely different site with nothing similar.

We know that Micron has the skill and capability to clearly, simply address these concerns without the immense volume of pages. Our area is blessed with ample, clean, fresh water. The Great Lakes hold roughly 20% of the world's surface freshwater. Let's keep our water & air clean and safe for generations to come.

Thank you for your consideration.

Sincerely,

The Ryon's

From: sonia kragh <soniakragh@gmail.com>
Sent: Tuesday, August 5, 2025 10:32 AM
To: chipsnepa@chips.gov
Subject: [EXTERNAL] Micron DEIS review

Please accept these comments and recommendations from Climate Change Awareness and Action, Inc. Please note that I will be submitting additional comments on behalf of other Dewitt Advisory Conservation Commission and myself using this email. All should be considered independently. Thank you, Dr. Sonia Y Kragh, MD

 DEIS response from CCAA Sonia edit

Respectfully accept these comments and suggestions for mitigation from the board members of Climate Change Awareness and Action, Inc.

We are writing in response to your request for the Central New York Community to respond to the Draft Environmental Impact Statement (DEIS) related to the Micron Project proposed for the Syracuse area.

We are Climate Change Awareness and Action, Inc.(CCAA). We organized 10 years ago for the purpose of educating others and actively working towards reversing the human caused climate disruption that threatens the earth. We are a local 350.org group, centered in Syracuse, New York.

Our mission is to reduce the amount of greenhouse gases in the atmosphere through individual and community education and action while supporting fair and just public policies and legislation. It is in this vein that we are responding and commenting. Specifically, we are referencing Chapter 3.7 (3-183-3-215), Greenhouse Gas Emissions (GHG), Climate Change, and Climate Resiliency.

Your lead statement references:

"The effects of climate change are driven by the combined emissions from various sources across the globe, rather than from any single event or emission. Each contribution, whether large or small, adds to the overall warming of the planet. As such, when assessing the impact of a specific project, it is essential to consider how its emissions across alternative scenarios (including a scenario with no project) fit in relevant context into broader global and regional emissions, its contribution to the ongoing accumulation of GHGs in the atmosphere, and how the project and alternatives may impact climate commitments and goals. This approach allows an agency to present the environmental and public health effects of a proposed action in clear terms and with sufficient information to make a reasoned choice among the alternatives and consider appropriate mitigation measures. This section describes the environmental setting of the Proposed Project, and assesses, to the extent practicable, GHG emissions from the semiconductor industry broadly and, more specifically, from the Proposed Project alternatives, and considerations of ongoing climate change effects."

This statement acknowledges the DEIS attempt to include many relevant concerns about the Proposed Project, but fails to address the impact of Connected Actions on GHG emissions and Climate Change. The net finding of the DEIS is that there will be harmful impact to Climate change from the Proposed Project construction and operations. These will be commented on separately below.

Proposed Project:

1. The boundaries set to analyze greenhouse gas emissions at the construction site seem arbitrary and the radius unlikely to capture the plume of emissions resulting from GHG emissions during construction and operations. The Environmental Justice (EJ) Screening Tool on the Environmental Protection Agency website is not operational under the current federal administration. This is a key "real time" monitoring tool used by the public and science community to determine what is happening in our region related to emissions and climate change, as well as other environmental effects from the Proposed Project.

Recommend:

1. Repeat the GHG assessment using a 5 mile radius from the center of the Proposed Action. Modify monitoring sites and frequency based on this new radius.

2. Restore the EJ screening tool on the EPA website. If not possible, ask that NYSDEC develop an EJ screening tool with the same parameters and data as was available on the federal EPA site.

3. As part of GREEN CHIPS legislation which is funding Micron, they are required to achieve 100% renewable energy for electricity use. The DEIS is vague on the source of renewable energy, listing solar on some buildings. Currently we are concerned that the Micron Proposed Project plans to draw from existing hydro, solar, wind, and nuclear sources. These energy sources are barely adequate to support existing developments and communities. (According to the Climate Leadership and Community Protection Act (CLCPA), nuclear energy is a non-carbon energy source, and is a non-renewable energy source.)

Recommend:

- a. Transparency related to proposed renewable energy sources to support electricity involved in building and operations of the Proposed Project. (Consider hydro, solar, wind, geothermal, biofuels as clean renewable energy.) Introduce clean renewable energy at the beginning of the project and throughout the project, including new technologies as they emerge. These should be independently sourced and funded by Micron and not regional or state taxpayers. The information provided is that carbon free electricity will be needed equivalent to 2 million households or 2 billion kilowatt hours per year.
- b. What is the timeline for the achievement of 100% renewable energy electric that does not rely on the current electric grid renewable energy sourced in Central New York?
- c. Look at electric battery storage instead of diesel generators for back up sources of energy

4. The DEIS lists natural gas as the energy source to operate the 4 fabs in an amount equivalent to run 107,000 households. Fossil fuel is not a renewable energy source. The DEIS has concluded that GHG Emissions will have a negative impact on climate change.

Recommend:

a. Is natural gas the only possible fuel to operate fabs? As technology evolves and each phase of construction occurs, Micron should commit to reassess the possibility to use

renewable energy to operate the fabs and thereby reduce GHG emissions as part of climate resiliency and mitigation of climate change. The Climate Leadership and Community Protection Act is clear that a transition to renewable energy is required to lower greenhouse gas emissions and reverse and mitigate climate change.

b. Can biofuels or other alternatives such as anaerobic digestion be used in part or 100%? State University of New York Environmental Science and Forestry, located in Syracuse, NY, has a biofuels program using willows, so biofuels could potentially be sourced locally. See #6 below, Food scraps regarding anaerobic digestion.

c. What mitigation is proposed to reduce emissions of greenhouse gas into the air?

d. When GHG emissions occur that have a negative effect on climate change, what financial or other penalty will Micron incur?

5. Natural gas used for other purposes is not clear. Operation of natural gas boilers is listed, and if this is for heating, is a source of carbon and greenhouse gas emissions that could be mitigated by choosing a renewable energy source for heating and cooling, especially with Micron committing to a carbon free future and 100% renewable electric.

Recommend: could cold climate heat pump technology be used in place of natural gas?

6. New York State has a House Energy Rating System (HERS) HERS is a widely recognized system for measuring a home's energy efficiency. It is the industry standard for assessing a home's energy performance and is often required for new construction and some renovations in many towns and villages.

Recommend: Conduct an energy rating assessment of current Proposed Action and adjust Proposed Action to comply with 2020 HERS guidelines which are minimum standards set for the state. Net goal for the state is set within the Climate Leadership and Community Protection Act and is net zero or negative carbon. Net-zero carbon – construction refers to achieving zero or negative carbon emissions during a building's construction, from product manufacturing to practical completion. This can be achieved through carbon offsets or by exporting on-site renewable energy.

7. Food Waste for a large facility construction and operations can be substantial. Food Waste becomes GHG Emissions which affects climate change. NYS has a Food Scraps Donation and Recycling Law, which will be expanding in 2027. <https://dec.ny.gov/environmental-protection/recycling-composting/organic-materials-management/food-donation-scraps-recycling-law>

Recommend:

a. Establish an on-site anaerobic digester, or composting facility during Phase I. Having a facility on site will allow for immediate disposal of food waste, and lessen hauling and generation of GHG emissions from hauling and landfills. If there is a composting facility, compost could be used on the landscape as part of mitigation. Anaerobic digestion could produce energy for the Proposed Action.

b. Establish a plan for food scraps donation, while keeping further GHG emissions from hauling food waste low.

c. Do the right thing by the community, don't wait to "measure" that you have to do this based on food waste mass.

8. Wetlands will be removed as part of the Proposed Action. All wetlands sequester carbon from the atmosphere. Removal of wetlands will result in GHG emissions from the demolition process, as well as destroy a source of carbon sequestration.

Recommend:

a. DEIS should include a GHG emissions inventory considering loss of wetlands and its impact on climate change. That assessment should widen the considered corridor as adjacent waterways/agricultural lands/forests will also be affected.

b. The Climate resiliency plan should consider details of all mitigation efforts related to loss of wetlands, including cascading effects to waterways/flooding, effects on GHG emissions, regional impact on flora and fauna, change in habitat to bats and other animals which could result in an increase in insects hazardous to health of people and other animals, , such as mosquitoes that carry diseases like eastern equine encephalitis and west Nile virus https://www.health.ny.gov/press/releases/2025/2025-07-22_west_nile.htm or insects that eat agricultural crops. Ultimately mitigation efforts of lost wetlands should result in net zero carbon or negative carbon.

8. Energy choices appear to have been made by Micron employed personnel.

Recommend: An Independent third party assess the Proposed Project for renewable energy source options and mitigation of Greenhouse Gas Emissions

9. DEIS and other information indicates that by the time the Proposed project is completed, there will be an estimated 5 million tons of greenhouse gas emissions.

Recommendation: What is the over time mitigation and climate resiliency strategy for these emissions that will cause climate change as admitted by the DEIS review? How will this be followed over the lifetime of the design, construction and operation of the Proposed Project?

10. Parking spaces are listed as 12,000.

Recommendation:

a. What are the greenhouse gas emissions and impact on climate change associated with filling these parking spaces to operate the plant?

b. Review the possibility of carport solar for all parking spaces as a renewable energy source on campus.

11. The DEIS public comment period of 45 days is inadequate to do justice to the size of this project.

Recommend: extend the comment period to 120 days as requested by numerous environmental organizations and the public.

12. Environmental impacts will be immediate and ongoing as a result of the Proposed Project. There are consequences and needed actions that are impossible to consider over the duration of the project, especially given how quickly technology changes.

Recommend:

a. Establish an advisory conservation council that includes local public experts in conjunction with Micron that meets regularly to review design, construction, operations throughout the life of the Proposed Project and its operation.

b. Request additional review open to public comments if there are any approval decisions requiring upgrades and improvements during buildout of Fab 1 and 2.

c. Request a rigorous supplemental DEIS review with public comment prior to the design and construction of Fab 3 & 4.

Connected Actions:

1. The Connected Actions DEIS review established corridors to assess environmental impact that do not capture the reality of GHG emissions being in the air and "mobile". The connected actions include rail spurs, highway interchanges which will require extensive transportation during demolition, construction, and eventual operations. Secondly, because of the large employment at the facility, there will be additional environmental impacts from daily transportation, and building of necessary housing and support. The Environmental Justice (EJ) Screening Tool on the Environmental Protection Agency website is not operational under the current federal administration. <https://ejscreen.epa.gov/mapper>.

This is a key "real time" monitoring tool used by the public and scientific community to determine what is happening in our region related to emissions and climate change, as well as other environmental effects from the Proposed Project. A temporary and incomplete private site does not contain adequate data on the Connected Action corridors. <https://pedp-ejscreen.azurewebsites.net/>. What data is there, indicates that Syracuse is already in the 95-100% level on toxic releases to the air, and that Clay-Dewitt corridor along Highway 481 is 50-90% depending on location. This is before the I-81 diversion to 481 that will increase traffic on Highway 481.

Recommend:

a. Repeat the GHG emissions assessment using a 5 mile radius from the center of all Connected Actions. Modify monitoring sites and frequency based on this new radius. Reassess annually and after each phase. After reassessment, Generate recommendations about energy sources in order to further lower GHG emissions to mitigate climate change.

b. Restore the EJ screening tool on the EPA website. <https://ejscreen.epa.gov/mapper>. This will allow the public and environmental groups and scientists to remain fully active in the process throughout the Connected Actions construction. If not possible, ask that the NYSDEC develop an EJ screening tool using the same parameters and census data that was on the EPA website

2. Rail Spur Connected Action -

- a. What is the projected environmental impact/GHG emissions from the operation of 60x60x60 rail cars daily to build Micron?
- b. What fuel will be used in this process?
- c. What monitoring is proposed?
- d. What will be the projected rail traffic pattern related to Micron in terms of volume of rail cars, time of operations, GHG emissions from the Rail Spur Connected Action travel to and from the CSX Dewitt Rail Yard East End , 434 Ellis St, Syracuse NY 13210?
- e. What is the impact of Rail Spur construction on wetlands/other surface water using the 5 mile radius? See discussion of wetlands above
- f. What are the plans to use non fossil fuel options to reduce GHG emissions?

3. Highway Interchanges -

- a. What are the projected GHG emissions related to construction and daily traffic at each new Highway interchange that is being built as a Micron Connected Action? Include as much detail as possible.
- b. What is the impact of Highway interchanges construction on wetlands/other surface water using the 5 mile radius? See discussion of wetlands above
- c. What are the plans to use non fossil fuel options to reduce GHG emissions?

4. Electricity conduit -

- a. What are the projected GHG emissions related to construction and management of new electricity conduits?
- b. What is the impact of electricity conduit construction on wetlands/other surface water using the 5 mile radius? See discussion of wetlands above
- c. What are the plans to use non-fossil fuel options to reduce GHG emissions?

5. Water conduit

- a. What are the projected GHG emissions related to construction and management of new water conduits? What is the energy consumption to move the water used in Micron building and operations?
- b. What is the impact of water conduit construction on wetlands/other surface water using the 5 mile radius? See discussion of wetlands above
- c. What are the plans to use non-fossil fuel options to reduce GHG emissions?

6. Natural Gas conduit

- a. What are the projected GHG emissions related to construction and management of new natural gas conduits?
- b. What is the impact of natural gas conduit construction on wetlands/other surface water using the 5 mile radius? See discussion of wetlands above
- c. What are the plans to use non-fossil fuel options to reduce GHG emissions?

7. Energy choices for connected actions appear to have been made by Micron employed personnel.

Recommend: An Independent third party assess the Connected Actions for renewable energy source options and mitigation of Greenhouse Gas Emissions.

8. There are 12,000 parking spaces at the Proposed Action location. What is the expected traffic and patterns and the expected Greenhouse Gas Emissions of that traffic? What effect on climate change will there be from that traffic?

In summary, the Micron Project is vast. All aspects of the lives of Central New Yorkers will be impacted. We have just scratched the surface of some of the issues that still need to be addressed, focusing on the responsibility that Micron bears in view of the climate policies and laws of New York State.

As part of the GREEN CHIPS legislation championed and signed into law by Governor Kathy Hochul, Micron will be required to manufacture semiconductors under leading-edge sustainability commitments designed to mitigate its greenhouse gas emissions and environmental impact, including utilizing 100% renewable energy, attaining LEED Gold status, and committing to greenhouse gas emission targets and reporting. In addition to Micron's responsibility to follow the letter of the law, it is also the responsibility of New York State to monitor and enforce its own stated environmental laws and policies. NYS is one of the few states that has an Environmental Amendment to the Constitution. We take it seriously. Thank you for your prompt and thorough attention to our review and comments.

Each person shall have a right to clean air and water, and a healthful environment.

Climate Change Awareness and Action, Inc.

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From: David Miller <zzzdavemiller@gmail.com>
Sent: Tuesday, August 5, 2025 2:02 PM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Support of Micron Development

To whom it may concern,
I am writing to provide my very strong support for the Micron project. I believe that this is a transformative project that will positively impact the area for years to come.

I was a founder and owner of the company JADAK Technologies in N. Syracuse and our goal was to grow to provide good paying jobs and to attract highly qualified technical people to the area. While we had much success Micron will dwarf this and provide what we had always wanted to achieve.

I understand that there are wetlands involved however because of the new wetlands law the state has already added over 1 million acres of wetlands to their informational maps. The tradeoff of 200 acres of wetlands for a development such as this should be a non-factor.

I sincerely and strongly support this project and hope it goes forward.

Warm regards,
David Miller

From: David Babcock <dave.babcock21@gmail.com>
Sent: Wednesday, August 6, 2025 1:50 PM
To: chipsnepa@chips.gov
Subject: [EXTERNAL] Comments from David Babcock on the Micron Draft EIS (OCIDA, June 2025)

From David Babcock, Liverpool, NY, 13090, dave.babcock21@gmail.com

These comments are directed to Micron or to the appropriate agency involved with the Micron Clay project.

D. Babcock Comments on the Micron Semiconductor Manufacturing Project, Clay, NY, Draft Environmental Impact Statement (OCIDA, June 2025)

A. A. Natural Resources

1. Given the habitat value and carbon capture capabilities of trees that will be removed during plant construction, for each tree cleared, provide funds to Onondaga Earth Corps, Onondaga Audubon, CNY Land Trust, and/or other qualified not-for-profit initiatives to plant an equivalent number of 3-foot tall or so trees within Onondaga County and/or Oswego County in proportion to the types of trees to be removed.
2. Evaluate whether any of the significant existing wetlands and mature trees on the Micron site designated for clearing and grubbing could be saved by constructing chip fabrication facilities around certain existing wetlands and forested areas on the site.
3. Document the basis for selecting the preferred wetland replacement sites.
4. What from the wetland mitigation plan is included to replace the 154 acres of palustrine forested wetlands? (DEIS Table F-1.)
5. Effectively construct, monitor, and maintain the proposed replacement wetland sites to maximize wetland functions and values consistent with the functions and values of the wetlands on the Micron site that will be destroyed. Long-term monitoring and maintenance would likely be done best under the supervision of the NYSDEC Division of Fish and Wildlife.
6. Include in plans to construct replacement wetlands the efforts to be conducted to plant and monitor-maintain suitable various wetland plants at the replacement sites. Otherwise,

aggressive, and potentially invasive plant species that thrive in wet areas could easily overwhelm other desired vegetation types at these replacement sites thereby resulting in a net long-term loss of overall wetland function and value.

7. In lieu of replacing the onsite wetlands, consider using funds otherwise needed to construct, monitor, and maintain replacement wetland sites to significantly enhance the function and value of nearby Hamlin Marsh and/or Cicero Swamp.
8. Hire one or more qualified, independently employed (third-party) Natural Resource Monitors (NRMs) for the site, its vicinity, and any natural resource replacement areas. The NRM needs to assess project impacts on natural resources, water quality, air quality, and effectiveness of resource replacement measures and long-term monitoring working with the most relevant NYSDEC scientists and engineers familiar with this project. The NRM needs to work on a regular basis and report primarily and directly to the most appropriate NYSDEC Division with headquarters in Albany.
9. Evaluate installing one or more horizontal passageways or tunnel-like structures for migrating animals along a typical migration path for these animals to traverse such as is done in many other developing areas.

B. Hazardous Materials and Their Management

1. Explain why the use of PFAS and PFCs are essential for Micron's chip manufacturing process and why alternative substances and chemicals are not to be used in their place. Also, justify the quantities of these substances and chemicals that are "essential" for Micron's manufacturing of chips.
2. Provide to an appropriate environmental oversight agency an inventory of all the chemicals to be used at the Micron Clay site along with projected annual use quantities, chemical formulations, and treatability assessments. Monitoring and management of less regulated chemicals leaving the plant site as sludge, water discharges and air releases is a significant concern. Monitoring needs to be regular and frequent (daily to weekly) depending on chemical usage and treatment fluctuations experienced.
3. The appropriate NY State agency and/or corresponding Federal agency need to work together with Micron and its competitor manufacturers of chips to identify alternatives to PFAS and PFCs that are less harmful to humans and the natural environment and, in the future if identified and marketed, agree to use PFAS and PFC replacement substances and chemicals if overall benefits exceed costs.
4. Specify how waste PFAS and PFCs are to be managed at the Micron site. Include a focus on recycling these compounds followed by partitioning the insoluble compounds not recycled to treatment sludge that needs to be managed to minimize adverse impacts. After one or more sludge disposal locations are proposed, an analysis of Environmental Justice needs to be conducted for that (those) disposal location(s). Any incineration of hazardous materials needs to include careful oversight by NYSDEC or an otherwise appropriate agency with reports to the public at least twice annually about treatment effectiveness and releases to the environment.

5. Hire a qualified, independently employed (third-party) Hazardous Materials Monitor (HMM) for the duration of this project. The HMM needs to work with appropriate NYSDEC professionals headquartered in Albany to assess project impacts associated with material management, waste management techniques, and wastewater treatment measures. The NRM can best report primarily and directly to the NYSDEC Division of Solid and Hazardous Materials or other particularly relevant division within New York State government.
6. Specify industrial wastewater treatment technologies to be used and their projected treatment efficiencies for each type of waste chemical being managed. Include how unknowns and uncertainties are factored into the wastewater treatment analysis, such as compositions of compounds not able to be measured.
7. Financially support research and pilot-scale applications warranted to better understand interactions of PFAS and PFCs with the natural environment as well as low-cost methods to treat and eventually eliminate need for their use.

C. C. Energy Use and Emissions

1. Hire a qualified, independent third-party professional or firm to provide an assessment of potential current and future renewable sources of energy available to Upstate New York compared to Micron's energy needs in Clay. This qualified professional should report to a qualified and authorized third party such as NYSERDA.
2. Evaluate the feasibility of tapping onsite geothermal energy available beneath the ground surface at or near the Clay site to help meet Micron's energy needs.
3. Evaluate placing additional solar panels on rooftops and/or on-the-ground at additional locations at and near the Micron plant site and support facilities to help supply local energy needs.

D. D. Site Development

1. Evaluate using porous pavement products for parking lot placement to reduce runoff and associated flooding potential.
2. Use construction materials formulated in ways that significantly reduce greenhouse gas emissions / carbon footprints.
3. How significant would daytime rail traffic be over each rail route during construction and during chip manufacturing operations? Many at-grade rail crossings exist within a few miles of the Micron site. Long waiting times at rail crossings will not be tolerated by the local public over the long term.

E. E. Environmental and Social Justice

1. Working with an appropriate government agency, establish an alternative Environmental Justice screening tool based, as appropriate, on USEPA's screening tool that can be applied by Micron in the next few years for its Clay operations.

2. Specify local hiring goals and ways to assure that local workers from various income levels are provided with job opportunities.
3. The Town of Clay and the Town of Cicero need to collaborate with each other to implement incentives for building affordable housing within a few miles of the Micron plant in Clay where lower-paid support workers and their household members could safely live.
4. Hire one or more independent (third-party) health and safety professionals trained in Micron's semiconductor fabrication processes to monitor worker health and safety and be allowed to interact with workers about health and safety protections.
5. Micron should not discourage chip fabrication workers from being able to unionize if they wish to do so. My father was a dues-paying union member which significantly assisted him with obtaining a livable wage, health care benefits, and safe working conditions which all workers and their families deserve.

F. F. Transportation

1. Evaluate the viability of providing an express bus service and/or a new rail line service between the CENTRO hub in Syracuse and the Micron Clay site. It seems using existing rights-of-way to route a new rail line along what is now Interstate Route 81 would reduce rail line implementation challenges.

From: cbieseme@twcny.rr.com
Sent: Wednesday, August 6, 2025 11:23 AM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] response to Micron's June 2025 DEIS

To Whom It May Concern:

Regarding the impending development of Micron's chip fabs near Cicero, NY, my main concerns are about the loss of the sustaining air, water and environmental quality upon which we and all life depends.

I was born in 1958 and grew up in Westvale, NY, close by Onondaga Lake, able to directly observe that poisoned body of water. My hope is that we have learned from that environmental disaster to be more prudent in the future, but the world has grown more complicated since it seemed like a good idea to dump untreated effluent directly into the lake for decades.

Although I may not live to see the long-term effects of Micron's operations, they, too, will doubtless not be good for the environment.

I ask that the gaps in mitigation plans pointed out by those who have studied the DEIS be seriously considered and thoroughly addressed.

Thank you.

Regards,

-Carol Biesemeyer

Camillus, NY

From: Jean Cooper <jwc7275@yahoo.com>
Sent: Wednesday, August 6, 2025 11:36 AM
To: chipsnepa
Subject: [EXTERNAL] Micron DEIS

Sent from my iPhone

Rodney Cooper
5009 State Route 31
Clay, NY 13041
August 6, 2025

Empire State Development
Attn: Micron DEIS Public Comments
633 Third Avenue, 37th Floor
New York, NY 10017

To Whom It May Concern,

My name is Rodney Cooper. I live at and own the property located at 5009 State Route 31 in Clay, New York, which is in close proximity to the ongoing construction related to the Micron semiconductor project.

I am writing to request clarification on whether my property or residence will be directly impacted by the construction or any future phases of this project. If there are plans that would affect my home—whether through road expansion, utility work, or other components—I would like to know when and how this may occur.

As a homeowner in the immediate area, I believe it is important to be informed of any potential disruptions or risks to my property and quality of life.

Thank you for your attention to this matter, and I request that my concern be addressed in the Final Environmental Impact Statement (FEIS).

Sincerely,
Rodney Cooper
5009 State Route 31
Clay, NY 13041

From: Anne Rhodes <outlook_3747C6A5EACA6D84@outlook.com>
Sent: Wednesday, August 6, 2025 5:01 PM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Micron DEIS

Dear neighbors at Onondaga County IDA,

I am concerned about the rushed comment period for the Micron microchip factory. The proposed manufacturing plan is huge, with lots of implications for all of us in NYS. What will be the impact on climate change? Will it fully comply with our CLCPA? What will be the effect on waterways and the lake, on communities nearby, on air pollution? How will it affect our NYSEG bills?

The Draft EIS is HUGE and full of technicalities in the appendices. Several groups that I am a member of want to understand what is being proposed and what the impacts will be, but we are struggling to wade through the hundreds of pages.

We The People need to weigh in on this project, because it is we the people who will be living with its impacts for decades to come.

We need more time. Please extend the deadline.

More people need to be informed and engaged, more understanding needs to be cultivated, we need clarity and an opportunity to suggest changes.

Please just do the right thing. Please don't just pay attention to the money. Pay attention to the people. US. Your neighbors.

We need you to work with us, not against us.

Thank you for your attention,

Anne Rhodes

91 Ed Hill Rd., Freeville NY 13068



Syracuse Metropolitan Transportation Council

126 N. Salina Street, Suite 100
Syracuse, New York 13202
Phone: (315) 422-5716
Fax: (315) 422-7753
www.smtcmpo.org

August 6, 2025

Onondaga County
Office of Economic Development
335 Montgomery St., Floor 2M
Syracuse, N.Y. 13202

Dear Sir or Madam:

Attached please find the Micron 2025 Draft Environmental Impact Statement comments from the Syracuse Metropolitan Transportation Council (SMTC). These comments are being submitted via postal and electronic mail.

Should you require any additional information, please contact me at (315) 422-5716 or jdagostino@smtcmpo.org.

Sincerely,

A handwritten signature in black ink, appearing to read "James D'Agostino", is written over a horizontal line.

James D'Agostino
Director

Attach.

The Metropolitan Planning Organization

Office of the Mayor • Syracuse Common Council • Syracuse Planning Commission • CenterState Corporation for Economic Opportunity • New York State Department of Transportation • New York State Department of Environmental Conservation • Empire State Development • New York State Thruway Authority • Office of the County Executive • Onondaga County Legislature • Onondaga County Planning Board • Central New York Regional Transportation Authority • Central New York Regional Planning and Development Board • Federal Transit Administration • Federal Highway Administration

The staff of the Syracuse Metropolitan Transportation Council (SMTC), as a SEQRA Interested Agency, respectfully submit the following comments on the Micron Semiconductor Manufacturing Project, Clay, NY, Draft Environmental Impact Statement (DEIS), dated June 2025. These comments are focused on the Traffic Impact Study included as Appendix M of the DEIS.

Text comments:

- Section 2.1.7.1: The SMTC's planning area no longer includes "a small portion of the Granby." (Removed with the latest MPA update in 2023, based on 2020 Decennial Census data.)
- Table 3-1: First column states that roadways are listed by jurisdiction. Why is Onondaga County not included as a jurisdiction? Caughdenoy Road, Verplank Road, Morgan Road, Henry Clay Boulevard, Soule Road, Bartel Road, Lake Shore Road, South Bay Road, and Thompson Road are owned by Onondaga County. Stearns Road and Hamilton Road are local (Town of Clay) roads. Bear Road between South Bay Road and Route 11 is a New York State facility. Circle Drive between Route 11 and the NY 481 ramps is owned by New York State, between the ramps and South Bay Road it is a local (Town of Cicero) road. See SMTC MPA Road Ownership map here: https://smtcmpo.org/wp-content/uploads/2019/05/MPA_Road_Ownership.pdf
- Section 3.4: It would be helpful to have a map/graphic summarizing the trip distribution.
- Section 4.3: How were the crash reduction statistics identified? What is the source of that analysis?
- Section 6.1.4: Is the North, South, East, West Interconnect project referring to the City of Syracuse's signal interconnect? Why is this relevant? This would not include any intersections in the Transportation Evaluation Area.
- Section 9.5.1: The sentence "The addition of the ramp from southbound Caughdenoy Road to southbound NYS Route 481 provides a more direct exit from the campus to the southeast" implies that it is Micron-generated trips that will utilize the new 481 SB ramp, but this would seem to run counter to the intent of the new access road and interchange that are part of Scenario B. A more likely explanation is that residents of the areas around Stearns Rd and Caughdenoy Rd would utilize this new 481SB on-ramp.
- Each of the mitigation scenarios (A, B, and C) is compared to the Preferred Action scenario but since the scenarios are additive it seems that it would be fairer to compare the incremental value of each mitigation scenario to the prior (less intensive) scenario, i.e B vs. A, C vs. B. Comparing Mitigation Scenario C to Mitigation Scenario B

shows little additional incremental benefit in terms of level of service and delay. Tables 9-13 and 9-10 show that three intersections move from LOS C/D to LOS E between Scenario B and Scenario C, although LOS F is mitigated at two intersections; overall, this seems like just moving some congestion around rather than actually mitigating overall issues.

Comments on sheet plans shown in Chapter 10:

General:

- Will all existing unsignalized side streets and driveways still have full access to Route 31? Some unsignalized intersections are shown in detail on the plan sheets, while others are not.

Sheet 1:

- The plan shows a widening to three travel lanes in each direction (plus additional turn lanes at major intersections) on Route 31 west of NY 481. However, the list of mitigation measures on p. 0-12 (and throughout the DEIS) only mentions widening Route 31 between Morgan Rd and Route 11. What is the justification for widening west of NY 481? Also, the plan indicates a raised median in this segment, but does not indicate turn restrictions at the remaining unsignalized driveways, which presumably will become right-in/right-out only driveways (with U-turns allowed at signalized intersections).

Sheet 2:

- Consider a future connection to Sutcliffe Dr in the design of the Carling Rd extension, which would allow residents of the Pine Gate area better access to Route 31 while reducing trips on Soule Rd. Coordinate with the Town of Clay, and incorporate traffic calming measures on Sutcliffe Dr to alleviate any potential concerns about through traffic.
- Is it necessary to move the bike path to the south side of Route 31 in the segment between the NY 481 interchange and the westernmost Great Northern Mall driveway?

Sheet 2a:

- The proposed NY 481/Verplank Rd interchange has a very large footprint. Were alternative designs considered that would utilize less land?

Sheet 4:

- Dead-ending Caughdenoy Rd north of Route 31 reduces the connectivity of the street grid. As this area continues to develop, we suggest building a more complete local street network to provide travel choices. Use other design tools to encourage traffic to/from the Micron facility to utilize the new access road, while maintaining connectivity of Caughdenoy Rd (i.e. traffic calming on Caughdenoy Rd, perhaps limiting to right-in/right-out access at Route 31).
- Suggest continuing the share-use path along the access road into the site along the Micron entrance road.

Sheet 4a:

- Clarify the intent for the Connector Road/Micron Access Rd. As shown, this appears to be a limited-access facility with a raised (grass) center median and sidewalks along the full length. While we commend the inclusion of pedestrian facilities, it seems unlikely that anyone will walk here without connections to the adjacent neighborhoods.
- Suggest adding a bicycle facility to this road.
- This could present an opportunity to build a more connected local street grid for future residential development south of Route 31 between Maple Rd and Stearns Rd (acknowledging challenge of the railroad tracks). East-west connectivity is lacking south of Route 31. Connecting a future east-west collector to the new access road (while keeping in mind principles of good access management) would support future development in this area. Also consider access to the connector road from existing local roads such as Lilith Lane or Johanna Dr with appropriate traffic calming measures on these residential streets.
- There should be coordination with the Town of Clay and Onondaga County Planning Department on a comprehensive vision for land use and transportation development for this area.

Sheet 6:

- Widening at Route 31/Route 11 is substantial. What alternatives were considered (roundabout)?
- Plans show on-road bike lanes in addition to the shared use path in the segment of Route 31 between Lakeshore Rd and Route 11. Public preference is for separated bike facilities. Suggest removing the on-road bike lanes through this busy and complicated segment.
- There is an existing designated snowmobile trail along Route 31 through the I-81 interchange area. It does not appear that this was incorporated into the designs. Consider relocating this trail to Sneller Rd to cross I-81.

Sheet 6a:

- Label the new site entrance road on Route 11. Was there any consideration of a roundabout instead of a new signal at this location?

Sheet 6b:

- Suggest continuing the shared-use path along Sneller Rd through the proposed interchange with I-81.

Archived: Thursday, August 14, 2025 9:54:51 AM
From: petehuntley@aol.com
Mail received time: Thu, 7 Aug 2025 18:03:30
Sent: Thursday, August 7, 2025 2:03:30 PM
To: chipsnepa
Subject: [EXTERNAL] Micron Environmental Statement
Importance: Normal
Sensitivity: None

[Sent from AOL o](#)

[MICRON ENVIRONMENTAL STATEMENT QUESTIONS](#)

petehuntley@aol.com

-
[SCHROEPEL WETLANDS](#)

CHIPSNEPA@chips.gov

Over 400 acres of forest and farm land in the Town of Schroepel (& surrounding towns) are to be flooded to replace wetlands taken for the Micron development. Taxes on these areas are now being paid each year to the Town, but once they become wet lands they are non-taxable and the Town will lose this income. I have not seen anywhere where this lost revenue is being replaced by Micron or Onondaga Co... Oswego Co. and its Towns will not only lose income from the loss of tax revenue, but its residences will at the same time be burdened

with the added expenses of houses, schools, roads, etc. needed to support Micron. Oswego Co. residences will also be forced to deal with the problems associated with these additional wetlands (not only mosquitos and the diseases they bring, but also spending less time enjoying their yards. These diseases have been in the county for years, killing horses and infecting humans. Spraying is now taking place for an outbreak of EEE & West Nile in Cicero & Oswego Co.. While Onondaga Co. seems to be getting reimbursement from various sources, neighboring counties seem to be void of many of these benefits.

I have heard that combining with existing wetlands in the Town, when this project is completed 40% of the Town of Schroepfel will be wetlands. These new wetlands will bring an additional array of problems that the Town will have to deal with for years to come. Are the Schroepfel taxpayers going to have to pay all this additional expence without reimbursement from Micron or Onondaga Co.? I would also like to know what type of compensation is going to be paid to the taxpayers of Schroepfel

for having their quality of life greatly reduced.

All areas so far purchased for wet lands are within short distances from many homes, both single homes and developments. One of those areas contains a major Paleo Indian site which was the location of four archaeological digs and has been featured in two books. Some of the land already purchased for flooding includes the area on Rt # 264 which contains the Potts Site (an 11,000-year-old Paleo Indian site) that is featured in two books and has had around four archaeological digs done by Dr. William A. Ritchie in the 1960s and Richard Michael Gramly in the 1980s. A mastodon rib /or whale bone from this period was also found in this area.

Another area purchased is somewhere on Perry Rd. where it has long been rumored to contain two pioneer family graves.

There are many archaeological and historic sites throughout the Town of Schroepel. I have not seen where the information on these sites and their locations is being preserved before they are destroyed.

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[n Android](#)

Archived: Thursday, August 14, 2025 9:55:16 AM

From: petehuntley@aol.com

Mail received time: Thu, 7 Aug 2025 19:05:14

Sent: Thursday, August 7, 2025 3:05:16 PM

To: chipsnepa

Subject: [EXTERNAL] Micron Environment Statement

Importance: Normal

Sensitivity: None

Waste water:

My final concern is with the waste water being dumped into the Oneida River. It is my understanding that when the Micron plant is up and running there will be twice the amount of waste water dumped into the river systems than is currently being discharged.

In talking with my father several years ago (I believe in the 1980s) he stated that the Oneida River (and the other rivers) were at near capacity as far as waste water they could handle. He stated that it was getting to the point that the rivers could not hold much more waste that wasn't 100% treated (pure water). It does not make sense that the rivers can now handle such an increase in volume. My father was the temp head for Region 7 of the D.E.C. for a while whose main focus was on waste water, etc.

petehuntley@aol.com

Archived: Thursday, August 14, 2025 9:55:45 AM

From: petehuntley@aol.com

Mail received time: Thu, 7 Aug 2025 18:38:46

Sent: Thursday, August 7, 2025 2:38:48 PM

To: chipsnepa

Subject: [EXTERNAL] Micron Environment Statement

Importance: Normal

Sensitivity: None

There aren't any archeological or historic sites located within the area where the Micron plant is to be constructed. Yet the area nearby contains over a dozen of these sites. My concern is that these areas will not be fully explored with their information and locations being preserved before they are completely destroyed by related development.

Most of these sites (in the Town of Clay) are located along the Oneida River from Three-Rivers to Brewerton. The early Onondaga encampment is located at Three-Rivers on the Clay side of the river. On the Schroepfel side of the river is the location of an early fort as well as the encampment of 10,000 troops. This area also is the location of where early Circle Mounds were located.

The location of the Great Stone Bowl makers was at Horseshoe Island. The Oak Orchard area contains many sites including three native burial grounds, camping and fishing sites. This also was the location of the Paleo Indians and the Greenland Eskimos. Oak Orchard is also the site of an early massacre. The Great Flint Rock was located at nearby Caughdenoy. There is also at least one booklet on the burials from there to Brewerton. The Town of Schroepfel on the other side of the river also has many sites. A lot of work needs to be done to save this historic information, perhaps by New York college students.

petehuntley@aol.com

From: Leah Kraus <leah.m.kraus@gmail.com>
Sent: Thursday, August 7, 2025 4:01 PM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Concerned about environmental impact of Micron in CNY - please slow down!!

The Micron project stands to destroy hundreds of acres of wetlands harboring complex engaged species habitats and providing natural flood mitigation, and microchip production in general requires toxic chemicals, including PFAS, or “forever chemicals.” I am EXTREMELY concerned about the health consequences of unregulated PFAs in our local ground water, surface and drinking water.

The DEIS does not provide sufficient detail on the types of chemicals that will be used or how continuous environmental monitoring and compliance will be enforced.

We must have clear, transparent and enforceable mechanisms to avoid contamination and degradation of surface waters, drinking water, and local wetlands.

Thank you,
Leah Kraus
244 Marsh Dr.
Syracuse, NY 13214

From: McManus, Hilary <mcmantuha@lemoyne.edu>
Sent: Thursday, August 7, 2025 11:04 AM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001
Attachments: McManus Comments on DEIS.pdf

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York.

In addition to my comments below, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025.

Based on my current understanding of the DEIS, I still want to highlight key environmental impacts as well as mitigation measures, which are insufficiently addressed in the DEIS. I am including my comments below, and attaching them as a PDF. Though not directly addressed in my comments, the degradation of the environment and ecosystem functioning will impact human health through increased flooding, forever chemicals released into our drinking water, increased GHG emissions exacerbating climate change, and increased harmful algal blooms.

On July 23, 2025, The International Court of Justice ruled that governments have an obligation to protect the environment from greenhouse gas emissions, prevent climate harm, protect human rights, and to act with urgency and cooperation. (<https://news.un.org/en/story/2025/07/1165475>)

Additionally, the Inter-American Court of Human Rights has recently officially recognized that nature has rights in its Advisory Opinion OC-32/35, and that the loss of biodiversity (as proposed in the DEIS) threatens both nature and human well-being. Governments now have obligations to protect ecosystems. (<https://www.garn.org/inter-american-court-of-human-rights-rights-of-nature/>)

I urge consideration and response to the issues and concerns included below.

Sincerely,
Hilary A. McManus, Ph.D.

Director of Environmental Sciences
Professor of Biological and Environmental Sciences
Le Moyne College
1419 Salt Springs Rd
Syracuse, NY 13214-1301

McManus Comments on the DEIS

1. Loss of Wetlands

- "Construction of the Proposed Project would result in the permanent loss of approximately 193.38 acres of wetlands being treated as Federal jurisdictional wetlands, or approximately 174.77 acres of wetlands being treated as State jurisdictional, (p. 3-72) ..."
- "78.86 acres of wetlands will be lost during the proposed connected actions." (Page 3-66, section 3.3).
- "Construction of the Proposed Project would result in the direct loss of wetlands and their functions and services from site development. In addition, wetland buffers (typically 100 feet from the edge of a wetland in the New York State) would be lost. Increased impervious surfaces could lead to indirect effects from increased stormwater runoff and decreased groundwater recharge."
- "11,600 parking spaces, four bus stops, and seven access roads would be constructed on the campus, including four 500-space surface parking lots. (Table 2.1-3, p. 2-13.)"

Response

- ***How will the release of CO₂ and CH₄ during the destruction of the wetlands, and the loss of the sequestration value, be mitigated?***

Wetlands are essential to our health and environment. They support more than 1/3 of the country's threatened and endangered species, filter pollutants, and buffer communities from floods. They also store vast amounts of carbon, making them powerful tools in the fight against climate change. In fact, 300 acres of freshwater wetlands store ~305,000 metric tons of carbon dioxide, roughly equal to the yearly emissions of 66,000 cars. Destroying these wetlands will release this CO₂ into the atmosphere and remove future carbon storage, further contributing to climate change. This release of CO₂ is not accounted for in Micron's Draft Environmental Impact Statement (Nahlik & Fennessy, 2016; Watson et al. 2000).

According to the EPA and peer-reviewed literature (e.g., Bridgham et al., 2006), drained freshwater wetlands in temperate regions can release approximately 3-10 metric tons of CH₄ (methane, a potent greenhouse gas) per hectare over the short term following destruction (via oxidation and disturbance). This will further exacerbate climate change.

- ***How will the impacts of wetland dredging, filling, and installation of impervious surfaces on surrounding streams and other water resources be mitigated?***

If the percent catchment impervious surface cover (ISC) increases to 10-20%, runoff increases twofold; 35-50% ISC increases runoff threefold; and 75-100% ISC increases surface runoff more than fivefold over forested catchments.

Imperviousness has become an accurate predictor of urbanization and urban impacts on streams, and many thresholds of degradation in streams are associated with an ISC of 10-20% (Meyer and Paul 2001).

Nearby wetlands are sure to be degraded by these indirect effects. The wetlands on site are good quality, including red maple swamps, hemlock-hardwood swamps, floodplain forests, and dogwood and willow shrub swamps. These wetlands contain a high proportion of native species that benefit insect production that serves as the basis of food webs. Construction and operation of Micron will decimate these food web connections. Wildlife will be driven off by noise, lights, and increased human traffic. Road salt and other runoff will degrade remaining wetlands into monocultures of Phragmites or invasive cattails, which support minimal animal and plant diversity.

Removing water to lower the water table on the site for 15 years will impact surrounding streamflow and aquatic ecosystems, leading to unintended consequences such as elimination of small streams and wetlands from the landscape. Such developments typically bring a cascading sequence of negative landscape impacts that the Plan aims to reduce and mitigate, but fails to do enough.

Further, we can expect these impacts to be multiplied in subsidiary development in the Clay, Cicero, and greater Onondaga and Oswego County areas, with the increase in impervious surfaces associated with thousands of new housing units, office and business spaces. These impacts just continue the trend of decades of wetland draining and filling in the northern part of Onondaga County.

Recommendation

Because of these and other indirect and cumulative impacts (subsidiary development predicted to occur in the watershed, for example) we strongly urge regulators to increase the wetland replacement ratio from ~2:1 to ~10-15:1, as was done for the Seneca Meadows wetlands restoration project (see <https://res.us/projects/seneca-meadows-wetland-restoration-design-build-mitigation-for-landfill-impacts-to-wetlands/>).

****Ideally, the location of the proposed plant should be relocated so that wetlands are not destroyed.****

Note: Indirect effects on adjacent wetlands and ones connected hydrologically, all the way out to Oneida River floodplain.

2. Wetland Mitigation Plan

Wetland Mitigation Work Plan, Appendix G.

Section 4.1 Selection and Design Criteria

- “Work areas contain few, if any, existing wetlands, which allows for focus on reestablishment and are near or adjacent to existing DEC wetlands. Delineated wetlands will be subsumed into the work area and will be either registered as rehabilitation if the area is marginal, which is usually the case, or will otherwise be subtracted from the total acreage built and corresponding credits generated. The agencies decide which option is selected.”
- “2. Sites are in active soybean production. The sites will stay in active agriculture until construction commences, which helps prevent invasive species and incompatible land uses.”

Response

- ***Creating/restoring replacement wetlands that are fragmented is not equivalent to the functioning of the current wetlands that will be destroyed. How will this be accounted for?***

The wetland mitigation sites are currently in soybean production, for the most part. That's a major problem since it means there will be a gap of decades before the wetlands (especially the forested ones, 70 acres direct loss) can provide the similar ecological services that the current ones provide (though studies have shown they never reach the same functional capacity as original wetlands - see Moreno-Mateos et al. (2012) - summary below). The sites are also closer to disturbance (roads, farms, homes).

The mitigation sites are also smaller, isolated fragments, not the integrated whole of the Micron site (with its matrix of forest, grassland, and wetland intertwining— See Fig.F-3, for example).

A meta-analysis by Moreno-Mateos et al. (2012) of 621 restored or created wetlands worldwide found that, even up to 100 years after restoration, biological structure (primarily plant communities) remained about 26% lower and biogeochemical function (driven by soil carbon storage) about 23% lower than in undisturbed reference wetlands. The authors conclude that current restoration practices are often unable to fully recover the original ecosystem functions.

Recommendation

To address these issues, we strongly urge regulators to require Micron to purchase large acreage of existing wetlands (especially forest and shrublands) such as any remaining floodplain forest along the Oneida River. These areas should be protected in perpetuity and held by TWT or the CNY Land Trust.

****Ideally, the location of the proposed plant should be relocated so that wetlands are not destroyed.****

3. Impacts of the Connected Actions on wetlands

Page 3-66, section 3.3:

“A total of 78.86 acres of wetlands have been mapped or delineated within the Connected Action LODs, including the Clay Substation expansion area and the natural gas, water supply, and wastewater improvement LODs, and are being treated as jurisdictional. However, jurisdictional determinations have not yet been issued for these features, with the exception of the Clay Substation (USACE only). For additional information on these wetlands, see Appendix F-3.1.”

F-3.1.4:

“The presence and extent of wetlands within each Connected Action LOD were delineated in the field and evaluated in the same manner as those conducted for the proposed Micron Campus, except for wetlands within the proposed water supply improvement LODs, because those improvements are currently scheduled too far in the future for wetland delineations conducted at this time to be valid by the time construction begins.”

“Further, the total amount of non-jurisdictional wetlands present within the LODs cannot be determined at this time because not all of the LODs have been delineated. Except as described below for the proposed Clay Substation expansion area, functional analyses of wetlands within the remaining Connected Action LODs also have not yet been conducted, for various reasons, including because field delineations have not yet been performed, wetlands have yet to be assessed by USACE or NYSDEC, or losses of jurisdictional wetlands within the remaining LODs are anticipated to be negligible.”

F-3.2.2

“Connected Actions The presence and extent of rivers and streams within each Connected Action LOD were delineated in the field and evaluated in the same manner as those conducted for the Proposed Project components, except for rivers and streams within the

proposed water supply improvement LOD, because those improvements are currently scheduled too far in the future for delineations conducted at this time to remain valid by the time construction begins.”

Response & Recommendation

78.86 acres of wetlands and surrounding rivers and streams that will be impacted by future connected actions have not been evaluated yet - these need to be evaluated before any construction begins so that impacts of development can be tracked over time. Also, we need an understanding of total impact (over the entire period of construction) on wetland function, wildlife and plant communities.

****Ideally, the location of the proposed plant should be relocated so that wetlands are not destroyed.****

4. Effects on Reptiles and Amphibians (3-118)

- “Mass mortality of reptiles and amphibians, including salamanders, frogs, turtles, and snakes, would be expected to occur during construction as a result of site clearing, grubbing, and grading, as these taxa are not mobile enough to avoid the paths of most site clearing and earthmoving activities. Noise and lighting disturbances also would potentially affect reptiles and amphibians in immediately adjacent areas. In addition, construction could indirectly affect amphibians and aquatic reptiles by altering the water balance and water quality of the Youngs Creek basin. However, as described in Section 3.3 (Water Resources), Micron would implement stormwater BMPs and would be required to undertake SMPs that would be documented in a SWPPP as part of its SPDES CGP. Micron also would implement the ESCP described above. Together, these measures would help minimize adverse effects on reptiles and amphibians. Construction effects on special status species are described under Special Status Species below.”
- *Connected Actions:* “As described in Chapter 2, National Grid, OCWA, and OCDWEP would undertake construction of the Connected Actions at various times over the course of the Proposed Project’s 16-year construction period. As noted in Section 3.4.3.1, because the Connected Actions remain at various design stages, the ecological community acreages within the Connected Action LODs were estimated based on wetland delineations where available and were otherwise identified using field mapping and reviews of aerial imagery, under the conservative assumption that Connected Action construction effects would occur across all wetland and upland cover types within the LODs. Therefore, this section assumes that construction of the Connected Actions would disturb the ecological communities in all 594 acres across the Connected Action LODs as identified in Table 3.4-2 and Table 3.4-3, although actual disturbance to existing ecological communities and land cover types would likely be less than the full extent of all the LODs, given that actual construction activity would not be anticipated to occur across the entire footprints of existing utility properties or the entire widths of existing utility easements.

Response & Recommendation

- ***What is the plan for moving displaced fauna to new homes?***
- Mortality of frogs, toads, turtles, salamanders will be high without some sort of rescue plan. To facilitate animal movement into these scattered sites, and limit road mortality, we urge regulators to require Micron to construct road crossings for fauna such as turtles, salamanders, snakes, frogs, toads.
- Micron needs to provide studies of other developments where their proposed measures (stormwater BMPs, SMPs, ESCP) were successful in minimizing adverse effects on reptiles and amphibians.
- For wildlife in general, support conservation housing (for example, <https://res.us/projects/prairie-crossing-sustainable-conservation-development/>) to reduce habitat loss due to subsidiary development; require native plant landscaping (not just on Micron site, but new construction)
- Provide financial support for Native plant nurseries to help mitigate extensive regional habitat loss, estimated at 10,000 acres of forest and grassland (Glenn Coin article, May 11, 2025 Post Standard).

****Ideally, the location of the proposed plant should be relocated so that wetlands are not destroyed.****

5. Aquatic Life

3.4.4.2 (page 3-119)

“The filling of wetlands and surface waters during construction of the Micron Campus would reduce the Youngs Creek wetland complex on the site and associated aquatic habitat. The elimination of wetlands and headwater streams, as described in Section 3.3 (Water Resources), could permanently alter the transport of sediment, organic matter, nutrients, and macroinvertebrates that are critical to downstream physical, chemical, and biological attributes and processes, including species composition and food web dynamics (Gomi et al. 2002, Meyer et al. 2007). Vegetation clearing and other construction effects may elevate stream temperatures, which could cause temperatures to exceed the tolerance levels of sensitive species, including many cold-water fish and macroinvertebrates (Nelson and Palmer 2007). Changes in topography and soil exposure may temporarily increase soil erosion, which could increase sediment, turbidity, and nutrient loading in receiving waterbodies. This could lead to harmful algal blooms and decreased dissolved oxygen levels, which could lead to fish kills, increased establishment and spread of invasive plants, or other adverse effects on aquatic biota (Driscoll

2003, Fleming and Dibble 2015). As described in Section 3.3 (Water Resources), Micron would conduct water level and flow monitoring during construction to assess surface water and groundwater inflow and outflow in response to seasonal variations and precipitation events. In addition, Micron would implement the stormwater BMPs and SMPs and the ESCP described above to prevent discharge of sediment into wetlands and waterbodies during construction. These measures would help minimize adverse effects on the Youngs Creek complex downstream of areas of disturbance and on aquatic life in the complex.”

Response

- ***What studies have been done that indicate the measures proposed here will in fact minimize the stated effects?***

The proposed mitigation measures do not address the impacts of "vegetation clearing and other construction effects" on stream temperatures which are predicted to elevate and therefore exceed tolerance levels of sensitive species (cold-water fish, macroinvertebrates, aquatic plants) and cause potentially toxic algae blooms.

Recommendation

Perform the necessary studies and find methods that reduce the impacts on aquatic life.

****Ideally, the location of the proposed plant should be relocated so that wetlands are not destroyed.****

References

Bridgham, Scott & Megonigal, Patrick & Keller, Jason & Bliss, Norman & Trettin, Carl. (2006). The Carbon Balance of North American Wetlands. *Wetlands*. 26. 889-916. 10.1672/0277-5212(2006)26[889:TCBONA]2.0.CO;2.

Moreno-Mateos, D., Power, M. E., Comín, F. A., & Yockteng, R. (2012). *Structural and functional loss in restored wetland ecosystems*. *PLoS Biology*, 10(1), e1001247. doi:10.1371/journal.pbio.1001247

Nahlik, A., Fennessy, M. Carbon storage in US wetlands. *Nat Commun* 7, 13835 (2016). <https://doi.org/10.1038/ncomms13835>

Paul, M. J., & Meyer, J. L. (2001). Streams in the urban landscape. *Annual review of Ecology and Systematics*, 32(1), 333-365.

Watson, Robert T., Noble, Ian R., Bolin, Bert; Ravindranath, N. H.; Verardo, David J.; Dokken, David J. (2000). [Land Use, Land-Use Change and Forestry \(Intergovernmental Panel on Climate Change Special Report\)](#). Cambridge, UK: Cambridge University Press. ISBN 9780521800839.

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I urge consideration and response to the following issues and concerns:

1. Loss of Wetlands

- "Construction of the Proposed Project would result in the permanent loss of approximately 193.38 acres of wetlands being treated as Federal jurisdictional wetlands, or approximately 174.77 acres of wetlands being treated as State jurisdictional, (p. 3-72) ..."
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- "11,600 parking spaces, four bus stops, and seven access roads would be constructed on the campus, including four 500-space surface parking lots. (Table 2.1-3, p. 2-13.)"

Response

- ***How will the release of CO₂ and CH₄ during the destruction of the wetlands, and the loss of the sequestration value, be mitigated?***

Wetlands are essential to our health and environment. They support more than 1/3 of the country's threatened and endangered species, filter pollutants, and buffer communities from floods. They also store vast amounts of carbon, making them powerful tools in the fight against climate change. In fact, 300 acres of freshwater wetlands store ~305,000 metric tons of carbon dioxide, roughly equal to the yearly emissions of 66,000 cars. Destroying these wetlands will release this CO₂ into the atmosphere and remove future carbon storage, further contributing to climate change. This release of CO₂ is not accounted for in Micron's Draft Environmental Impact Statement (Nahlik & Fennessy, 2016; Watson et al. 2000).

According to the EPA and peer-reviewed literature (e.g., Bridgham et al., 2006), drained freshwater wetlands in temperate regions can release approximately 3-10 metric tons of CH₄ (methane, a potent greenhouse gas) per hectare over the short term following destruction (via oxidation and disturbance). This will further exacerbate climate change.

- ***How will the impacts of wetland dredging, filling, and installation of impervious surfaces on surrounding streams and other water resources be mitigated?***

If the percent catchment impervious surface cover (ISC) increases to 10-20%, runoff increases twofold; 35-50% ISC increases runoff threefold; and 75-100% ISC increases surface runoff more than fivefold over forested catchments.

Imperviousness has become an accurate predictor of urbanization and urban impacts on streams, and many thresholds of degradation in streams are associated with an ISC of 10-20% (Meyer and Paul 2001).

Nearby wetlands are sure to be degraded by these indirect effects. The wetlands on site are good quality, including red maple swamps, hemlock-hardwood swamps, floodplain forests, and dogwood and willow shrub swamps. These wetlands contain a high proportion of native species that benefit insect production that serves as the basis of food webs. Construction and operation of Micron will decimate these food web connections. Wildlife will be driven off by noise, lights, and increased human traffic. Road salt and other runoff will degrade remaining wetlands into monocultures of Phragmites or invasive cattails, which support minimal animal and plant diversity.

Removing water to lower the water table on the site for 15 years will impact surrounding streamflow and aquatic ecosystems, leading to unintended

consequences such as elimination of small streams and wetlands from the landscape. Such developments typically bring a cascading sequence of negative landscape impacts that the Plan aims to reduce and mitigate, but fails to do enough.

Further, we can expect these impacts to be multiplied in subsidiary development in the Clay, Cicero, and greater Onondaga and Oswego County areas, with the increase in impervious surfaces associated with thousands of new housing units, office and business spaces. These impacts just continue the trend of decades of wetland draining and filling in the northern part of Onondaga County.

Recommendation

Because of these and other indirect and cumulative impacts (subsidiary development predicted to occur in the watershed, for example) we strongly urge regulators to increase the wetland replacement ratio from ~2:1 to ~10-15:1, as was done for the Seneca Meadows wetlands restoration project (see <https://res.us/projects/seneca-meadows-wetland-restoration-design-build-mitigation-for-landfill-impacts-to-wetlands/>).

****Ideally, the location of the proposed plant should be relocated so that wetlands are not destroyed.****

Note: Indirect effects on adjacent wetlands and ones connected hydrologically, all the way out to Oneida River floodplain.

2. Wetland Mitigation Plan

Wetland Mitigation Work Plan, Appendix G.

Section 4.1 Selection and Design Criteria

- “Work areas contain few, if any, existing wetlands, which allows for focus on reestablishment and are near or adjacent to existing DEC wetlands. Delineated wetlands will be subsumed into the work area and will be either registered as rehabilitation if the area is marginal, which is usually the case, or will otherwise be subtracted from the total acreage built and corresponding credits generated. The agencies decide which option is selected.”
- “2. Sites are in active soybean production. The sites will stay in active agriculture until construction commences, which helps prevent invasive species and incompatible land uses.”

Response

- ***Creating/restoring replacement wetlands that are fragmented is not equivalent to the functioning of the current wetlands that will be destroyed. How will this be accounted for?***

The wetland mitigation sites are currently in soybean production, for the most part. That's a major problem since it means there will be a gap of decades before the wetlands (especially the forested ones, 70 acres direct loss) can provide the similar ecological services that the current ones provide (though studies have shown they never reach the same functional capacity as original wetlands - see Moreno-Mateos et al. (2012) - summary below). The sites are also closer to disturbance (roads, farms, homes).

The mitigation sites are also smaller, isolated fragments, not the integrated whole of the Micron site (with its matrix of forest, grassland, and wetland intertwining— See Fig.F-3, for example).

A meta-analysis by Moreno-Mateos et al. (2012) of 621 restored or created wetlands worldwide found that, even up to 100 years after restoration, biological structure (primarily plant communities) remained about 26% lower and biogeochemical function (driven by soil carbon storage) about 23% lower than in undisturbed reference wetlands. The authors conclude that current restoration practices are often unable to fully recover the original ecosystem functions.

Recommendation

To address these issues, we strongly urge regulators to require Micron to purchase large acreage of existing wetlands (especially forest and shrublands) such as any remaining floodplain forest along the Oneida River. These areas should be protected in perpetuity and held by TWT or the CNY Land Trust.

****Ideally, the location of the proposed plant should be relocated so that wetlands are not destroyed.****

3. Impacts of the Connected Actions on wetlands

Page 3-66, section 3.3:

“A total of 78.86 acres of wetlands have been mapped or delineated within the Connected Action LODs, including the Clay Substation expansion area and the natural gas, water supply, and wastewater improvement LODs, and are being treated as jurisdictional. However, jurisdictional determinations have not yet been issued for these features, with the exception of the Clay Substation (USACE only). For additional information on these wetlands, see Appendix F-3.1.”

F-3.1.4:

“The presence and extent of wetlands within each Connected Action LOD were delineated in the field and evaluated in the same manner as those conducted for the proposed Micron Campus, except for wetlands within the proposed water supply improvement LODs, because those improvements are currently scheduled too far in the future for wetland delineations conducted at this time to be valid by the time construction begins.”

“Further, the total amount of non-jurisdictional wetlands present within the LODs cannot be determined at this time because not all of the LODs have been delineated. Except as described below for the proposed Clay Substation expansion area, functional analyses of wetlands within the remaining Connected Action LODs also have not yet been conducted, for various reasons, including because field delineations have not yet been performed, wetlands have yet to be assessed by USACE or NYSDEC, or losses of jurisdictional wetlands within the remaining LODs are anticipated to be negligible.”

F-3.2.2

“Connected Actions The presence and extent of rivers and streams within each Connected Action LOD were delineated in the field and evaluated in the same manner as those conducted for the Proposed Project components, except for rivers and streams within the proposed water supply improvement LOD, because those improvements are currently scheduled too far in the future for delineations conducted at this time to remain valid by the time construction begins.”

Response & Recommendation

78.86 acres of wetlands and surrounding rivers and streams that will be impacted by future connected actions have not been evaluated yet - these need to be evaluated before any construction begins so that impacts of development can be tracked over time. Also, we need an understanding of total impact (over the entire period of construction) on wetland function, wildlife and plant communities.

****Ideally, the location of the proposed plant should be relocated so that wetlands are not destroyed.****

4. Effects on Reptiles and Amphibians (3-118)

- “Mass mortality of reptiles and amphibians, including salamanders, frogs, turtles, and snakes, would be expected to occur during construction as a result of site clearing, grubbing, and grading, as these taxa are not mobile enough to avoid the paths of most site clearing and earthmoving activities. Noise and lighting disturbances also would potentially affect reptiles and amphibians in immediately adjacent areas. In addition, construction could indirectly affect amphibians and aquatic reptiles by altering the water balance and water quality of the Youngs Creek basin. However, as described in Section 3.3 (Water Resources), Micron would implement stormwater BMPs and would be required to undertake SMPs that

would be documented in a SWPPP as part of its SPDES CGP. Micron also would implement the ESCP described above. Together, these measures would help minimize adverse effects on reptiles and amphibians. Construction effects on special status species are described under Special Status Species below.”

- *Connected Actions*: “As described in Chapter 2, National Grid, OCWA, and OCDWEP would undertake construction of the Connected Actions at various times over the course of the Proposed Project’s 16-year construction period. As noted in Section 3.4.3.1, because the Connected Actions remain at various design stages, the ecological community acreages within the Connected Action LODs were estimated based on wetland delineations where available and were otherwise identified using field mapping and reviews of aerial imagery, under the conservative assumption that Connected Action construction effects would occur across all wetland and upland cover types within the LODs. Therefore, this section assumes that construction of the Connected Actions would disturb the ecological communities in all 594 acres across the Connected Action LODs as identified in Table 3.4-2 and Table 3.4-3, although actual disturbance to existing ecological communities and land cover types would likely be less than the full extent of all the LODs, given that actual construction activity would not be anticipated to occur across the entire footprints of existing utility properties or the entire widths of existing utility easements.

Response & Recommendation

- ***What is the plan for moving displaced fauna to new homes?***

- Mortality of frogs, toads, turtles, salamanders will be high without some sort of rescue plan. To facilitate animal movement into these scattered sites, and limit road mortality, we urge regulators to require Micron to construct road crossings for fauna such as turtles, salamanders, snakes, frogs, toads.
- Micron needs to provide studies of other developments where their proposed measures (stormwater BMPs, SMPs, ESCP) were successful in minimizing adverse effects on reptiles and amphibians.
- For wildlife in general, support conservation housing (for example, <https://res.us/projects/prairie-crossing-sustainable-conservation-development/>) to reduce habitat loss due to subsidiary development; require native plant landscaping (not just on Micron site, but new construction)
- Provide financial support for Native plant nurseries to help mitigate extensive regional habitat loss, estimated at 10,000 acres of forest and grassland (Glenn Coin article, May 11, 2025 Post Standard).

****Ideally, the location of the proposed plant should be relocated so that wetlands are not destroyed.****

5. Aquatic Life

3.4.4.2 (page 3-119)

“The filling of wetlands and surface waters during construction of the Micron Campus would reduce the Youngs Creek wetland complex on the site and associated aquatic habitat. The elimination of wetlands and headwater streams, as described in Section 3.3 (Water Resources), could permanently alter the transport of sediment, organic matter, nutrients, and macroinvertebrates that are critical to downstream physical, chemical, and biological attributes and processes, including species composition and food web dynamics (Gomi et al. 2002, Meyer et al. 2007). Vegetation clearing and other construction effects may elevate stream temperatures, which could cause temperatures to exceed the tolerance levels of sensitive species, including many cold-water fish and macroinvertebrates (Nelson and Palmer 2007). Changes in topography and soil exposure may temporarily increase soil erosion, which could increase sediment, turbidity, and nutrient loading in receiving waterbodies. This could lead to harmful algal blooms and decreased dissolved oxygen levels, which could lead to fish kills, increased establishment and spread of invasive plants, or other adverse effects on aquatic biota (Driscoll 2003, Fleming and Dibble 2015). As described in Section 3.3 (Water Resources), Micron would conduct water level and flow monitoring during construction to assess surface water and groundwater inflow and outflow in response to seasonal variations and precipitation events. In addition, Micron would implement the stormwater BMPs and SMPs and the ESCP described above to prevent discharge of sediment into wetlands and waterbodies during construction. These measures would help minimize adverse effects on the Youngs Creek complex downstream of areas of disturbance and on aquatic life in the complex.”

Response

- ***What studies have been done that indicate the measures proposed here will in fact minimize the stated effects?***

The proposed mitigation measures do not address the impacts of "vegetation clearing and other construction effects" on stream temperatures which are predicted to elevate and therefore exceed tolerance levels of sensitive species (cold-water fish, macroinvertebrates, aquatic plants) and cause potentially toxic algae blooms.

Recommendation

Perform the necessary studies and find methods that reduce the impacts on aquatic life.

****Ideally, the location of the proposed plant should be relocated so that wetlands are not destroyed.****

References

- Bridgham, Scott & Megonigal, Patrick & Keller, Jason & Bliss, Norman & Trettin, Carl. (2006). The Carbon Balance of North American Wetlands. *Wetlands*. 26. 889-916. 10.1672/0277-5212(2006)26[889:TCBONA]2.0.CO;2.
- Moreno-Mateos, D., Power, M. E., Comín, F. A., & Yockteng, R. (2012). *Structural and functional loss in restored wetland ecosystems*. **PLoS Biology**, 10(1), e1001247. doi:10.1371/journal.pbio.1001247
- Nahlik, A., Fennessy, M. Carbon storage in US wetlands. *Nat Commun* 7, 13835 (2016). <https://doi.org/10.1038/ncomms13835>
- Paul, M. J., & Meyer, J. L. (2001). Streams in the urban landscape. *Annual review of Ecology and Systematics*, 32(1), 333-365.
- Watson, Robert T., Noble, Ian R., Bolin, Bert; Ravindranath, N. H.; Verardo, David J.; Dokken, David J. (2000). *Land Use, Land-Use Change and Forestry (Intergovernmental Panel on Climate Change Special Report)*. Cambridge, UK: Cambridge University Press. ISBN 9780521800839.

From: Angela Weiler <awwwweiler@gmail.com>
Sent: Thursday, August 7, 2025 9:09 AM
To: CHIPSNEPA@chips.gov; GreenCHIPS@esd.ny.gov
Subject: [EXTERNAL] Comments on Micron Draft Environmental Impact Statement - Central New York

Hello:

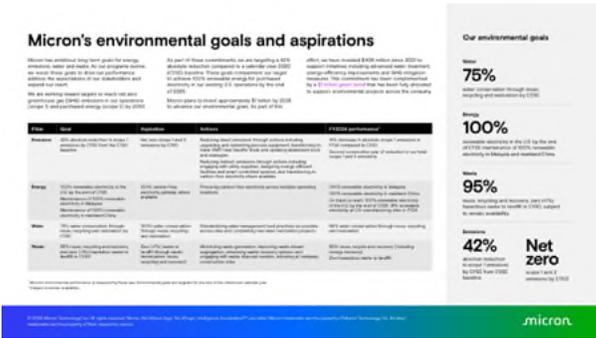
There are many questions still left unanswered by Micron's massive DEIS document, but of particular concern are their use/reuse of our water resources, including wetlands, and the effect of their processes on our air.

Water: Micron has already acknowledged that pfas will be released into wastewater. They need to be fully responsible for ensuring that **all** of their wastewater is free of pfas and other harmful chemicals before it is released into central New York waterways and back into our drinking water, particularly given the massive amounts of water that they will be using each year. They want to locate here in large part because of our water resources; we want Micron to maintain the same high standards of water purity that we have always maintained here. Ideally, Micron should be cleaning and reusing all of the water they initially use.

Additionally, their proposed wetland creation falls far short of the standard 10 to 1 ratio (created wetland to wetland loss). It also proposes using land currently under soybean production, with associated herbicide/pesticide use, some of which remains in the soil for years. This is a poor siting choice for a wetland.

Air: Micron needs to contain and treat any chemicals that their processes release into the air, including but not limited to pfas and greenhouse gasses. Such purification must be monitored by independent parties from either NY state or Onondaga County.

Micron has already set their own goal of 100% renewable energy in all their US operations by 2025 (see chart below), yet plans for installation of renewable energy equipment such as solar and use of alternatives to natural gas in their DEIS are minimal at best. New York's Green Chips Act requires companies receiving NYS funding to power their semiconductor manufacturing with 100% renewable energy, achieve LEED Gold status for buildings, reduce greenhouse gas emissions, and return zero hazardous waste in landfills by 2030. There is no mention of these goals in Micron's DEIS.



[Micron-environmental-goals-and-aspirations-2025](#)
[PDF Document · 38 KB](#)

<https://assets.micron.com/adobe/assets/urn:aaid:aem:94c92463-9bf1-4311-9465-d057307c8955/renditions/original/as/Micron-environmental-goals-and-aspirations-2025.pdf>

Let’s not forget the mess that was made of the Onondaga Lake area by previous industries which were initially viewed as “economic boons” to our area. Central New York has already experienced the environmental degradation and destruction that was left behind by past industrial development, always preceded by the promise of economic growth and job creation (e.g., Solvay Process, Allied Chemical).

Micron needs to develop and implement far more comprehensive plans to protect and preserve central New York’s environment, natural resources, and quality of life than what they have offered in their DEIS.

Angela Weiler
 Jamesville, NY

=====
 Angela M. Weiler, MLS
 Board Member - Friends of Clark Reservation
 Member - Dewitt Advisory Conservation Commission
 Master Gardener Certified – 2014
 Professor/Librarian – Emerita, Onondaga Community College
awweiler@gmail.com 315-559-7341

=====
 “In nature, nothing exists alone ... “
 -- Rachel Carson

From: Jim Wheeler <chargerrtblue@gmail.com>
Sent: Thursday, August 7, 2025 9:46 AM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Micron concerns

My concern has to do with the water that will be displaced by filling in the wetlands. I own property immediately adjacent to the north of the site. I am concerned that the water will flow from there to my property and cause flooding and excess water. During the summer there is little to no water and my expectation is that there will be no change. I have current pictures to validate this. This concern was expressed at an earlier meeting at the Clay town hall about a year ago and I have never heard anything I would appreciate a response to my concern. Thank you

To: Onondaga County Industrial Development Agency
Attn: Micron Project
335 Montgomery St. Floor 2M
Syracuse, N.Y. 13202

August 8th 2025

I am submitting the following comments with regards to the Micron EIS. I have read the local newspaper and watched the local news to keep up-to-date. I have to state right from the beginning of my comments I fervently oppose the location of the proposed Micron factory. I will list the reasons for my stance.

1st The 3 species of birds which are endangered species . To destroy these birds natural habitat is in my opinion wrong. You can't through remuneration create that which God created.

2nd The fact that OCIDA voted to give itself the power of Eminent Domain, while the normal definition of that is land acquired by Eminent Domain is after the owner is fairly compensated and the land is for Public purposes. Such as a park, highway ,etc. Now the definition according to Cornell's Law library and is 67 pages long and does discuss the use of Eminent Domain for economic reasons . But it does not take into account endangered species .

When did OCIDA become a real estate agent or company the land that you acquired you then sold to Micron. See attached page { New York Eminent Domain Laws} See Kelo V. New London. You will notice it states that the land acquired will bring in additional taxes, didn't Micron get a \$249 million dollar tax break? So what tax revenue is gained? The other is jobs it is stated that Micron will bring some 9000 jobs to the area. With the current advances in AI and robotic technology and the 17 year time line to build the factory I see maybe 900 jobs there when finished.

3rd The infrastructure that Micron wants to include , electric infrastructure, wastewater treatment facility, rail spur , water delivery system from Lake Ontario, highway expansion of I-81, 481, and then Rt. 31 from Cicero to Rt. 57. I have not seen any figures on the cost to Taxpayers . We the taxpayers didn't get to vote on this. Do you have the land for all of this or is more Eminent Domain going to be used?

4th I also want to bring up the fact County legislators seem to think they can do what they choose despite what the voters say. My point the \$100 million dollar aquarium that is currently being constructed, that the voters said NO too. Yet it's being built . Why I heard from sources in the electrical and Hvac trades that Micron wanted a tourist attraction for their employee's. What is this Field of Dreams build it and they will come. This county is number 1 in the Nation in childhood poverty and we're getting an Aquarium.

T .Armstrong

pg -1-

5th The fact Micron wants to store 55 million gallons of chemicals on site proposes a significant potential for a huge environmental catastrophe, I think I read that each gallon of these chemicals have the volatility of 5 gallons of gasoline. These chemicals are called forever chemicals and require very state of the art wastewater treatment facilities. I also read that the amount of greenhouse gases emitted by said factory could potentially make it **IMPOSSIBLE** for New York state to achieve it's clean air goals. This project starts with cutting down 400 acres of trees, do you realize how much these trees clean the air?

6th The remuneration is only a feeble attempt to placate we the taxpayers. Let's be honest I wouldn't trust the NYSDEC with a bucket of tadpoles. This is the agency that seized Peanut the squirrel and Fred the raccoon and killed them both. This is also the agency that issued an invasive species letter with regard to Faye the swan. Whom was killed and grilled by her killers then eaten. That letter allowed the DA to give what I believe was a slap on the hand punishment to Faye's killers.

7th Please see New York Eminent Domain Laws included.
You'll notice that the state got an "F" for eminent domain abuse which I believe is the case here.

These comments submitted by:
T.L. Armstrong
1619 Kingdom Rd.
Baldwinsville, N.Y. 13027

New York Eminent Domain Laws

WHAT IS EMINENT DOMAIN?

In New York, eminent domain gives the government the power to take your property, even if you don't want to sell. But under the Fifth Amendment, eminent domain must be for a "public use," which traditionally meant projects like roads or bridges. Meanwhile, the government must pay the owners "just compensation" for their property.

THE SUPREME COURT DECISION, *KELO V. NEW LONDON*, MADE IT MUCH EASIER TO ABUSE EMINENT DOMAIN

Unfortunately, the U.S. Supreme Court gutted federal protection against unconstitutional eminent domain when it handed down its decision in *Kelo v. New London* in 2005. By a vote of 5-4, the Supreme Court dramatically expanded the definition of "public use" to include private economic development. In other words, local governments can condemn homes and businesses and transfer them to new owners if government officials think that the new owners will produce more taxes or jobs with the land.

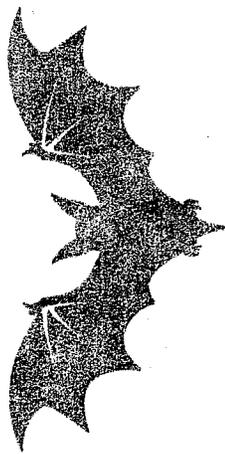
As Justice Sandra Day O'Connor warned in her dissent: "The specter of condemnation hangs over all property. Nothing is to prevent the State from replacing any Motel 6 with a Ritz-Carlton, any home with a shopping mall, or any farm with a factory."

NEW YORK RESPONDS TO *KELO*

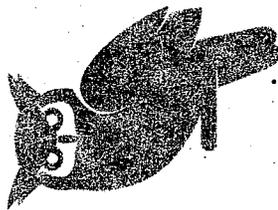
Unfortunately, New York has completely failed to pass any eminent domain reform after *Kelo*, receiving a F in a report by the Institute for Justice. New York still has some of the worst laws in the nation for eminent domain abuse, which continues throughout the state.



SAVE THE



BAT



OWL



HAWK

**TELL MICRON TO TAKE A WALK
ENDANGERED SPECIES COME FIRST**

From: Bill Howland <whowland@twcny.rr.com>
Sent: Friday, August 8, 2025 4:40 PM
To: CHIPSNEPA@chips.gov
Cc: Kate Fiorello; maregano@cicerony.gov; John Swackhamer
Subject: [EXTERNAL] MICRON EIS COMMENT

Snowmobile Trail C7L crosses OCIDA, soon to be Micron property, within the National Grid right-of-way and is shown as such on the maps in the EIS. I don't see anything in the report, however, addressing this recreational resource. This trail is a corridor trail, which is the highest classification in the statewide network of trails. It is well used as a connection to Oneida Lake as well as any destination on the statewide trail network. The Snow Owls snowmobile club, of which I am president, has signed and groomed this trail since about 2002 and we were hoping the trail would continue to use the NAGRID service road or other location within the OCIDA/Micron property.

Thank you in advance for consideration of my comment.

William Howland, Snow Owls President
7237 Lakeshore Rd.
Cicero, N.Y. 13039

(716) 860-8102

From: Russell Jerome <rjerome@jeromefire.com>
Sent: Friday, August 8, 2025 1:37 PM
To: chipsnepa@chips.gov
Subject: [EXTERNAL] Public Input to the Micron Technology Draft Environmental Impact Statement
Attachments: PFAS article April 2024.docx; Micron PFAS chemical user discharger article April 2024.docx; PFAS airborne article June 2024.docx

Concerns to be addressed:

- 1) We are a business situated in very close proximity to the proposed Micron facility. I am concerned for the health of our employees as it relates to the potential exposure to the wide array of chemicals utilized and disposed of and/or released into the air and water by Micron. I implore you to carefully and thoroughly research and review all of the chemicals to be used by Micron, and also to receive specific information as to how all chemicals will be treated for disposal in a manner that can be proven to be safe to human health. Air Quality and Water Quality in this rural area has been pure and pleasant for at least the 50 years of our existence here – it would be negligent and unacceptable to allow our Air Quality to deteriorate to noxiously unsafe levels (or even olfactorily unpleasant levels, specifically relative to locations of proposed on-site water and waste water treatment facilities). What will be done to ensure that the Air Quality in the immediately surrounding area does not degrade to levels that are unsafe to human health, and also to levels that are unpleasant/unbearable levels to the smell?
- 2) Further, I am extremely concerned about the fact that Micron intends to fill in approximately 200 acres of federally regulated wetlands on the proposed White Pine site and adjacent Rail Spur site. In addition to unavoidable and permanent wildlife habitat displacement (including the Indiana bat – both a state and federally listed endangered species which have been confirmed to currently exist in numbers on the proposed Micron site and Rail Spur site), as a neighboring land owner, we are also very concerned about the potential for water displacement to immediately adjacent properties such as ours (and others nearby). Though Micron proposes to offset the environmental impact of filling in the wetlands with a “compensatory wetland mitigation plan to offset permanent losses”, this unfortunately does not address the impact of water displacement in the immediately surrounding area during and upon completion of the proposed projects. Further, there will surely be extensive soil excavation to sizable depths in order to accommodate the weight and scope of the Micron facility – this presents very serious concerns about water table displacement issues. For over 50 years we have had no concerns or issues with any flooding, water runoff or water pooling of any nature on our property at 8721 Caughdenoy Road. Due to the vast degree of wetland removal and hard surface construction relative to the Micron and the Rail Spur projects, what will be done to ensure that the immediately adjacent properties and buildings are not negatively impacted or damaged by water displacement runoff?

- 3) Lastly, I point to the three articles attached to this email pertaining to PFAS “forever chemicals”, which have become pervasive in our natural environment. On the one hand, the Federal Government is in the process of allocating substantial financial resources (taxpayer dollars) to address and correct years of PFAS pollution in the air and in our waterways, and on the other hand the Federal Government and New York State are simultaneously providing billions of taxpayer dollars to subsidize a manufacturer that knowingly utilizes and releases PFAS “forever chemicals” in its production processes. As it relates to the Micron project, what is the response to these two diametrically opposed perspectives in relation to the PFAS chemicals that will be released into the atmosphere and into bodies of water?

Thank you for the opportunity to relay these concerns. Though we see potential value to this project in various respects, we trust that you will perform precise and necessary due diligence while considering the short term and long term Environmental impacts of a proposed project of this magnitude.

Thank you,

Russ



Russell Jerome

President | Jerome Fire Equipment Co., Inc.
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1. [U.S. & World](#)

US sets first-ever limits on ‘forever chemicals’ in drinking water

- Updated: Apr. 11, 2024, 5:58 a.m. |
- Published: Apr. 11, 2024, 5:47 a.m.
- [The Associated Press](#)

The Biden administration on Wednesday finalized strict limits on certain [so-called “forever chemicals” in drinking water](#) that will require utilities to reduce them to the lowest level they can be reliably measured. Officials say this will reduce exposure for 100 million people and help prevent thousands of illnesses, including cancers.

The rule is the first national drinking water limit on toxic PFAS, or perfluoroalkyl and polyfluoroalkyl substances, which are widespread and long lasting in the environment.

Health advocates praised the Environmental Protection Agency for not backing away from [tough limits the agency proposed last year](#). But water utilities took issue with the rule, saying treatment systems are expensive to install and that customers will end up paying more for water.

Water providers are entering a new era with significant additional health standards that the EPA says will make tap water safer for millions of consumers — a Biden administration priority. The agency has also proposed [forcing utilities to remove dangerous lead pipes](#).

Utility groups warn the rules will cost tens of billions of dollars each and [fall hardest on small communities with fewer resources](#). Legal challenges are sure to follow.

EPA Administrator Michael Regan says the rule is the most important action the EPA has ever taken on PFAS.

“The result is a comprehensive and life-changing rule, one that will improve the health and vitality of so many communities across our country,” said Regan.

PFAS chemicals are hazardous because they don’t degrade in the environment and are linked to health issues such as low birth weight and liver disease, along with certain cancers. The EPA estimates the rule will cost about \$1.5 billion to implement each year, but doing so will prevent nearly 10,000 deaths over decades and significantly reduce serious illnesses.

They’ve been used in everyday products including nonstick pans, firefighting foam and waterproof clothing. Although some of the most common types are phased out in the U.S., others remain. Water providers will now be forced to remove contamination put in the environment by other industries.

“It’s that accumulation that’s the problem,” said Scott Belcher, a North Carolina State University professor who researches PFAS toxicity. “Even tiny, tiny, tiny amounts each time you take a drink of water over your lifetime is going to keep adding up, leading to the health effects.”

PFAS is a broad family of chemical substances, and the new rule sets strict limits on two common types — called PFOA and PFOS — at 4 parts per trillion. Three other types that include GenEx Chemicals that are a major problem in North Carolina are limited to 10 parts per trillion. Water providers will have to test for these PFAS chemicals and tell the public when levels are too high. Combinations of some PFAS types will be limited, too.

Regan will announce the rule in Fayetteville, North Carolina, on Wednesday.

Environmental and health advocates praised the rule, but said PFAS manufacturers knew decades ago the substances were dangerous yet hid or downplayed the evidence. Limits should have come sooner, they argue.

“Reducing PFAS in our drinking water is the most cost effective way to reduce our exposure,” said Scott Faber, a food and water expert at Environmental Working Group. “It’s much more challenging to reduce other exposures such as PFAS in food or clothing or carpets.”

Over the last year, EPA has periodically released batches of utility test results for PFAS in drinking water. Roughly 16% of utilities found at least one of the two strictly limited PFAS chemicals at or above the new limits. These utilities serve tens of millions of people. The Biden administration, however, expects about 6-10% of water systems to exceed the new limits.

Water providers will generally have three years to do testing. If those test exceed the limits, they’ll have two more years to install treatment systems, according to EPA officials.

Some funds are available to help utilities. Manufacturer 3M recently agreed to [pay more than \\$10 billion to drinking water providers](#) to settle PFAS litigation. And the Bipartisan Infrastructure Law includes billions to combat the substance. But utilities say more will be needed.

For some communities, tests results were a surprise. Last June, a utility outside Philadelphia that serves nearly 9,000 people learned that one of its wells had a PFOA level of 235 parts per trillion, among the highest results in the country at the time.

“I mean, obviously, it was a shock,” said Joseph Hastings, director of the joint public works department for the Collegetown and Trappe boroughs, whose job includes solving problems presented by new regulations.

The well was quickly yanked offline, but Hastings still doesn’t know the contamination source. Several other wells were above the EPA’s new limits, but lower than those the state of Pennsylvania set earlier. Now, Hastings says installing treatment systems could be a multi-million dollar endeavor, a major expense for a small customer base.

The new regulation is “going to throw public confidence in drinking water into chaos,” said Mike McGill, president of WaterPIO, a water industry communications firm.

The American Water Works Association, an industry group, says it supports the development of PFAS limits in drinking water, but argues the EPA's rule has big problems.

The agency underestimated its high cost, which can't be justified for communities with low levels of PFAS, and it'll raise customer water bills, the association said. Plus, there aren't enough experts and workers — and supplies of filtration material are limited.

Work in some places has started. The company Veolia operates utilities serving about 2.3 million people across six eastern states and manages water systems for millions more. Veolia built PFAS treatment for small water systems that serve about 150,000 people. The company expects, however, that roughly 50 more sites will need treatment — and it's working to scale up efforts to reduce PFAS in larger communities it serves.

Such efforts followed [dramatic shifts in EPA's health guidance](#) for PFAS in recent years as more research into its health harms emerged. Less than a decade ago, EPA issued a health advisory that PFOA and PFOS levels combined shouldn't exceed 70 parts per trillion. Now, the agency says no amount is safe.

Public alarm has increased, too. In Minnesota, for example, Amara's Law aims to stop avoidable PFAS use. It's been nearly a year since the law's namesake, Amara Strande, died from a rare cancer her family blames on PFAS contamination by 3M near her high school in Oakdale, although a connection between PFAS and her cancer can't be proven. Biden administration officials say communities shouldn't suffer like Oakdale. 3M says it extends its deepest condolences to Amara's friends and family.

Losing Amara pushed the family towards activism. They've testified multiple times in favor of PFAS restrictions.

"Four parts per trillion, we couldn't ask for a better standard," Amara's sister Nora said. "It's a very ambitious goal, but anything higher than that is endangering lives."

1. [Central NY News](#)

Toxic forever chemicals detected in Lake Ontario, all other Great Lakes

- Updated: Jun. 05, 2024, 4:03 p.m. |
- Published: Jun. 05, 2024, 4:01 p.m.



Southwick Beach on Lake Ontario in New York on Monday, March 20, 2023. N. Scott Trimble | strimble@syracuse.com

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- Michael Hawthorne | Chicago Tribune (Tribune News Service) | Tribune News Service

Toxic forever chemicals are on the rise in Lake Michigan, an alarming finding that reflects how the Great Lakes — including Lake Ontario in Upstate New York — act like sponges soaking up pollution from near and far.

Rain and contaminated air are major sources of the contamination detected by a team of researchers from Indiana University and Canada’s top environmental agency. So are discharges from sewage treatment plants and industries.

The new study found airborne concentrations of PFAS — per- and polyfluoroalkyl substances — are much higher near Chicago and other urban areas than at rural monitoring stations in northern Michigan and Upstate New York. Previous research recorded similar patterns for flame retardants and other toxic chemicals.

Read more: [Micron would bring a new era of manufacturing to Central NY – and fears of new pollution](#)

But unlike many other contaminants, PFAS in rain were consistent throughout the Great Lakes region, likely because the chemicals are so widespread in the environment.

Levels detected in rain were the same near Chicago and at Sleeping Bear Dunes National Lakeshore, 223 miles northeast across Lake Michigan near Traverse City.

As the most comprehensive tracking of PFAS in the lakes to date, the study provides another example of how it is impossible to avoid exposure to the chemicals — some of which build up in human blood, cause cancer and other diseases and take years to leave the body.

“We need to take a broader approach to control sources releasing PFAS into the atmosphere and into bodies of water,” Marta Venier, an environmental chemist at Indiana University and co-author of the study, said in an interview. “Eventually that pollution ends up in the lakes.”

PFAS are called forever chemicals because their bonds of carbon and fluorine are nearly impossible to break — a quality that makes them attractive to manufacturers of products resistant to grease, heat, stains and water. But for decades 3M, DuPont and other PFAS makers hid from government regulators and the public what the corporations knew about the health risks.

In April, President Joe Biden’s administration required every U.S. water utility to begin routinely testing for several PFAS in drinking water. Any utility that exceeds newly adopted federal limits will get five years to overhaul treatment plants to filter the compounds out of tap water.

Based on limited testing conducted by the U.S. Environmental Protection Agency and some states, thousands of utilities face expensive upgrades to their treatment plants. For now, though, it appears Chicago and other Illinois communities that depend on Lake Michigan for drinking water will not be required to do anything other than test for the chemicals.

Testing by the Chicago Department of Water Management and the Illinois EPA detected forever chemicals in treated Lake Michigan water but at levels below the new federal standards.

All told the Great Lakes provide drinking water to more than 40 million people in the United States and Canada, including 6.6 million in Illinois.

The new study found all of the lakes are contaminated with two PFAS that initially drew attention from scientists and regulators: perfluorooctane sulfonic acid (PFOS), used by 3M for decades to make Scotchgard stain repellent, and perfluorooctanoic acid (PFOA), sold to DuPont by 3M to manufacture Teflon coatings for cookware, clothing and wiring.

PFOS and PFOA no longer are made in the United States. Chemical manufacturers claimed other versions containing fewer carbon-fluorine bonds would be safer, but their own studies found the alternatives are just as dangerous, if not more so.

Levels of two alternative PFAS, known as PFBA and PFBS, are increasing in Lake Michigan and Lake Superior, the Indiana University and Canadian researchers found. PFOS, the original Scotchgard chemical, also is on the rise in the two lakes.

Lake Ontario had the highest PFAS concentrations, likely because it is downstream from the other Great Lakes. The chemicals also are flushing out of Lake Ontario more rapidly because it empties into the St. Lawrence Seaway and the Atlantic Ocean.

Venier said she welcomes the Biden administration's drinking water regulations for PFOA, PFOS and a handful of other forever chemicals. At the same time, she noted, industry has put some 15,000 PFAS into the marketplace during the past half-century and federal regulators have continued to approve new versions.

"We know enough about these chemicals," Venier said. "It's a matter of how much is enough to decide to stop putting more of them into our environment."

Micron would bring a new era of manufacturing to Central NY – and fears of new pollution

- Updated: Apr. 23, 2024, 6:19 a.m. |
- Published: Apr. 23, 2024, 6:00 a.m.



Micron Technology plans to build a semiconductor manufacturing complex on this site in the town of Clay, at the northeast corner of Route 31 and Caughdenoy Road. The company says it will break ground next year and open two fabrication plants by 2029. N. Scott Trimble | strimble@syracuse.com

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🔗 🔗 🔗 By

- [Glenn Coin | gcoin@syracuse.com](mailto:gcoin@syracuse.com)

Syracuse, N.Y. – Central New York’s long-standing legacy of manufacturing everything from auto parts to soda ash has had a dark side: environmental pollution, still being cleaned up today.

So along with the progress and economic development promised by [Micron Technology](#) come renewed fears of long-lasting pollution from a new industry.

“We’ve been abandoned by tons of corporations that took away really good jobs and left us with incredible amounts of pollution,” Tom Judson, a co-founder of the Alliance for a Green Economy, said at a public hearing recently. “We’re not going to let that happen here again.”

As Micron promises to build a semiconductor manufacturing complex in Clay and revive the region’s role as a manufacturing center, activists say they’re worried most about the semiconductor industry’s widespread use of what are known as “forever chemicals,” so named because they don’t break down in the environment or the human body.

“The release of toxic contaminants through water pathways is one of the most serious threats of semiconductor productions,” said Lenny Siegel, executive director for the Center for Public

Environmental Oversight, in Silicon Valley. “There’s so many of these chemicals that have been untested, and we don’t know the quantities that are used.”

Many of these forever chemicals, referred to collectively as PFAS, are essential to making computer chips. They’re used in many stages of the complicated process that turns silicon wafers into chips.

More than 3,000 PFAS chemicals are in use in the U.S. They have been used since the 1950s in consumer products and fire-fighting foam, yet many PFAS compounds are not well-studied. Of those that have undergone scientific scrutiny, some are linked to high cholesterol, several kinds of cancer, damaged immune systems and liver damage.

Plus, there are not effective laboratory tests to detect the presence of most PFAS compounds, and there are few regulations for this ever-growing group of chemicals.

In early April, [the EPA for the first time issued PFAS standards](#) for drinking water, despite them being a waste product of manufacturing for decades. The agency is still working on regulations for PFAS discharges in industrial wastewater for local treatment plants, like Onondaga County’s, that are the front line of defense against PFAS contamination of waterways from industry.

With Micron and other chipmakers, there’s an extra conundrum: Many chemicals used in chip-making will be kept secret from the public and even Micron itself. Chip makers and suppliers guard their trade secrets in the name of competition and national security. We may never know all the chemicals Micron will use.

Yet there’s a possibility that forever chemicals could end up in our waterways. That’s according to everyone with a stake in the industry, from environmental activists to the federal government to the semiconductor industry itself. Without proper precautions, we could have a new generation of toxic chemicals seeping into our lakes, rivers and groundwater.

Even the U.S. Commerce Department, charged with awarding \$52 billion to jumpstart semiconductor manufacturing in the U.S., is worried.

“Wastewater discharge from semiconductor manufacturing facilities presents the greatest risk for PFAS contamination of the environment,” the department’s CHIPS Program office in December.

That potential puts pressure on Micron and local and state officials to ensure that toxic chemicals don’t make their way into our rivers and lakes. The front line will be Onondaga County’s Oak Orchard wastewater plant, which will have to undergo dramatic expansion to handle Micron, let alone the business and residential development expected to follow.

Micron says it will comply with all local, state and federal standards for discharging wastewater into Onondaga County’s sewage treatment system. The company says it will build a treatment plant on site to remove chemicals from wastewater before sending it to the public sewage system.

“It will be treated to the appropriate standard or better, and then discharged,” said Carson Henry, Micron’s senior director of strategic U.S. expansion.

Yet it’s not clear how well fab treatment systems even work because most PFAS can’t be detected with current lab tests, the CHIPS office said.

“Analytical methods for the detection of PFAS compounds in wastewater are needed to determine the removal efficiency of such treatment technologies.” the office said. “The current detection methods are limited to a few PFAS compounds.”

Government regulations lag behind

There are few regulations at the state or local level for Micron to comply with.

State and federal regulators are playing catch up to understand and regulate semiconductor chemicals even as the federal government pushes chipmaking plants to open in the U.S. in the interest of national security. Micron is expected to get \$6.1 billion in CHIPS funding to build fabs in Clay and Idaho that will produce leading-edge memory chips used in everything from cell phones to fighter jets.

The New York state Department of Environmental Conservation is only now proposing its first PFAS regulations for local wastewater plants. Those regulations would apply to three PFAS chemicals; Micron says it has already stopped using two of them.

The federal Environmental Protection Agency just this year finalized a new test that can detect a few dozen kinds of PFAS. And even if many PFAS chemicals could be detected, EPA is still hasn’t set guidelines on how much industries should be allowed to discharge. EPA plans to issue guidelines on those limits later this year.

The semiconductor industry employs PFAS chemicals in many of the 2,000 steps it takes to transform silicon wafers into the tiny computer chips. The semiconductor industry says it can’t live without PFAS.

“No known alternatives exist for many of the industry’s uses of fluorocarbon-containing material,” said the Semiconductor Industry of America’s PFAS Consortium said last year. And while the industry is looking at non-PFAS alternatives, those could take years or decades to develop them and put them into widespread use, the consortium said.

The industry also admits it needs to be a better job of removing PFAS from wastewater.

“Most PFAS are not regulated pollutants and therefore unless company specific provisions are in place, the wastewater from processes that use aqueous wet chemical formulations that contain PFAS would likely be discharged to the publicly owned treatment works without substantive removal,” the SIA said.

PFAS stands for poly- and perfluoroalkyl substances. They are synthetic compounds that bind together carbon and fluorine atoms. The chemical bonds between those elements are extraordinarily strong, making them valuable for industry but also long-lasting in the environment.

A 2021 study by Cornell University professors found that three unnamed fabs in the U.S. discharged dozens of types of PFAS into wastewater.

“Little is known about the PFASs discovered in this study, and future work should focus on the occurrence, persistence, and toxicity of these PFASs,” said the study, co-authored by Damian Helbling, a professor in Cornell’s civil and environmental engineering school.

Local treatment plants are first line of defense

While state and federal regulators scramble to develop guidelines, local wastewater treatment plants like Onondaga County’s will be the first line of defense against PFAS pollution. The EPA says that local plants don’t have the technology to test for or neutralize any PFAS that does get into treatment plants and eventually into waterways.

Before Micron can start production, it would need a permit from the county’s Water Environmental Protection department to discharge wastewater into Oak Orchard Wastewater Treatment plant, in Clay. The plant’s effluent empties into [the Oneida River and ultimately Lake Ontario](#).

Shannon Harty, commissioner of the department, said she expects that Micron will process chemicals on site.

“We’re anticipating that it’s going to be Micron’s responsibility to manage and remove PFAS before their wastewater gets to us,” Harty said.

Micron will have “significant water treatment infrastructure so that wastewater leaving the site meets or exceeds applicable water quality standards,” the company said in a statement to [syracuse.com](#). “Micron will comply with local regulatory standards before wastewater is sent for further treatment at the Oak Orchard Treatment Plant.”

The company also said it will comply “with all legal requirements to sample wastewater in accordance with EPA’s evolving sampling methodologies and analytical procedures.”

But as of now there are no local standards in place for most of the chemicals that fall under the PFAS umbrella. On the standard application for industries who want to discharge into the local treatment system, Onondaga County asks industries to indicate which of 120 “substances of concern” they might discharge.

PFAS is not on the list.

Harty said she will rely on the federal Environmental Protection Agency for guidance.

“EPA is really going to be the one that’s going to be helping us develop, what those constituents are and what the permit limits will be,” she said.

That guidance has been slow in coming. EPA concedes that it knows so little about how much PFAS wastewater treatments are already dealing with that it needs to do more testing. The agency just last

month announced it would take steps to require up to 2,000 wastewater plants across the country to test incoming flow from industrial plants.

“This collection effort is necessary because there is only very limited publicly accessible data on PFAS discharges from industrial categories,” the EPA said in March.

EPA also conceded that most treatment plants “do not operate processes and technologies that effectively reduce or destroy PFAS, (which) are subsequently discharged into surface waters.”

“That’s proprietary”

[Micron said it plans to build](#) four fabrication plants, or fabs, over the next 20 years at the corner of Route 31 and Caughdenoy Road, in Clay.

When all four fabs are operating by 2041, Micron says it could discharge 42 million gallons of industrial wastewater per day into the Oak Orchard plant. That’s more than four times the plant’s current design flow.

The county plans to spend more than \$400 million to upgrade the Oak Orchard treatment plant to accommodate Micron and the explosion of development it could generate.

Micron has not said what kinds of chemicals it will use in Clay. In an exchange with [syracuse.com](#) last summer, Henry, the key public face of Micron’s Clay project, said the company will not release information on all of the chemicals it discharges and emits.

[Syracuse.com](#): “Are we going to know what all the chemicals are there, or is that proprietary?”

Henry: “That’s proprietary.”

[Syracuse.com](#): “So we won’t know what you’re using there, what’s going into the air and water?”

Henry: “Correct.”

In fact, Henry said, Micron itself won’t be aware of all of the chemicals that will enter its factory doors.

“In some cases, our suppliers don’t tell us what (the chemicals) are, because they have their own intellectual property and trade secrets,” Henry said.

All that secrecy has activists worried.

“At this point, there are many more questions than actual facts,” said David Sonnenfeld, a retired SUNY College of Environmental Science and Forestry professor who has studied the electronics industry for more than 30 years. “The tricky stuff is, what do we not know?”

PFAS are ubiquitous

What we do know is that PFAS compounds were once widely used in manufacturing firefighting foams and in consumer products like non-stick pans. PFAS compounds have been in use since the 1950s, and were banned from many consumer products in 2002.

In areas where PFAS were used intensively and dumped, dangerous levels built up in groundwater. In the New York village of Hoosick Falls, decades of PFAS dumping led to a \$65 million settlement and a new water line. More than 700 military sites, including Hancock Field, in Syracuse, were being studied for potential PFAS contamination in soil and groundwater.

Despite many PFAS compounds being phased out in the past 20 years, they remain ubiquitous in the environment. One study found that 97% of Americans have some PFAS in their blood.

Fish in the Great Lakes have high levels of PFAS. And the chemicals are found closer to home: Refugees who ate fish from Onondaga Lake had “markedly elevated” levels of PFAS in their blood – as much as 27 times higher than the U.S. median, a [state Department of Health study found](#).

The Onondaga County Water Authority and the city of Syracuse have detected low levels of some PFAS compounds in drinking water drawn from Lake Ontario and Skaneateles Lake. The levels are well below the EPA’s new drinking water standards.

Micron said it no longer uses two major classes of PFAS, called PFOA and PFOS. The company said it is working to find alternatives to the PFAS compounds it does use.

“We are actively working on identifying alternative PFAS chemistries as part of our focus on responsible chemical stewardship,” the company said.

The CHIPS office said coming up with suitable alternatives to PFAS could take 15 to 20 years.

PFAS are just part of the chemicals in fabs

PFAS is just one group of chemicals semiconductor plants use. The CHIPS office says that about 170 chemicals used in semiconductor manufacturing are listed on the federal Toxic Substances Control Act.

At Micron’s fab in Manassas, Virginia, it stores nearly 300 kinds of chemicals, according to a 2018 report filed with the Virginia Department of Environmental Quality. Micron last year provided the New York DEC with a list of chemicals it might emit into the air. The total was 96.

In Silicon Valley, where dozens of Superfund sites are still being cleaned up after decades of pollution from the semiconductor industry, advocates for the environment and worker safety said they remain skeptical, but hopeful, that chip companies can avoid a repeat.

“I’m not arguing that they can’t do their work relatively safely,” Siegel said. “It’s not that they don’t care. It’s that they’ve introduced chemicals without adequate concern about the environmental impact, and now they have to play catch up.”

Archived: Thursday, August 14, 2025 10:15:37 AM

From: [Sonia Kragh](#)

Mail received time: Fri, 8 Aug 2025 21:19:19

Sent: Fri, 8 Aug 2025 21:17:10

To: [chipsnepa](#)

Subject: [EXTERNAL] Micron DEIS review by Dewitt Advisory Conservation Commission

Importance: Normal

Sensitivity: None

attached please find submission from Dewitt Advisory Conservation Commission. For questions and reply, use soniakragh@gmail.com. Thank you.

<https://docs.google.com/document/d/12JCqU-6XO16vfw7hEb9wBhFbnTAmVx8MGw2q-P5b6oU/edit?tab=t.0>

Sonia Kragh, member, DACC

DACC response to Micron DEIS

Respectfully accept these comments from the members of Dewitt Advisory Conservation Commission (DACC) about Micron's Proposed Action and Connected Actions regarding potential harm to the environment and suggestions for mitigation.

The **Commission** consists of members who are residents of the Town of **DeWitt**. They are individuals with diverse backgrounds and concerns willing to dedicate themselves to the preservation and improvement of the environmental quality of the Town of **DeWitt**.

Dewitt endeavors to offer strong support of Businesses and Residents while simultaneously being a good Steward of the Environment.

Here are Examples:

Dewitt made a Renewable energy pledge to be 100% electric by 2020, achieved with installation of the solar array, with an additional pledge to have renewable energy in all sectors by 2035.

Dewitt has a Sustainability Plan 2014 with ongoing action items and achievements and a Climate Change Plan.

An update to the 2010 Sustainability Policy passed unanimously in draft format and is being used in day to day decision making.

Dewitt has looked closely at the environmental effects on the town of Highway 81-481 changes.

DACC presented to the Dewitt Supervisor/Town Board on 7/14/25, naming environmental concerns related to Micron DEIS review. Below follow those concerns and others identified since the meeting by commission members.

The DEIS did not look at a meaningful radius of environmental impact of connected actions, nor did it consider that greenhouse gas emissions travel by air and will go in different directions and distances day by day, that noise travels by air and related vibration by water and earth, impacting surrounding environment, and that surface water disruption will likely have impacts well beyond the immediate build site in the decades to come.

Greenhouse Gas Emissions(ES-0-9 p 38) - The DEIS has concluded that there will be significant increases in GHG and potentially significant contributions to Climate Change.

The Micron plant in Singapore has piloted a central abatement system as part of a plan to achieve net zero carbon emissions.

Are there plans to use a central abatement system at the plant, and to what degree will this be expected to lower GHG emissions? Provide details related to the life of the project.

Provide details on GHG emissions expected in the Town of Dewitt.

Set up monitoring for repeat GHG emissions assessment at regular intervals as part of the Sustainability Plan to assess compliance and success of proposed actions.

Fossil fuel (natural gas and gas generators) is presented as the fuel source for chip manufacturing and running other operations with plans for a large gas line installed. What non fossil fuel energy options has Micron considered, or will they consider during the life of the project?

I - 481 Traffic (ES-0-11 p. 40)-. The DEIS concluded that there will be significant adverse effects on transportation and traffic during construction and operations. They presented traffic mitigations but ultimately state that recommended traffic mitigations are within jurisdiction of federal, state and local transportation agencies. Traffic along 481 which runs through Dewitt is estimated to increase 7-39 times depending on the timeline of design, construction and operations of Proposed and Connected Actions. Exit 3 leads to the CSX Dewitt Rail Yard, and Exit 2 leads to the Jamesville Quarry. Both exits lead to surface roads likely to be used in commuting to Micron.

What will traffic implications be for the Town of Dewitt in terms of air and noise pollution, Greenhouse Gas Emissions, Wait time at highway interchanges, and congested surface roads?

What other environmental impacts may occur?

Will there be environmental justice impacts from the new traffic patterns within the municipality?

Electricity (3-214) - Micron indicates that it will use renewable energy for its electricity operations. They reference purchasing 100% carbon free electricity utilizing power purchase agreements and renewable energy credits. There are plans for solar panels on some buildings, (p. 80 rooftop

solar 4 MW roofs of parking garages, WWT buildings and Bio buildings) but not on the majority of available roof space. It appears that Micron plans to draw from the existing renewable energy grid, which is already stressed to meet the needs of the central ny region. We are concerned that Dewitt residents will not have adequate electricity if Micron uses it. The credits that they consider purchasing are likely already accounted for and no new significant renewable energy projects have been started in Central or Upstate New York. Purchasing energy credits is not the same as using 100% renewable energy sourced/paid for by Micron. The infrastructure to develop and supply the high amounts of electricity that the project will consume, seems to be based on outside sources.

The Sustainability highlights from the Micron Singapore plant indicates that they installed 36,000 solar panels on the fabrication and car port solar.

Explain why Micron is not making use of more solar technology for renewable energy. Is it possible to develop a coalition of local solar operations to support Micron as well as other Central New York electricity needs?

What are Micron's plans to achieve 100% renewable energy electric without purchasing credits? Fossil fuel is presented as the fuel source for chip manufacturing and running other operations with plans for a large gas line installed. What non fossil fuel energy options has Micron considered, or will they consider during the life of the project? Request details.

Water - Micron design, construction and operations expect to use water equivalent to that used by the city of Syracuse daily, with some plans for reclamation. Water used will go through a wastewater treatment process and be discharged into the Oneida River, travelling to Oswego Rivers and Lake Ontario, which is an international body of water. Water intake for the Town of Dewitt supply is located a few miles from the mapped site of Micron water discharge into Lake Ontario. There are numerous hazardous chemicals used in the chip fabrication process and details of ability to permanently and safely dispose of these chemicals is unclear. The potential mix of intake and outflow waters in close proximity is unclear, and could vary based on weather, ice build up, wave action, and climate change which is predicted to potentially increase based on the DEIS.

Micron should commit to using/supporting treatment and monitoring technology that assures that no PFAS or other toxic chemicals are

released into the Oneida River, Oswego River, Lake Ontario, and our drinking water. Constant upgrades should occur as new technology emerges to ensure safe water discharge.

What guarantees can you provide Dewitt residents that the source of its drinking water will remain safe?

Should the Lake Ontario discharge location of Micron water be moved further from the clean drinking water source ?

Wetlands and other habitat disturbance- wetlands removal will affect carbon sequestration, release greenhouse gases, affect surface waters and potentially the water table. The construction process will also remove DEC prime farmland and grasslands/forest that harbor endangered and protected species and species of concern. The DEIS did not look at a long enough or wide enough corridor of Proposed and Connected Actions to capture effects of disturbing habitat in terms of species effects, water effects, and potential harm to health. For example, if fewer bats roost, we would expect that fewer mosquitoes would be eaten and mosquito born illnesses might increase. Mitigation by wetlands replacement will take a long time and not replace what is lost, especially for bat endangered species which may not find the home they return to to roost. Disturbance and removal of wetlands and surface waters while replacing them with impermeable surfaces like fabrication plants and parking will lead to higher risk of flooding, rechanneling, potentially into developed areas. Because construction needs to be deeper than the shallow surface water, Micron proposes to “dewater” i.e. pump out water into some kind of holding space over the 16 years of construction. This process will likely drain additional nearby wetlands, streams, and private wells for long periods of time. Because the entire region has interconnecting wetlands, swamps and surface waters, and the DEIS area studied was narrow, it is unclear what impact this will have on the waters running into, through and out of Dewitt.

Please answer what effects wetlands and surface water disturbance will have for the Town of Dewitt and what mitigation is suggested.

Include Wetlands, Stormwater Runoff and Flooding in your response.

Use an adjusted wider corridor of potential impact please.

Wetlands mitigation is currently considering land that was used for soybean agriculture that may contain pesticides and herbicides which is not ideal for wetland habitat. Please review and comment.

Geology of building locations - the site that Micron has selected for its Proposed Action and possibly for some of the Connected Actions is located over karst aquifer, meaning the underlying rock contains conduits for water passage. <https://pubs.usgs.gov/publication/sir20205030>. The DEIS states that the Proposed Action main campus is not over a karst region. If it is over a karst region, this has implications for the soundness of construction over time. Dewatering could result in weakening of karst structure and subsequent sinkholes, as well as potential for groundwater contamination should there be any chemical spills or other contamination during building and operations of the plant over its lifetime. Pollution that seeps into this rock can be transported quickly over long distances without much filtration, resulting in pollution of nearby waters like swamps, ponds, lakes, streams, rivers, and wells. It is not inconceivable that negative impact could be experienced as far as Dewitt, as the karst geology is regional and is present at Clark Reservation State Park in Dewitt. Please reference information regarding mud boils as a complication of water extraction in chemical processing south of Syracuse.

<https://www.onondaganation.org/land-rights/onondaga-creek-mud-boils/>

Please review geology related to proposed and connected action construction over karst regions as published.

Please evaluate the connected surface and ground water flow paths of the sites to determine environmental consequences to the Town of Dewitt that the Proposed Action and Connected Actions could have in case of spills containing hazardous substances of any kind. Research used and unused wells in this review.

Please evaluate the implications of drilling into karst/bedrock, then dewatering, then repeating the process in subsequent phases and the possibility that the ground will become unstable and sink holes or other ground disturbance will develop in the town of Dewitt over the expected lifetime of the Micron plant i.e. 100 years.

Air Quality/Monitoring(ES 0-8 p 37-38) - The DEIS indicates no significant effect to air quality, other than temporary related to construction. Air pollutants will be generated during the building and operation of Micron. Some byproducts of incineration may be toxic, hard to measure, or are not regulated as of 2025. Current Air pollution data used by Micron for their

assessment comes from monitors in Rochester NY. This is no where near Syracuse/Clay/Cicero/location of Proposed or Connected Actions. There is no data to determine if there are toxic air levels expected to travel along the I-81/481 corridor from Proposed and Connected Actions that will impact Dewitt.

Perform Air Quality environmental impact assessment using on site monitoring equipment pertinent to the Micron main campus and connected action involving the rail yard.

Have an independent third party determine other regional locations for air monitoring and reporting frequency.

Reevaluate as project design decisions and building phases progress.

Note - it is unclear how robust Micron is being with following through with checking and/or posting quality results. The air quality data on the Boise Micron site is sparse and not updated. For the Proposed and Connected Actions, Micron needs to do more robust monitoring and reporting on publicly available online sites.

Transportation Services - Micron has 12,000 parking spaces and must be expecting to fill them.

What Carpooling and Public Transportation services will be accessible in Dewitt? Please involve Dewitt in the conversation. Transportation Plans involving Micron campus and the County should align with municipal plans.

Connected Action Rail Spur 2.1.2 p 83 , figure p. 85 - Micron will be removing 1.5 mill cubic yards of material and importing 9 million cubic yards. In order to reduce truck transport emissions, noise and traffic, they are constructing a CSX Railroad line to deliver/remove materials to begin in the 4th quarter of 2025 and last for 7 months. The DEIS describes a process of 60 x 60 x 60 rail cars in operation from 6am to 10 pm (if time is approved by the City of Clay) to transport, off load and pick up materials. The spur & trucking will also be used to deliver to the Micron fabs and childcare center.

All of this material will be coming from and going to somewhere before it gets to the Connected Action rail spur/ rail cars.

How will material be transported to the Connected Action Rail Spur? by trucking/rail? Over what roadways? What municipalities/counties will be affected? What are the environmental impacts of moving the

***material described above and how might it affect Dewitt specifically?
What is the environmental justice impact of this activity? (Dewitt has an active quarry at I-481 exit 2 and is the location of the CSX Dewitt Railyard exit 1 I-481 which is the area hub for commercial rail.)***

Hancock Airport - The DEIS did not include any potential environmental impact from air transportation. Hancock Airport resides in Dewitt and provides both passenger and commercial flights.

What potential changes to the Airport might be needed to handle transportation related to Micron development and operations?

Recommend involving the Town of Dewitt in conversations related to Hancock Airport and transportation.

What are the potential environmental impacts of any changes in Air Transportation Commercial and Passenger related to Micron development and Operations? Include potential Environmental Justice Impacts related to flight paths, air pollution, traffic, housing, other.

Waste Disposal - it is unclear where waste that Micron generates will be transported, both hazardous and non hazardous. Both types of waste are likely to travel by truck or rail through Dewitt using I-481, I-690, CSX Rail Hub, and surface roads.

Provide details of waste disposal travel corridors and potential environmental impacts on the Town of Dewitt including during all phases of construction and eventual operation.

Housing - there is an expectation that upwards of 25,000 new households will reside in the region as a result of Micron.

What is the estimated Greenhouse Gas Emissions and Climate Change impact of these households? What will be the impact on Dewitt?

Environmental Justice (ES p 44)

Micron DEIS looked at a 5 mile radius of the proposed project and ¼ mile radius of connected actions and concluded that there are no significant adverse effects from the project. Micron outlines benefits to the region extending for 5 counties. *If they claim benefit for 5 counties, then they should look at the potential for environmental justice impact for 5 counties. Analysis of Environmental justice impacts should include a 5 county look for potential harm caused by connected actions (rail, highways,*

extending water/fossil fuel/electric services), air and water pollution, changes to water flow, climate change from higher greenhouse gas emissions, longer traffic wait times, new housing developments, change in traffic flow, to name some potential impacts.

Dewitt is within the 5 county area expected to benefit from Micron. What is the potential for adverse environmental justice impact for Dewitt over the lifetime of the project?

Other Sustainability Concerns related to the DEIS:

Lack of a Sustainability Plan (Micron has a published table of goals and aspirations, but these are not robust in detail to constitute a Sustainability Plan)

<https://assets.micron.com/adobe/assets/urn:aaid:aem:94c92463-9bf1-4311-9465-d057307c8955/renditions/original/as/Micron-environmental-goals-and-aspirations-2025.pdf>

DACC review of the DEIS finds that Micron is not fulfilling Requirements of Green CHIPS legislation. Please provide a Sustainability Plan that is based on criteria below, with plans to update it in a meaningful way as design plans and construction and operations change, and before each Phase begins, as well as if new technology becomes available.

As part of New York State's **Green CHIPS** legislation, championed and **signed into law** by Governor Kathy Hochul, **Micron** will be required to manufacture semiconductors under leading-edge sustainability commitments designed to mitigate its greenhouse gas emissions and environmental impact, including utilizing 100% renewable energy, attaining LEED Gold status, and committing to greenhouse gas emission targets and reporting.

Micron will be required to submit a Green CHIPS Sustainability Plan in compliance with the Green CHIPS program regulations, subject to the approval by ESD. Micron will strive for the highest standards practicable and that, at a minimum, will include commitments to:

- Utilize 100% renewable energy for electricity and maintain that 100% renewable energy for electricity supply for the duration of the expected 20-year duration of the project
- Achieve a minimum Gold LEED status for all chip fabs and office buildings, with commercially reasonable efforts made to achieve Platinum status at all Fabs and office buildings
- Commit to meeting applicable and mutually agreed GHG emissions standards specific to the Fab Complex that are reasonable and achievable given the state of technology advancements
- Install on-site renewable energy systems and on-site battery storage systems to contribute to the project's energy needs to the extent practicable, including for resilience, peak-shaving, grid benefits, and other applications
- Where feasible and cost effective - utilize green hydrogen to displace/replace natural gas and gray hydrogen consumption, support /participate in New York's federal Hydrogen Hub proposal; and pursue other clean measures such as geothermal heat pumps for space heating and cooling loads
- Adopt other mitigation measures for GHG process emissions where practicable
- Incorporate energy efficiency and electrification where feasible throughout the term
- Encourage contractors to utilize, to the extent practicable, low-carbon construction vehicles and equipment and incorporate low-carbon building materials (green steel, green cement, etc.) into construction
- Commit to environmentally sound practices, including green infrastructure such as permeable pavement, stormwater runoff management solutions, and sustainable wastewater management
- Report annually the project's progress related to the commitments made in the agreement and on its greenhouse gas emissions

Community Expert Advisory Conservation/Sustainability Commission-

In early days of community engagement, Micron involved community members and environmental organizations in conversations about Sustainability. These conversations have ceased to occur in any meaningful way. Micron has indicated a desire to build and operate sustainably, but there is much that could be sustainable that is not present in the DEIS. Micron has an obligation of sustainability as part of receiving financial support through the NYS Green CHIPS Act.

<https://esd.ny.gov/micron-green-chips-sustainability-requirements#:~:text=As%20part%20of%20New%20York,impact%2C%20including%20utilizing%20100%25%20renewable>

Require formation of a Community Expert Advisory Conservation/Sustainability Commission involving Micron, community members, municipalities, and environmental organizations to convene regularly to review sustainable solutions in keeping with the goals of the Climate Leadership and Community Protection Act and New York State Environmental Amendment to the constitution, NYS Green CHIPS Act and others that may guide best sustainable practices for a project of this magnitude. This project will be 16 years in design and construction, with decades of operation. It is impossible to know what technology and other avenues there will be to achieve net zero carbon building, pollution free combustion in chip fabrication, clean wastewater, reduced and reclaimed water use, as some examples.

Require that new technologies be implemented as they become available.

In summary, these are the final conclusions and recommendations of the Dewitt Advisory Conservation Commission. Central New York has experienced and continues to live through the aftermath of environmental exploitation and destruction from industrial development, always preceded by the promise of “economic growth” and “job creation” (e.g. Solvay Process, Allied Chemical). Micron needs to develop and implement more comprehensive Sustainability and Conservation plans for their project that will both protect and preserve central New York’s environment and quality of life throughout the duration of construction and operations of the project. The estimates of resources that will be consumed on a daily basis are staggering and have been increased in recent weeks (<https://www.nyruralwater.org/news/micron%E2%80%99s-unmatched-environmental-impact-clay-chip-fabs-doubles-latest-estimates>)

A reconsideration of alternative actions, or a final decision of no action may be reasonable conclusions after review of this and other DEIS comments.

We appreciate your review of these comments and detailed responses.

Respectfully submitted by Sonia Y Kragh, MD and Angela Weiler, MLS, on behalf of Dewitt Advisory Conservation Commission, Town of Dewitt, New York.

Please reply to soniakragh@gmail.com.

From: Tiffany Latino-Gerlock <tlatinogerlock@macny.org>
Sent: Friday, August 8, 2025 4:07 PM
To: chipsnepa@chips.gov
Subject: [EXTERNAL] Statement on the Micron DEIS

Good evening,

Please see below a statement from MACNY, The Manufacturers Association of Central New York. Please let me know if you have any follow up questions. Thank you.

The Micron Technology Draft Environmental Impact Statement (DEIS) for the planned construction of a mega semiconductor fabrication plant in the Town of Clay, required under state and federal law, marks a significant milestone for this transformative project. Under CHIPS legislation, Micron is required to operate under rigorous sustainability standards, including greenhouse gas reduction and reporting commitments.

MACNY welcomes the report's release and the opportunity for crucial community input. This document reflects years of careful collaboration among Micron and public agencies to drive the Micron project forward while safeguarding the region's vital natural resources through research, accountability, and public engagement.

Micron has the potential to create thousands of good-paying, advanced manufacturing jobs, establish our region as a hub for semiconductor manufacturing, and attract a robust network of supply chain companies. Beyond its economic impact, the Micron project will significantly strengthen national security and bolster U.S. competitiveness. The DEIS is a vital step to ensure that the project moves forward responsibly, balancing economic growth with community well-being.

Tiffany Latino-Gerlock

Director of Government Relations

MACNY, The Manufacturers Association & The Manufacturers Alliance of NYS

315-474-4201 ext. 13

www.macny.org

From: [Elizabeth Levernosh](#)

Mail received time: Fri, 8 Aug 2025 09:29:20

Sent: Fri, 8 Aug 2025 05:28:57

To: [chipsnepa](#)

Subject: [EXTERNAL] Micron

Importance: Normal

Sensitivity: None

Archived: Thursday, August 14, 2025 9:58:10 AM

Life in CNY will change with micron coming in. The additional traffic, population and industrial growth I can adapt to and live with as it will ultimately be a plus for the area I believe. (Although I'm stumped as to how an already failing electric grid, sewer system and water system will handle this added strain???)

What I'm truly worried about is the impact of micron on our air and water. We have some of the most abundant, clean water in the country! Our many lakes, rivers and streams are a huge plus to living here and growing our tourism. We can not risk becoming another Flint, Michigan! I hope that the government is taking a full and careful look at ways to SAFELY bring micron to CNY so it is a positive for our area.

Thank you, Elizabeth Levernosh

Sent from my iPhone

From: Jessica Davern <Jessica.Davern@OswegoCounty.com>
Sent: Friday, August 8, 2025 2:48 PM
To: chipsnepa@chips.gov
Subject: [EXTERNAL] Comments of the County of Oswego concerning the Micron Draft Environmental Impact Statement
Attachments: COMMENTS OF THE COUNTY CONCERNING MICRON DRAFT ENVIRONMENTAL IMPACT STATEMENT.pdf

Good afternoon. Attached please find the signed letter from the Chairman of the Oswego County Legislature.

Jessica Davern
Deputy Clerk of the Oswego County Legislature
315-349-8230



JIM WEATHERUP
CHAIRMAN
EMAIL: james.weatherup@oswegocounty.com

BETSY SHERMAN-SAUNDERS
CLERK OF THE LEGISLATURE
EMAIL: betsy.saunders@oswegocounty.com

August 8, 2025

VIA E-MAIL TO: chipsnepa@chips.gov

Onondaga County Industrial Development Agency
ATTN: Micron Project
335 Montgomery Street, Floor 2M
Syracuse, NY 13202

**Re: Comments of the County of Oswego Concerning the
Micron Draft Environmental Impact Statement (DEIS)**

To Whom it May Concern:

The County of Oswego welcomes the opportunity to comment on the DEIS for the Micron project (hereinafter "Project") and would offer the following by way of comment. Also attached is a spreadsheet, incorporated herein by reference, with more specific comments and concerns regarding the DEIS.

By way of background, Oswego County supports investment in Central New York and the attendant economic drivers, jobs and opportunities investment can bring to the region. However, any development must also be considerate of the natural bounty this region offers and take steps to protect the vital natural resources we all enjoy and rely upon. Tourism is a huge portion of the local economy of Oswego County and a large part of tourism relies upon our abundant natural resources including our rivers and lakes. Visitor spending in Oswego County totaled \$228 million in 2023.

Oswego County estimates approximately 2,748 jobs were supported by direct and indirect tourist expenditures in 2022. Anglers (including local residents) generated \$192,734,697 in total economic impact in Oswego County in 2023, supporting 934 jobs. Oswego County values its abundant natural resources including the Oswego River and Lake Ontario and, as such, believes that any development should be mindful of potential impacts upon those resources. Minimizing potential environmental impacts in Onondaga County and burdening neighboring jurisdictions with new, or other, impacts stemming from the Project should, at a minimum, require input and review together with the affected jurisdictions.

The Oswego River crosses Oswego County and portions of the Seneca and Oneida rivers flow into the Oswego River. The majority of the surface of Oneida Lake lies within the boundaries of the County of Oswego which reaches the southern shoreline of that lake. Oswego County values its water resources and is concerned about possible impacts stemming from the Project and inadequate consideration as to how those activities may affect this county and surrounding areas.

DEIS Procedural Concerns

Oswego County and the towns, cities and villages comprising same, were neither listed as an involved party nor an interested party in the Project's review process which was cloaked under secrecy until released by

the County of Onondaga Industrial Development Agency (COIDA). The lack of information to, and input from, Oswego County is a concern as the magnitude of this Project and its impacts upon electricity, water, wastewater, housing, traffic, infrastructure and the environment stretch far beyond the borders of Onondaga County.

Not all consequences from a Project of this size are welcome and some cannot be avoided. However, at a minimum, adjoining jurisdictions should have been involved in the environmental review process from the onset and the failure to include those jurisdictions in the County of Oswego from the onset is a significant oversight. It is difficult to posit there was a hard look at all potential environmental impacts for the Project when part of the solution to potential problems in Onondaga County was to have the Project look outside of municipal boundaries to mitigate impacts in surrounding areas and, thereby, causing potential adverse concerns/issues in other locations.

DEIS Substantive Concerns

Wetlands Studies and In-Lieu Wetland Banking

Of primary concern, the DEIS presupposes that wetland impacts for the Project will be mitigated, in whole or in part, by in lieu/banking projects in Oswego County. Oswego County would submit that there has been insufficient review of the impacts of this program as concerns this county. Further, there has been insufficient notice to and/or involvement of impacted jurisdictions within Oswego County.

Oswego County has already seen hundreds of acres acquired by a third party, The Wetland Trust, in connection with the Project. The Wetland Trust is not a trust in the traditional sense of the word but, rather, is a non-profit corporation with apparently no memberships and a small board of directors. This county understands the Trust has received direct funding in connection with this Project to acquire lands outside of the County of Onondaga. The Trust wetlands in this county are also located within the Oswego County Soil & Water Conservation District which was not consulted by the Trust specifically as to this Project.

The Trust approached the Soil and Water Conservation District in 2023 and there was no mention of the Project. Further, this was prior to the Trust's wetland mitigation purchases for the Project becoming public knowledge. In the Trust's conversations with the Oswego County Soil & Water Conservation District, the Trust stressed that their "clients" were the various species of wildlife which would benefit from wetlands. The Trust's representatives asked about specific properties and, if the District knew of any landowner whom may be interested in selling, to pass along the contact information for the Trust. It was later realized that the inquiry was connected with the Project but not through any formal DEIS notice. It is unknown, at this point, whether the Trust has independently complied with SEQRA and other regulations regarding its proposed actions in Oswego County. It is also unknown whether these new wetlands will be open to public recreation or hunting.

The removal of viable agricultural lands from production, and their conversion into permanent wetlands, harms the agriculture sector in Oswego County. Further this also hinders any possible future development of these lands for housing or other uses. Lastly, this also serves to remove acreage from the taxable portion of the rolls. The future fiscal impact upon the county and towns in which the wetlands are being acquired for the Project is manifested through not only the loss of current tax revenues but the potential loss of future development and revenues in those towns where the wetlands are being created. There are no plans in the DEIS regarding host community benefits in Oswego County for the potential losses. Oswego County and local jurisdictions are also exploring options regarding the wetlands recently obtained by the Trust.

By way of illustration, the following is a list of properties held by The Wetlands Trust in the County of Oswego a large portion of which are located in one town, the Town of Schroepel:

SWIS

Tax Map Owner
Taxable Value Acres

353289	292.00-01-10	The Wetland Trust Inc.	13,671	30.41
353289	292.01-01-15	The Wetland Trust Inc.	50,000	1.27
354400	257.00-01-08	The Wetland Trust Inc.	0	100.9
354400	239.00-03-08	The Wetland Trust, Inc.	25,000	85
355489	257.00-01-06.02	The Wetland Trust Inc.	0	32.5
355489	315.00-01-29	The Wetland Trust Inc.	0	80.11
355489	315.01-01-04	The Wetland Trust Inc.	0	181
355489	256.00-04-14	The Wetland Trust, Inc.	0	174.55
355489	256.00-04-14.01	The Wetland Trust, Inc.	0	10
355489	304.00-02-03.1	The Wetland Trust, Inc.	0	350.22
355489	274.00-02-04.09	The Wetland Trust, Inc.	0	52.2
355489	274.00-02-04.11	The Wetlands Trust Inc.	500,000	96.69
355600	149.00-01-19.15	The Wetland Trust Inc.	30,000	31.23

Note: Due to the timing of acquisition and taxable status date, some properties may have a taxable value because an exemption has not been triggered; exemptions also vary by assessing unit.

Under the pre-2025 DEC wetlands criteria, Oswego County hosted approximately 135,521 acres of mapped and informational wetlands and an additional 79,694 acres of regulated adjacent wetland zones. Approximately thirty-four percent of the total acreage of those 215,215 acres of Oswego County was already covered in regulated wetlands. The total herein is likely much higher due to unmapped areas meeting additional wetland criteria (i.e. urban areas, etc.) and the newly adopted, expansive DEC wetlands definitions. It is unknown why prime agricultural and development lands were acquired in part to convert to wetlands instead of simply acquiring existing wetlands in this county.

From the DEIS, Oswego County is expected to see growth of households up to 9.7%, or approximately 4,500 homes, by 2041. (DEIS, Table 3.15-5, p3-492). It is noted that the Town of Schroepfel is expected to see growth of households up to 10.4%, or approximately 350 homes. (EIS, 3.15.3.2, p. 3-492). The Trust acquiring wetlands in connection with the Project removes that acreage from the potential for future development. Additionally, the new, expansive DEC wetlands regulations further hinder the ability to develop lands in proximity to those wetlands in the Town of Schroepfel.

From Oswego County's perspective, the DEIS should have employed mitigation measures and considered reasonable alternatives within Onondaga County, and the within the same watershed, for the Project instead of pursuing them in other areas.

Public Health Concerns Specific to Additional Wetlands Being Created

Additionally, the DEIS did not solicit information about, nor does it consider, the impact upon public health in Oswego County as concerns the creation of new wetlands connected to the Project. Oswego County has conducted surveillance for mosquito-vectored diseases for over thirty years through its Department of Public

Health. Mosquitoes can carry diseases or viruses which can impact the health of the public at large and livestock. These include Eastern Equine Encephalitis (EEE) and West Nile Virus. With global warming, it is anticipated that other mosquito-borne illnesses not previously seen in this county may also appear and, in turn, drive additional public health related costs.

The Oswego County Health Department regularly conducts aerial spraying of parts of Oswego County including to mitigate the potential harm to the public and livestock from these viruses. Other initiatives such as public education and the distribution of “dunks” are also undertaken by the Health Department. Presently, this county is spraying about 10,000 acres for EEE and West Nile Virus.

The proximity of the new wetlands related to the Project to existing and future residential developments in this county is a concern and does not appear to have been considered under the DEIS. Also, no consideration in the DEIS was given to the potential increased costs which could be incurred by Oswego County in mosquito surveillance and spraying programs in connection with the additional 400 acres of wetlands to be created and along with adjoining acreage.

Historical mosquito vector spraying costs alone are included in the chart below. This does not include other, related costs such as testing, surveillance, outreach and public health education/ response.

Oswego County Mosquito Spraying Costs and Events Summary (2013–2024)

Year	Spraying Cost		Number of
	Spray	Locations	
2024	\$34,348	1	
	TH		
2023	\$38,178	1	
	TH		
2022	\$64,561	2	
	TH (1), Palermo (1)		
2021	\$73,206	2	
	TH (1), Palermo (1)		
2020	\$34,097	1	
	TH		
2019	\$108,962		3
		TH (2), Palermo (1)	
2018	\$34,416	1	
	TH		
2017	\$28,046	1	
	TH		
2016	\$0		0
	—		
2015	\$55,524	2	
	TH (2)		
2014	\$219,415		Unknown
		Not specified	
2013	\$194,310		Unknown
		Not specified	

N.B.: TH = 3 Mile Bay Wildlife Management Area in Hastings, West Monroe & Constantia
Palermo = Portions of Palermo, Mexico & Hastings

In that time-frame, there have also been various exposures to livestock and humans and one human case which resulted in a fatality from Eastern Equine Encephalitis in 2014.

SOLID WASTE

The DEIS mentions several regional resources for solid waste including Bristol Hill Landfill and the Oswego County Energy Recovery Facility both located in the Town of Volney in Appendix K-2. The County of Oswego has, under local law, implemented Flow Control and bars the importation of solid waste from outside of Oswego County. This local law was challenged after adoption and the U.S. Court of Appeals for the Second Circuit subsequently upheld the local law in 2013 in the matter of *JWJ Industries, et al. vs. Oswego County*.

The DEIS appendix is a silent on the existence of flow control in Oswego County and the fact Oswego County prohibits the importation of out-of-county waste. Further, Oswego County's Solid Waste Management Plan makes no assumptions or forecasts for the Project in particular or out-of-county wastes in general. To the extent the Project relies upon other counties for solid waste disposal (and the attendant environmental impacts to haul and dispose of solid waste to other locations), Oswego County would submit that the DEIS review is inadequate and any reliance insofar as Oswego County's solid waste system is misplaced.

COUNTY AND TOWN ROADWAYS

Oswego County maintains over 500 lane miles of county roads and approximately 120 county bridges or culverts including all bridges or culverts over 25 feet on town roads. Oswego County maintains, in part, the Minetto Bridge spanning the Oswego River and the Hinmansville Bridge, under state jurisdiction and near the county line, connects to County Route 46. State Routes 48 and 481, and County Route 57, also cross county lines into Oswego County. Oswego County would submit that the DEIS should have considered the impact from increases in traffic counts and accelerated maintenance schedules related to the Project in this county. Infrastructure related improvements from Project-related traffic within this county will likely be necessary given the proximity of the Project to Oswego County and its local jurisdictions.

WATERWAYS/WATER QUALITY

Oswego County's reliance upon its waterways for public water, recreation and fishing is of paramount importance. It is submitted that the DEIS process is lacking information regarding potential impacts upon rivers within Oswego County as the discharge from new wastewater facilities in Onondaga County ultimately will end up in waterways in Oswego County.

The county understands, from initial estimates, the Project's daily needs for water range from 20 million gallons per day at the onset to 48 million gallons per day when the project is completed. This county further understands that the Project's projections for industrial wastewater range from 8 million to 20 million gallons per day and when fully operational that could increase to 42 million gallons per day.

This county has seen a resurgence in many protected species due to, in part, improvements in water quality and fish stocks. Many migratory waterfowl stop in Oswego County and this county believes that further study of the potential impacts of the Project within Oswego County is warranted to ensure there are no adverse impacts on rare or state-listed avian species and fish stocks.

Even a slight change in water quality or temperature can have major impacts upon fish stocks and the environment. Oswego County submits there has been insufficient review as to potential impacts of these discharges into the waterways which flow in and through Oswego County. This county is also concerned about potential increases in contaminants from the Project such as PFAS, increases in water temperatures and decreases in overall water quality. The potential impacts upon public water sources, water quality and fish stocks in the waterways of Oswego County merit thorough review and input from jurisdictions in this county which is lacking in the DEIS.

STANDARD OF REVIEW

In compliance with the substantive and procedural requirements of SEQRA and other applicable regulations, a lead agency must prepare a DEIS and FEIS to analyze the environmental impact and any unavoidable adverse environmental effects of the project under review.

In assessing compliance with the substantive mandates of SEQRA, of critical concern is whether the lead agency COIDA identified the relevant areas of environmental concern, took a "hard look" at them, and made a reasoned elaboration of the basis for its determination. Literal compliance with both the letter and spirit of SEQRA is required and substantial compliance will not suffice.

When viewing the DEIS under a rule of reason approach, Oswego County views the wholesale disregard or discounting of potential impacts in Oswego County from wetland banking in connection with the Project as an error. Oswego County's position is that the mitigation of adverse impacts from the Project should have occurred in Onondaga County. COIDA knew or should have known wetland banking was occurring in other jurisdictions and should have, at a minimum, sought input and included those jurisdictions in the process from the onset. Oswego County does not believe there was due regard in the DEIS about other impacts in Oswego County stemming from the Project such as potential changes in traffic, discharges to the waterways of Oswego County, public health impacts and the like.

Oswego County does not believe it is the only surrounding government sharing this opinion and would like to see revisions to the DEIS to better account for adverse impacts in surrounding jurisdictions. Our disagreement with some of the alternatives proposed for the Project stems from the fact we do not believe OCIDA undertook the required hard look at all reasonable alternatives to the Project which is evident in the lack of notice to local jurisdictions from the onset.

Thank you for the opportunity to comment on the DEIS for the Project.

Sincerely,

A handwritten signature in cursive script that reads "Jim Weatherup".

James Weatherup, Chair

(Encs.)

OSWEGO COUNTY COMMENTS REGARDING MICRON DEIS

Number	Page	Section	Title	Comments
1	60	Table 1.2-1	State and Local Involved Agencies	Oswego County and its local jurisdictions in proximity to the Project are not listed.
2	124	3.1.2.3	Protected Farmland	Omits farmland impacts in Oswego County.
3	141	3.1.3.2	Farmland Conversion	Omits farmland impacts in Oswego County.
4	145	3.1.3.2	Growth Inducing Effects	DEIS should address substantial housing impacts upon local municipalities, including in Oswego County.
5	148	3.1.4	BMP and Mitigation Measures	There are no mitigation measures for direct and ancillary Project impacts in Oswego County.
6	205	Figure F-24	Proposed Compensatory Mitigation Sites	Oswego County, Oswego County Soil & Water Conservation District and Oswego County Farmland Protection Board should have been involved/better informed.
7	246	Table 1.2-1	Projected Land Cover Loss Due to Induced Growth by 2041	DEIS omits land cover losses in Oswego County.
8	600	3.15.3.2	Funding for Local Governments and Taxing District	The Project will result in growth in Oswego County but also related Oswego County and local costs relating to infrastructure, traffic/roads, police, fire etc. and no funding is earmarked for Oswego County.
9	606	Table 3.15-5	Induced Household Growth Projections Exceeding	It would appear the ten percent cap will be exceeded in Oswego County based upon similar estimates in Onondaga County and Oswego County's proximity to the Project.
10	607	3.15.3.2	Real Property and Housing	The Project will cause short-term challenges in the local and regional housing markets and, in turn, will require additional municipal investment in infrastructure which will outpace existing municipal plans, budgets/capital projects for repaving, bridge replacement, etc.
11	612	2.15.3.2 2nd Paragraph	Funding for Local Governments and Taxing Districts	It is unknown whether anticipated growth and the tax revenue generated from same will exceed the new and additional costs to be incurred by Oswego County and its local governments because of the Project.
12	616	3.15.4	Mitigation Measures	The only local initiatives identified are in Onondaga County, none in Oswego County as a neighboring/adjacent jurisdiction.

OSWEGO COUNTY COMMENTS REGARDING MICRON DEIS

13	624	3.16.2.2	Low-Income Communities in Study Area	Low income areas have not fully been reviewed as only Onondaga County considered. Oswego County has low income areas in proximity to the Project.
14	645	Table 3.17-1	Summary of Effects	Additional necessary utilities like water and sewer should also have been considered along with electricity.
15	659	4.3.3	Water Resources- Wetland	Mitigation of the disturbed wetlands by wetland banking in Oswego County locates wetlands to a different watershed than the Project.
16	680	4.3.15.4	Local Governments and Taxing Districts	There will be delays in new development caused by the need for new infrastructure and the need to fund same. Current residents will likely be burdened with additional taxes/fees to fund infrastructure improvements.
17	682	5.1	Unavoidable Significant Adverse Effects- Water Resources	It is stated that the wetland mitigation will be in the same watershed but this does not appear to be the case.
18	716	8.3 & 8.4	Involved and interested Agencies	Oswego County should be included.
19			General Questions/Comments	The need for high density development will be hindered by how quickly infrastructure and other services can be put in place.
20			General Questions/Comments	The Project DEIS states there are substantial impacts in Oswego County, but does not sufficiently consider or identify them.
21			General Questions/Comments	Traffic studies stop at the Oswego County line. Obviously the potential impact from increased traffic crosses into Oswego County.

OSWEGO COUNTY COMMENTS REGARDING MICRON DEIS

Section	Report Page	PDF Page	Header	Quote	Notes/Thoughts/Questions
0.3	0-5	34	No Action Alternative	"The Existing utility authorities would not undertake utility improvements or need to obtain easements for the Connected Actions."	Admits that local utilities would not need to conduct any utility improvements (including water and sewer) if this project were to not happen. Whereas later on in the report it says that these utilities have identified improvement and would be conducting these improvements regardless of the project and therefore there are no significant impacts. Conflicting statements.
0.3	0-7	36	Water Resources	Speaks to wetland mitigation within 9-miles of the site	The discussion of the construction of these wetland sites is centered around the need for mitigation. The report does not expand upon the proposed mitigation to consider the impacts on the areas where the wetland mitigation is occurring - loss of land use, potential rezoning of the land, loss of potential future tax revenue or use for residential housing
0.3	0-7	36	Biological Resources	"The Preferred Action Alternative has low potential to result in significant growth inducing effects on biological resources in the five-county region over time."	The report states that the growth inducing impacts of the project will result in continued development of the 5-county region, resulting in additional land use/clearing which the report states has the potential to affect historical architectural properties and archaeological resources. This same development will also result in impacts to threatened and endangered species due to the clearing of land and trees to support this development (residential and otherwise), but the report does not identify/mention these potential impacts instead stating that there will be no impact.
0.3	0-8	37	Biological Resources	Additionally micron proposes purchasing property for permanent protection and restoration of habitat.	The report does not consider the environmental impacts on the areas where the grassland/habitat mitigation is occurring - loss of land use, potential rezoning of the land, loss of potential future tax revenue or use for residential housing
0.3	0-11	40	Utilities and Infrastructure	The Proposed Project would have no significant adverse effect on water usage and capacity, as necessary system upgrades, permitting, and infrastructure development led by OCWA and local water authorities are expected to maintain adequate capacity. Wastewater treatment needs, including both sanitary and industrial wastewater, would be accommodated by existing and planned infrastructure, including construction of the IWWTP, avoiding any significant adverse effects on wastewater treatment capacity.	The report speaks to the potential water and wastewater impacts of the proposed project only and does not speak to the potential water and wastewater impacts the Connected Actions or growth inducing effects. The report mentions "planned upgrades" by OCWA and OCDWEP but does not consider potential upgrades necessary to support the growth inducing effects on other smaller municipal utilities, including those in Oswego County. What other local water/wastewater authorities has the author coordinated with? None were specifically mentioned in Oswego County, though the report later states that these areas of Oswego County are likely to see growth inducing effects which may strain existing public water and wastewater infrastructure, or produce a need for expanded infrastructure. The Report does not discuss wastewater treatment capacity or water capacity significant adverse impacts of development in areas without public infrastructure

OSWEGO COUNTY COMMENTS REGARDING MICRON DEIS

0.3	0-12	41	Transportation and Traffic	<p>Report speaks to multiple significant measures needed to mitigate transportation and traffic impacts - including construction or widening of roads. Report also states that the recommended mitigation measures are within the jurisdiction of federal, state, and local transportation agencies and would be subject to detailed design and approvals</p>	<p>Report does not seek to quantify the other environmental impacts of these mitigation measures - widening of roads is likely to have wetland impacts, impacts to trees and habitat for threatened and endangered species etc which was not discussed in the report.</p> <p>Furthermore, the report states that local agencies may be responsible for these mitigation efforts. Impacts on local municipalities which will be responsible for this work has not been identified.</p> <p>The report speaks to significant traffic along Caughdenoy Road but only discusses traffic mitigation measures within Onondaga County. It does not mention potential mitigation measures necessary to facilitate increased traffic patters at the intersection of Caughdenoy Road, County Route 12 and County Route 33 (the hamlet of Caughdenoy) which may serve as a major intersection for traffic heading to the micron campus from areas north of the Proposed Project. It also does not speak to potential widening of the County Route 33/Caughdenoy Road bridge crossing Oneida River from Onondaga County into Oswego County, including addition of sidewalks and bike lanes. The Report does not discuss potential traffic mitigation measures necessary in Oswego County and the resulting environmental impacts of these mitigation measures.</p>
0.3	0-13	42	Visual Effects and Community Character	<p>Report states that the preferred action will result in changes to community character by increasing traffic, visual effects, and the effects of inducted growth by changing from low-density, rural, undeveloped area to a site with a large manufacturing facility.</p>	<p>This does not speak to the significant adverse impacts of the induced growth of the area - including not just the construction of the preferred action but the spin-off impacts of other commercial and residential growth in the area - added density, less rural character etc. This also does not speak to the impacts on the community character of other surrounding areas which may experience a significant increase in density due to residential growth near the site (including Oswego County).</p>

OSWEGO COUNTY COMMENTS REGARDING MICRON DEIS

0.3	0-13 and 0-14	42 and 43	Community Facilities, Open Space, and Recreation	<p>"Construction and operation of the Proposed Project would not result in any significant adverse effects on police services, fire services, EMS, healthcare facilities, or schools, nor would construction and operation of the Proposed Project and Connected Actions have any significant adverse effects on open space or recreational resources. The Preferred Action Alternative would not result in significant adverse growth inducing effects on police services, EMS, healthcare facilities, schools, or open space or recreational resources, but would potentially have significant adverse effects on volunteer fire services in the five-county region. ... Micron would engage closely and collaboratively with local fire departments, including Clay Fire and Cicero Fire, to familiarize local fire service personnel with any potential Proposed Project construction hazards... To address the potential significant adverse effect on volunteer fire services due to the induced growth associated with the Proposed Project, including on Clay Fire and the Town of Clay's fire response capacity, Micron would commit to pay for and support ongoing Micron-related training efforts with Clay Fire and other local fire departments as a mitigation measure."</p>	<p>1. Police Services - The Report states that there is no impact to police services. Increased residential and commercial growth, increase in the temporary construction workforce may result in increased need for police services. The report speaks to significant traffic impacts which may result in increased accidents requiring police response. Additional population may also increase need to respond to other police related matters.</p> <p>2. EMS - similar response. Will result in increased need for trained EMS personnel and additional EMS resources, which are limited in the area.</p> <p>3. Healthcare Facilities and Schools - Report states that the project will result in an increased population of 60,000+ people which may tax the existing healthcare systems and schools. Schools may need additional teachers, resource staff, and transportation staff. Transportation routes may need to be altered to facilitate transportation of students through more densely populated areas (induced growth) or around increased traffic patterns. Additional healthcare staff including doctors, nurse practitioners, and nurses may be necessary to treat the increased population. Similarly, there will be a similar impact on childcare facilities, which is not mentioned. These environmental impacts are not mentioned.</p> <p>4. Fire Services - There is no mention of the Caudhdenoy Fire Department, Central Square Fire Department, or Hastings Fire Department, which are all located within 5-miles of the Proposed Project and will likely be first responders in the case of an emergency. These departments will also need training and potentially specialized equipment to respond to needs at the Proposed Project Site. This is not mentioned. Additionally, these departments are supported mostly by volunteers and the local townships, and already struggle with membership and funding. Further, as mentioned for police and EMS services, increased population, traffic, and residential density will increase the need for fire personnel and will likely result in an increase in calls which departments must respond. These environmental impacts are not addressed.</p>
0.3	0-15	44	Environmental Justice	<p>Report looked at environmental justice and low income disadvantaged communities within a 5-mile radius of the project area</p>	<p>Report states that there will be impacts to these communities by an increased demand for housing and increased rent - but identifies these impacts as temporary. The facility will be permanent, and the need for housing within a short commutable distance will be permanent, therefore these impacts on these communities should be considered permanent. Increased housing demand and increased rent prices may impact these communities and potentially impact their presence in the project area. These permanent environmental impacts are not discussed.</p>

OSWEGO COUNTY COMMENTS REGARDING MICRON DEIS

0.5	0-15 and 0-16	44 and 45	Cumulative Effects	<p>"Across all the environmental resources analyzed in this EIS, none of the ongoing or future projects with effects that are cumulative with the Preferred Action Alternative would meaningfully alter or amplify the effects of the Preferred Action Alternative, because the Proposed Project and Connected Actions are the most significant drivers of the environmental effects identified in this EIS. None of the other ongoing or future projects, either individually or cumulatively, would transform an otherwise insignificant effect of the Preferred Action Alternative into a significant effect. Nor would any of the other projects, individually or cumulatively, meaningfully exacerbate any significant effect of the Preferred Action Alternative. Accordingly, there are no significant adverse cumulative effects. "</p>	<p>The report concludes that the Proposed Project will not have significant adverse impacts on environmental resources such as utilities, wetlands, habitat, community resources (except Fire Services which the report states has a significant impact) etc. However, the report only typically considers the impacts of the Proposed Alternative and not the added cumulative impacts of the induced growth. While the report states that there are no impacts to water resources because OCWA already plans upgrades to meet the sites needs, it previously stated that OCWA would not undergo those upgrades should the No Action Alternative be pursued. Therefore, those environmental impacts due to the planned OCWA upgrades are an environmental impact which should be considered. Further, it does not consider the needs of the surrounding areas and the potential water demand impacts of increased development density outside of the OCWA service area. Similarly, the report states that there are no impacts to wastewater treatment resources because OCDWEP already plans upgrades to meet the site's needs. However, it does not consider the added wastewater treatment needs of the surrounding areas given increased development pressure and density. Specifically, it does not consider the wastewater treatment impacts/enviornmental impacts on areas that have increased development and no access to public wastewater infrastructure which rely on private septic systems. Further, it does not consider the impact on public wastewater utilities outside of the OCDWEP service area which will also be impacted by increased growth, demand, and density. These environmental impacts are not considered. Following discussion of these environmental impacts, it may be determined that there are significant cumulative effects which turn a "no impact/no significant impact" into a significant impact.</p>
0.6	0-16	45	Unavoidable Significant Adverse Effects	<p>Water Resources, Biological Resources, Transportation etc.</p>	<p>The report does not consider the adverse impacts of the mitigation efforts discussed including the transformation of usable land into wetlands and habtiats for permanent protection, which will not be able to be used for agricultural, residential or commercial purposes which they may currently be zoned for. Additionally, the report speaks to the efforts of NYSDOT to mitigate transportation impacts within the County and region but does not reference the adverse impact on local authorities who must mitigate local roads for the increased traffic and differing traffic patterns. These environmental impacts are not identified and discussed.</p>

OSWEGO COUNTY COMMENTS REGARDING MICRON DEIS

0.7	0-18	17	Irreversible or Irretrievable Commitments of Environmental Resources	The report speaks to the development of the Micron campus site making it irretrievably lost lands which could no longer available for development. It also says that a majority of the proposed utility upgrades will provide capacity which will be irretrievably lost because it is essentially earmarked for use by the proposed project.	The report does not speak to the lands which are irretrievably lost because they will be used as part of the mitigation efforts and will be turned into wetlands or habitat sites and will no longer be available for development. It doesn't speak to the tax monies which will be irretrievably lost to those municipalities (including Oswego County, townships, and schools) because those sites will never be used for a development purpose, residential, commercial or otherwise. Regarding the utilities, the report states that the capacity increase of water and wastewater treatment will be lost because it is to be used by the proposed project, meaning those capacity increases will not benefit additional development/spin-off growth and therefore potential future upgrades may be needed to serve those additional developments. The report identifies traffic mitigation measures including the widening of roads, which makes the land irretrievably lost lands, which are not identified as an environmental impact.
1.2.3	1-14	61-62	State and Local Agencies	Table 1.2.-1 State and Local Involved and Interested Agencies	Not Listed: <ul style="list-style-type: none"> - Any agency in Oswego County including Oswego County, Oswego County Highway Department, Oswego County Community Planning, Town of Hastings, Town of Schroepfel, Village of Central Square, Village of Pheonix, Town of Volney, Town of West Monroe, Town of Constantia - Any other county in the 5-county region identified - Impacts to snowmobile trails identified but no snowmobile club is listed as an interested agency. -Oneida County which is not listed within the 5 county region studied but is located within 30 minute commuting distance of the proposed Micron site
1.4	1-16	63	Permits, Approvals, and Consultations	Table 1.4-1 Permits, Approvals, and Consultations	No agencies are listed as needing to provide permits, approvals, or consultations for the identified mitigation measures including wetland/habitat construction, roadway resconstructions etc. County and local highway departments would need to provide permits for work on county and local roads. Planning departments would need to provide approvals for land rezoning, parcel subdivisions or merges, and planned projects. This includes Oswego County and the Towns of Hastings and Schroepfel where the proposed wetland mitigation is to occur.
2.1.3.3	2-23	89	Components	Figure 2.1-8 Childcare Site	The Report speaks to wastewater upgrades conducted by OCDWEP to serve the project site. Why is Micron proposing a sewage leach field at the Childcare site? Why wouldn't this site be connected to public wastewater utilities?
3.1.2.1	3-3	117	Current Land Use	Land Use Study	Why did the land use study only look at the 1-mile radius of the Micron Site? The report identifies a 5- county region which will experience growth inducing effects. It is likely that induced commercial and residential growth will occur outside of the 1 mile radius. These impacts are not studied or included in this report.

OSWEGO COUNTY COMMENTS REGARDING MICRON DEIS

Appendix F	F-72	73	Figures	Figure F-24 Proposed Compensatory Mitigation Sites	The map shows the proposed mitigation sites. The environmental impacts of creating mitigation sites at these locations have not been addressed in the EIS. Although these sites are located within the HUC-10 boundary, they are not included in the HUC-12 boundary. Sites within the HUC-12 boundary should be considered in depth. Although the proposed wetland mitigation sites are located in the same Oneida River watershed, notably they are located north of the Oneida River, on the other side of the river from the impacted Micron area, and therefore there is a detrimental impact on the southern region of the watershed since all water flows towards the river. The benefits of these wetlands and habitats will be lost to that area, irreversibly. This environmental impact is not considered in the EIS.
Appendix F	Compensatory Wetland/Stream Mitigation Plan Page 23	130	Mitigation Site Selection Process	Micron Hired The Wetland Trust, and TWT prioritized the acquisition of large, active agricultural sites	The report does not consider the impacts of lost agricultural production/ability within these agricultural sites which will be lost by converting them to wetlands as part of the mitigation efforts identified. These environmental impacts is not considered in the EIS.
Appendix C	Growth Inducing Effects C-3	136	Overview and Study Area	2022 REMI Study found that 85% of induced job growth and 90% of induced residential growth will occur in the 5 county region including Oswego, Onondaga, Cayuga, Madison and Cortland.	How was this determined? Why is Oneida County excluded from this, located less than a 30 minute drive from the Micron site, having rural nature and room for residential growth? Growth inducing effects within Oneida County should be examined and the resulting environmental impacts of induced growth within that County is not included in the EIS.
Appendix C	Growth Inducing Effects C-3	136	Overview and Study Area	The induced growth could lead to changes in population density and land use patterns, and increased residential, commercial, and industrial activity that could produce additional effects on the surrounding human and natural environment.	The study acknowledges these impacts but the DEIS does not consider, mention, or quantify these potential impacts. Additionally, the report admits that the location of Micron is likely to impact residential density patterns, but then later makes the assumption that increased residential growth is likely to occur in areas with existing density, and fails to acknowledge that these density patterns are likely to change. The changes in density patterns should be studied and the resulting environmental impacts is not included in the EIS.
Appendix C	Growth Inducing Effects C-6	139	C-1.2 Methodology and Modeling	Micron construction workers, operational workers were distributed based on existing population densities within the 5-county region	This ignores the previous statement that Micron is likely to change current densities. See previous comment.
Appendix C	Growth Inducing Effects C-6	140	C-1.2 Methodology and Modeling	SMTC met with local planning agencies to identify areas of growth in Onondaga County plus Towns of Hastings, Schroepfel, and West Monroe in Oswego County	No Oswego County planning agencies were met with or included in these discussions or projections. Results may be inaccurate or skewed to Onondaga County. Oswego County should be further considered with regards to the growth inducing impacts and these environmental impacts is not included in the EIS.

OSWEGO COUNTY COMMENTS REGARDING MICRON DEIS

Appendix C	Growth Inducing Effects C-8 through C-	141-151	C-1.2 Methodology and Modeling	Growth Inducing Houshold Estimates	<p>All of these projected growth estimates are admittedly based on current residential densities and do not take into account the Report's previous statement that the location of the Proposed Project is likely to change current residential density patterns. The February 2024 Syracuse.com article "Commuting in Syracuse: Drivers enjoy some of the shortest commute times in U.S." by Kevin Trampone found that 15.3% of workers have a commute time less than 10 minutes, 16.9% of workers have a commute time 10-14 minutes, 19.8% have a commute time of 15-19 minutes, 17.3% have a commute time 25-29 minutes. In total, the average commute time was 33 minutes and 76.9% of working adults have a commute of 30 minutes or less (52% of which have a commute time of 20 minutes or less.) The EIS and Induced Growth study does not take proposed commute times and current commute time patterns into account when projecting the areas which would receive the greatest impact from Micron.</p> <p>- Micron construction workers and Micron Operational Workers (totaling up to 12,436 employees total at the peak, may try to reside within a 30 minute commute distance. This could skew the projected density towards the northern portions of Onondaga County, Madison County, most of Oswego County, and portions of Oneida County which were not even included in the 5-County study region. These impacts are not further studied and the environmental impacts of this are not included in the EIS. The growth inducing impacts on Oneida County are not included in the study and EIS.</p> <p>- Furthermore, the projected increase in residential density within those areas due to Micron construction in-migration and Micron jobs may also potentially skew the increase in induced worker density since those areas may need increased community services (healthcare, childcare, education, fire, ems, and police services), municipal workers needed, and other spin off businesses. The induced growth study found that areas in Southern Onondaga County including LaFayette, Tully, Marcellus will see close to a 10%+ population increase based on the existing population density in those regions. Similarly, the report states earlier that the Towns of Hastings, Schroepfel, and West Monroe are likely to see increased population growth due to proximity to the Micron location (less than 5 minutes commute from Micron) but the Induced Growth Study states these areas will see an average increase of 150 households (9.9%). The</p>
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OSWEGO COUNTY COMMENTS REGARDING MICRON DEIS

Appendix C	REMI Report			<p>Report estimates 4200 construction workers needed daily, of which the local area already has estimated 2000. Meaning additional 2,200 area needed to in-migrate for the project</p>	<p>-Report states that approximately 2200 construction workers will need to migrate to the area to support the construction of Micron. This does not take into account the construction workers that are necessary to construct the various mitigation projects identified including the transportation projects, wetland mitigations, and also the additional housing that will need to be constructed (both temporary and permanent) to support the increased temporary and permanent population. Additional construction workers may come to the area simply to support these added construction projects. This does not take into account the additional construction workers which may be needed to construct off-shoot commercial and industrial growth resulting from Micron, though this may lag it will most certainly follow the construction of Micron or run concurrent. The population growth and resulting environmental impacts of this are not included in the EIS.</p> <p>-Additionally the report needs to take into account the length of construction and how this may impact the habits of the construction workers. Micron is estimated to take 20+ years to construct. These construction workers may choose to bring their families with them for that period of time (averaging 2.31 persons per household) which will impact the population for the entire duration of the project. Furthermore, due to the length of time, these workers may choose to stay in the area even following the construction of Micron. These potential population impacts have not adequately been considered as an environmental impact of Micron.</p>
Appendix C	REMI Report Page	155	Executive Summary	<p>Report estimates that 9000 new Micron jobs will be created directly at the site, but then assumes that 28% will in-migrate</p>	<p>This assumes that a lot of the workers will come from the existing workforce. However, the Report does not identify if the current workforce population has the ability to support this many jobs in the field of the proposed project. A study of the current workforce and ability to support these jobs should be conducted before making this assumption. The resulting population impacts and environmental impacts should then be identified and discussed in this report. Furthermore, with the assumption that a significant number of the workforce will come from the existing workforce in Syracuse result in a need to fill jobs in other industries, and potentially could result in added workers moving to the area for these other jobs. These discrepancies are not acknowledged, discussed, and the environmental impacts of these increased populations are not discussed in the report.</p>

From: Paula Peters <squirrelgirl457@outlook.com>
Sent: Saturday, August 9, 2025 4:22 AM
To: chipsnepa@chips.gov
Subject: [EXTERNAL] micron report

I'm a resident of Jamesville, NY, and I would like to share my opinion on micron impact on the environment. I hope people's opinions matter. I worry about the effects it will have on wildlife, wetlands, water, quality of life and global warming. It seems to me there are many more negatives than good things to this project. Can our area really support more people living here without ruining more of the green space displacing more wild life that would have to happen so that land could be developed to put in more homes to house people who would in turn maybe who would have children who might need more housing in the area, and by the time you're done there would be no green space left which would lead to more global warming which I thought our governor was trying to fight with her initiatives. Also what if on some odd chance the technology changes or if Micron goes out of business, like companies do sometimes, we destroyed land, trees and habitat for nothing. I don't know if you can get that back. I hope this is read and peoples opinions are given some consideration.

From: Jill Robinson <jillr1017@gmail.com>
Sent: Friday, August 8, 2025 4:21 PM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Draft DEIS Comments

In 1983, we moved to Grange Road in Clay because of the rural nature. Our water source is a drilled well. We hope that Micron will prove to be a good neighbor.

Following are our concerns for this project:

Extend the public comment period to 120 days

PROVIDE DETAILED PLANS TO PROTECT THE WATER SOURCES FOR THOSE OF US ON WELLS

Guarantee of continuation of present water quality

Transparency and specificity in project details:

- Chemicals used
- Specific Sources of fill
- Managing Traffic issues
- Specific plans for solid waste disposal
- Specific plans for disposal of used chemicals
- Specific plans for wetlands water displacement
- Specific plans for plans for retention ponds
- Specific plans for Construction dust control
- County's plans for when chips become obsolete

Create a local oversight committee comprised of community members with knowledge of pertinent issues

Micron needs to do much better wetland mitigation or work around existing wetlands as they are presently configured

Provide for public hearings with questions and answers after completion of each FAB

Micron should be financial responsible for adverse effects

Will Micron reimburse Onondaga County for expenses incurred (procurement, etc.) if none or only two FABs are built

When is Ryan McMahon moving onto Caughdenoy Road to enjoy the construction experience with us?

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. We are asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, we still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

We urge consideration and response to the following issues and concerns:

- **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
- **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
- **Greenhouse Gases:** The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar –and without relying on renewable energy credits or using renewable energy that is

already on the grid – to meet New York State’s climate change objectives and the requirements of the New York Green CHIPS Act.

Affordable and abundant water and energy: The DEIS does not ensure Micron’s massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

- Job Access, Housing & Transportation. The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

Thank you for your consideration of our comments.

Sincerely,

Jill and Richard Robinson
4690 Grange Road
Clay, NY 13041
315-652-5613

Onondaga County Sheriff's Office
Justice Center Incarcerated Individual Corresponden
555 South State Street
Syracuse, New York 13202-2104

FIRST-CLASS MAIL
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Onondaga County Industrial Development Agency
ATTN: Micron Project
335 Montgomery street, 2ND Floor
Syracuse, New York 13202



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25000516

Onondaga County Justice Center

August 8th 2025

Incarcerated Individual Letter Head

Good morning, Good Afternoon, or Good ~~Afternoon~~^{Evening} to whom it may

concern and or Executive McMahon or Micron, it self.

I Am, Kyle Nicholay Rouleau

It has come to my attention that not just four micro-chip factories, waste water plants, Pumping facilities, transportation in-frastructure, and Pipelines your planning on building and dig-ing up there land for your own intrest.

Not like the American / Canada pipeline thats in the intrest of the people to give cleaner and cheaper energy cost to both countries. Your news Paper Artist's rendering of what you are doing is a facade. Your building more than four Buildings. To have 45-48 days more or les, time to review the information is not long enough. To organize a coherent argument with our city representatives, our fellow city-man, and town people, Also to alert our local reservations is difficult to do.

I have spoken with fire fighters who are appalled and have very little patience for your "forever" chemicals" Dont lie and tell me they are not. They tell me they contribute to the fires. It gets into the soil...

I have taken upon myself to talk and tell the teachers and parents of the community about the implication that this will have on their children's health and Environment. They worry about the chemicals this major operation will cause on the land and Air, we all breathe because it cause's toxic cancer-causing chemicals where their kids play. You already said you'll have to re-create and make a new endanger'd species list. Does that sit right with you? What's next? windmills that Kill the birds! I hike and my child plays in this land your attempting to pollut There are a ton of un-used, abandoned factories, cant you re-purpose one of those? — Do you not understand that your building a town with-in a town? That to do this, your redirecting water from the wet lands, your putting wild life, little creatures on an endanger'd list! Does that sit well for you? The chemical you will Dis-purse, the Pollution you will cause will last longer than your, ~~100~~ year, operation time. The population can not handle this type of funding. It's better of going to bus drivers and to have longer routes to pick up Kids for School.

3

Onondaga County Justice Center
Incarcerated Individual Letter Head

Pollution travels hundreds, if not thousands of miles, infects like a locus and kills all that it touches. Have you not heard of the "train explosion" in Palestine, OH IO? The toxic fumes traveled to the Mississippi river, infected the water supplies for the country, killing the fish & poisoning the citizens.

Contributing to birth defects and creating 3 eye'd fish, believe it or not.

The sound of vibration of your construction and pollution travels and disturbs the community, let alone...

it'll destroy parts of other sovereign nations. I have checked and spoken to members and the chief of the Onondaga Reservation; the chief said he is not pleased to hear this. It has a direct conflict with his sovereign land. Where will the wet lands be relocated too and the migration of wildlife go? let alone the forever chemicals. It will invade his reservation, his wildlife, his waters, that he the chief has taken an oath to protect. His land is set apart from the United States.

4) Just cause you do not have Manners For Gods Country. Does not give you the right to pollute his portion, by air or by water, since our waters run as one, Think before you act. Is what the chief of the Onondaga nation wanted me to tell you. There has been no attempt to arrange notice to that nations people or chiefs. A newspaper BLURP Does not cut it.

NOT ON A ISSUE THIS BIG.

THANK YOU FOR HEARINN ME OUT.

HAVE A GOOD DAY



From: Maryellen Sheehan <farmermaryellen@gmail.com>
Sent: Friday, August 8, 2025 8:11 AM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Micron Public Comment

I am submitting this as a public comment around the Micron environmental impact statement as a farmer and land manager concerned about water.

I am not opposed to the micron facility in general, but feel that the environmental impact statement shows areas of concern that the company (who is slated to earn a lot of money from this project) should be made to address.

In particular, I am concerned about how the waste water handling, especially for any batches of water that have PFAS or other proprietary chemical mixes will be handled. We know these chemicals are toxic, and other states are now dealing with the repercussions of having allowed PFAS to be in their water system. I personally know farmers who have lost their farms in Maine due to PFAS contamination.

Letting a massive company come in, use a ton of our shared New York State resources, and potentially pollute our water and land with known hazardous chemicals, is a shortsighted way to bring in some jobs and money to the state. Even if you don't care about farmers or poor people drinking water through the Andy water system, the potential future litigation risk to New York State for allowing something like this to go through as it stands, seems astronomical.

If Micron wants to come in and make a lot of money making chips in New York, they should be liable for removing 100% of the chemicals and heavy metals they're putting in any water before they release it. Anything short of this feels like negligence on the part of Micron and New York State.

Maryellen Sheehan
5258 Irish Ridge Rd.
Chittenango, New York

Archived: Thursday, August 14, 2025 10:01:36 AM
From: [Lenny Siegel](#)
Sent: Friday, August 8, 2025 2:40:04 PM
To: [chipsnepa](#)
Subject: [EXTERNAL] CPEO Comments on the Micron DEIS
Importance: Normal
Sensitivity: None
Attachments:
[CPEOCommentsonMicron DEIS.pdf](#) 

Please find attached the Center for Public Environmental Oversight's comments on the **Micron New York 2025 Draft Environmental Impact Statement**.

Please acknowledge receipt. Thank you.

Lenny Siegel

—

Lenny Siegel
Executive Director
Center for Public Environmental Oversight
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CENTER FOR PUBLIC ENVIRONMENTAL OVERSIGHT

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TO: Onondaga County Industrial Development Agency and CHIPS Program Office

By e-mail at: chipsNEPA@chips.gov

SUBJECT: “Kicking the Can Down the Road”: Comments on the Micron New York 2025 Draft Environmental Impact Statement

FROM: Lenny Siegel, Executive Director, Center for Public Environmental Oversight

By e-mail at: Lsiegel@cpeo.org

DATE: August 8, 2025

Thank you for the opportunity to comment on the June, 2025 Draft Environmental Impact Statement for the Micron Semiconductor Manufacturing Project in Clay, New York.¹ We have shared earlier versions of this document with several other organizations, so you may find redundant or similar language in their submissions.

Micron, like other semiconductor producers, has always utilized and released into the environment a wide range of hazardous substances. In fact, the industry introduces hazardous substances into wafer fabrication faster than researchers can determine their toxicity and government agencies can regulate them. The Clay environmental review provides an opportunity to address potential semiconductor pollution in advance.

Unfortunately, the draft Environmental Impact Statement (DEIS) is vague, providing the public and relevant agencies insufficient information to determine if best practices will be used to prevent human and environmental exposure to chemicals from the Micron factory. The technical term for this is “kicking the can down the road.”

¹ *Micron Semiconductor Manufacturing Project, Clay, NY Draft Environmental Impact Statement, (DEIS)*, CHIPS Program Office and Onondaga County Industrial Development Agency, June, 2025, EISX-006-55-CPO-001. <https://ongoved.com/wp-content/uploads/2025/06/Micron-Draft-EIS.pdf>

One does not expect chipmakers to stop using hazardous substances that are intrinsic to their production. However, since the costs—health, environmental, and financial—of releases of these substances are borne by others, they have an obligation to reduce the use of such substances and prevent their release into surface water, groundwater, and the atmosphere, as well as comply with state and federal regulations and statutes.

Furthermore, the sixteen-year-plus timeframe in the Micron EIS does not appear to provide a mandatory mechanism for updating the review. The semiconductor industry is constantly upgrading its products and modifying its processes, so approval of the EIS should include a requirement for periodic updates to ensure that the additional impacts do not become significant.

Finally, the semiconductor industry, through organizations such as the Semiconductor Research Consortium, is sponsoring research with the objectives of understanding and addressing the potential environmental impacts of the use and release of PFAS “Forever Chemicals.” I believe that this is because the companies expect PFAS to be both monitored and regulated. Therefore, careful review and documentation, in the EIS, of the current state of PFAS impacts of semiconductor production is key to promoting better management practices as well as beneficial substitution of other substances.

Forever Chemicals

The DEIS language on per- and polyfluoroalkyl substances (PFAS) “forever chemicals” is sketchy and general, providing little information about the PFAS to be used and/or discharged from the facility. Even the CHIPS program June, 2024 *Final Programmatic Environmental Assessment for the Modernization and Expansion of Existing Semiconductor Fabrication Facilities* contains more detail about the use of PFAS in wafer fabrication. It reported, “Semiconductor manufacturers use PFAS as an essential material in multiple steps in the fabrication process.”² However, the entire semiconductor industry, including Micron, has stopped using PFOA and PFOS, the only two PFAS with federal drinking water standards.

The bottom line is that Micron will be using and potentially discharging a wide range of PFAS, only a few of which are identified, and none of which are currently regulated. Much more information is required to assure the public, as well as officials, that Micron will not significantly impact the environment by adding PFAS to the already PFAS-contaminated environment. Furthermore, Micron should adopt more protective PFAS management than what is promised in the draft EIS.

The DEIS says Micron will request “detailed chemical constituent documentation from its chemical vendors, including PFAS content, which often requires the use of non-disclosure

² *Final Programmatic Environmental Assessment [PEA] for Modernization and Internal Expansion of Existing Semiconductor Fabrication Facilities under the CHIPS Incentives Program*, (Final PEA), Chips Program Office, June 28, 2024, p. C-13.

<https://www.nist.gov/system/files/documents/2024/06/28/Final%20PEA%20for%20Modernization%20and%20Expansion%20of%20Semiconductor%20Fabs%206-28-2024%20-%20OGC-508C.pdf>

agreements to obtain such information.”³ Non-disclosure is unacceptable. The public has a right to know the identity of hazardous substances used and released in their communities. Most assuredly, Micron’s competitors rely on the same chemical suppliers, so it’s difficult to justify anything but full disclosure of the constituents of the industry’s process and product chemicals.

Fortunately, wastewater analysis provides valuable information about the PFAS found in semiconductor fabs. For example, a Cornell University analysis of chipmaking wastewater found, “Nontarget analysis revealed the presence of 41 homologous series of PFASs comprising 133 homologues.”⁴ The same study found that concentrations of non-targeted PFAS—that is, chemicals not detected using official analytic methods—significantly exceed the concentrations of known, “targeted” compounds in chip plant effluent. Furthermore, wastewater may include transformation products not found in chemical inputs.⁵ It is important to recognize that “forever chemicals” may transform into other “forever chemicals.”

The wide range of PFAS in Micron’s wastewater will end up in one or more of four places: the Oneida River; biosolids shipped from the Oak Orchard plants for landfilling or land application; filtering media, or air emissions from treatment. All such pathways should be monitored and eliminated.

The DEIS promises, “The indirect discharge permit would be anticipated to include limits for PFOA and PFOS derived from the existing Oak Orchard WWTP’s SPDES permit limits.”⁶ That’s not enough. Analytic methods and treatment strategies based upon those relatively well understood compounds are inadequate for addressing wafer fabrication wastewater. The PFAS to be used by Micron are not currently regulated at the Oak Orchard plants, and treatment methods that remove long-chain PFAS such as PFOA and PFOS do not necessarily remove the hundred or more PFAS found in typical fab wastewater.

Furthermore, while the *persistence* of all forever chemicals is a given because of the strong carbon-fluorine bond, the *toxicity* of most of them varies, and for many, it is largely unknown. The state of Hawaii prepared the following chart, showing the relative non-cancer risk of several PFAS compounds. In general, it shows that short-chain PFAS—that is, where the molecules have fewer carbons than long-chain PFAS such as PFOA and PFOS—tend to be less toxic than PFOA and PFOS. However, they are still as toxic as other well-known contaminants of concern. And one PFAS found widely in the environment and chip plant wastewater, HPFO-DA (also known as Gen-X) ranks with the long-chain compounds even though it has fewer carbons

³ DEIS, p. 3-240. <https://ongovед.com/wp-content/uploads/2025/06/Micron-Draft-EIS.pdf>

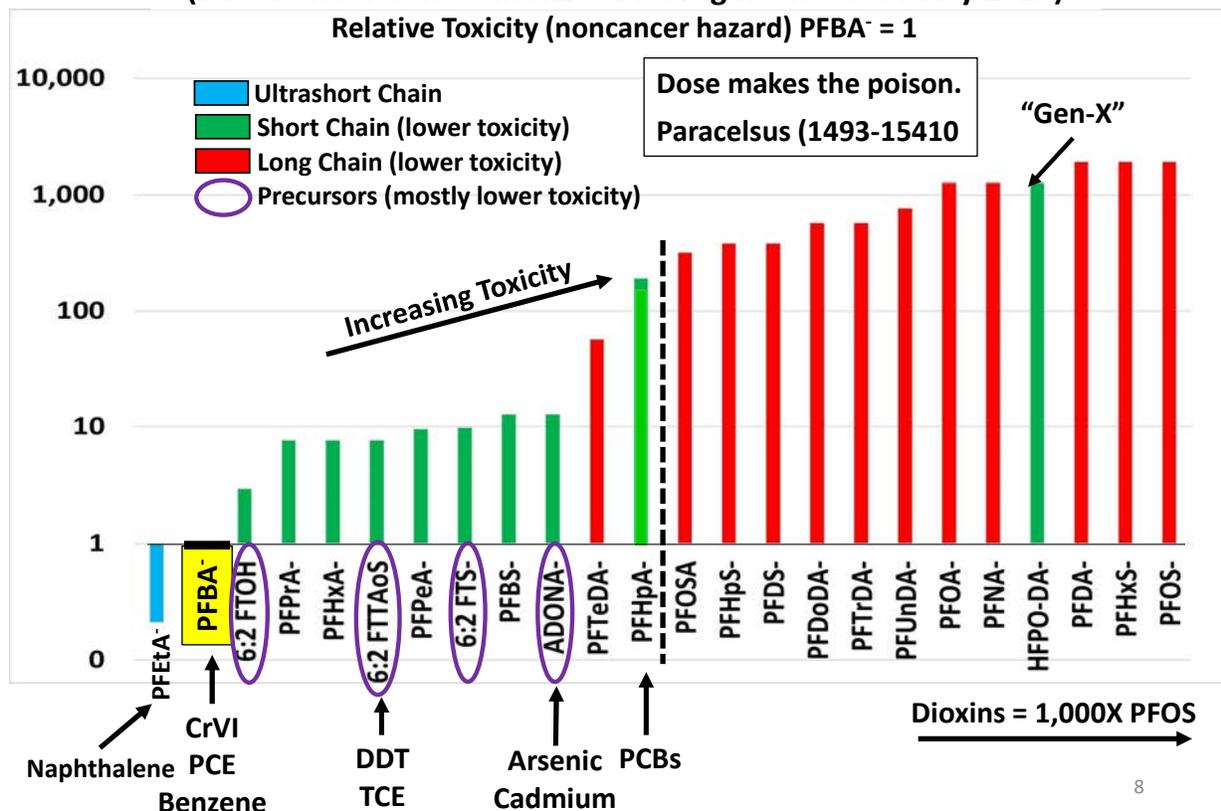
⁴ Paige Jacob, Kristas Barzen-Hanson, and Damian Helbling, “Target and Nontarget Analysis of Per- and Polyfluoralkyl Substances in Wastewater from Electronics Fabrication Facilities,” *Environmental Science & Technology*, February 16, 2021, p. 2346. <https://pubs.acs.org/doi/10.1021/acs.est.0c06690>

⁵ See Paige Jacob and Damian Helbling, “Exploring the Evolution of Organofluorine-Containing Compounds during Simulated Photolithography Experiments,” *Environmental Science & Technology*, August 17, 2023, <https://doi.org/10.1021/acs.est.3c03410>

⁶ DEIS, p. 3-241

per molecule. Thus, concludes Brewer, to adequately assess the risk of PFAS exposure, one must measure all PFAS in mixtures, not just the top two or even EPA’s target list.⁷

Relative PFAS Toxicity (noncancer Reference Dose) (based on references in HIDOH PFAS guidance February 2025)



Supporting Brewer’s findings, decades of research have shown that exposure to mixtures of different PFAS chemicals can result in cumulative adverse health effects. Even if the individual chemicals are at levels considered to be “safe,” a mixture may cause significant adverse health effects. EPA recognized this in developing the Hazard Index approach to Safe Drinking Water Act limits on four PFAS, which states, “The high likelihood for different PFAS to co-occur in drinking water; the additive health concerns when present in mixtures; the diversity and sheer number of PFAS; and their general presence and persistence in the environment and the human body are reflective of the environmental and public health challenges the American

⁷ Roger Brewer, “Testing and Risk Assessment of Complex Mixtures of PFASs in Wastewater and Sludges,” Healthy Water Solutions, May 2025. <https://www.youtube.com/watch?v=AqNNY3F358o>

public faces with PFAS, which poses a particular threat for overburdened communities that experience disproportionate environmental impacts.”⁸

The DEIS reports, “The IWWTP [Industrial Wastewater Treatment Plant] also would include technologies specifically designed to remove emerging contaminants, such as per- and polyfluoroalkyl substances (PFAS), including reverse osmosis and nanofiltration (membranes used to filter out PFAS, effectively removing them from the water), granular activated carbon (an effective method for removing PFAS through adsorption), ion exchange resins (which selectively capture and remove PFAS from wastewater)...”⁹ Including such a statement in the EIS does not guarantee the adequacy and reliability of the treatment technologies. Their effectiveness depends upon the other constituents of the waste stream, water volume, and PFAS concentrations. There is no single best method for removal, and none of the filtration methods actually destroys PFAS.

While other factors may influence the choice of technology, the starting point should be the measurement of all PFAS in source wastewater as well as removal system effluent. The DEIS promises, “To comply with its SPDES permit for the IWWTP, OCDWEP [Onondaga County Department of Water Environment Protection] would be required to perform regular analytical testing of surface water and effluent samples collected using NYSDEC-approved methods and would be subject to ongoing sampling, monitoring, and reporting requirements.”¹⁰ The same requirements would apply to Micron’s wastewater pretreatment system, governed by an indirect discharge permit negotiated with the OCDWEP.

To measure PFAS in wastewater, Qiao *et al* recommend using the TOP [Total Oxidizable Precursor] Assay method: “The TOP assay results emphasize the importance of implementing an integrated PFAS monitoring strategy that incorporates the TOP assay, along with routine monitoring of ultrashort-chain PFAS (e.g., TFA and PFPrA).”¹¹ Going further, Jacob *et al* concluded: “However, this [the elevated levels of combined target and non-target PFAS] does reinforce the idea that PFAS monitoring should incorporate complementary target and nontarget analyses or otherwise include measures of total organic fluorine to accurately assess PFAS abundance and potential environmental impacts. These data also support the recent push by policymakers to regulate total PFASs, rather than individual compounds, underscoring the importance of total PFAS concentration monitoring.”¹²

In short, Micron’s plan for monitoring discharges is vague and inadequate.

⁸ U.S. Environmental Protection Agency (EPA). “Per- and polyfluoroalkyl substances (PFAS): Perfluorooctanoic acid (PFOA) and Perfluorooctanesulfonic acid (PFOS) National Primary Drinking Water Regulation Rulemaking.” EPA-HQ-OW-2022-0114. June 25, 2024.

⁹ DEIS, 3-83

¹⁰ DEIS, 3-84

¹¹ Biting Qiao *et al*, “Nontarget Screening and Occurrence of Emerging Per- and Polyfluoroalkyl Substances in Municipal and Semiconductor Industrial Wastewater: A Large-Scale Survey in China,” *Environmental Science & Technology*, May 6, 2025, p. J. <https://doi.org/10.1021/acs.est.5c02035>

¹² Jacob, p. 2353

To understand how to address wastewater from the Micron Clay facility, the company and agencies need not wait for production to begin. Micron’s new fab in Boise, Idaho will be using the same or similar chemicals. The New York’s evaluation could begin with analysis of Boise effluent.

Recommendations

All PFAS discharge pathways from the Micron plant should be monitored and eliminated.

The Oak Orchard plants and Micron should commit to using, and the New York State Department of Conservation should require, sampling and analysis methods that capture all PFAS in wastewater from Micron, starting with samples from the Micron Boise plant.

In addition to the removal technologies cited above, the DEIS reports:

“Micron also would segregate process solvent waste containing PFAS from facility wastewater streams to closed bulk storage systems for off-site management by licensed and permitted treatment and disposal facilities.... Micron would dispose of or otherwise manage waste known to contain regulated PFAS in accordance with applicable regulations and as appropriate given its content and characteristics.”¹³ The DEIS names Veolia, all of whose disposal facilities are outside of New York State, as the primary waste disposal vendor.

Even if Micron is able to segregate a portion of its PFAS-laden wastewater, these provisions are inadequate:

First, there is no assurance that the permitted treatment and disposal facilities—likely incinerators located in communities of color—would destroy the particular mixtures transferred from the Micron plant without creating toxic transformation products. In fact, mixing chipmaking wastes with other hazardous wastes would increase the likelihood that new hazardous substances would be emitted. If such off-site “disposal” is allowed, Micron should be responsible for proving that PFAS and other hazardous substances from its waste streams, such as solvents, are destroyed. It should also be required to show that thermal treatment does not create hazardous products of incomplete combustion.

The DEIS promises, “Micron would continue to review the waste and reuse facilities to which it would send hazardous waste,”¹⁴ but there is insufficient detail to assure the public and regulators that PFAS, PFAS-containing media, and PFAS byproducts will be destroyed safely.

Second, the promise to comply with regulations is hollow. Of course, Micron should be expected to obey the law. However, we are unaware of any regulations governing the treatment and disposal of collected PFAS wastes, particularly when they are shipped out of state.

¹³ DEIS, p. 3-341

¹⁴ DEIS, p. 3-353

Similarly, removal technologies such as Granular Activated Charcoal, Anion Exchange Resins, and Foam Fractionation do not destroy PFAS. In general, the filtration media and gas emissions contain essentially the same PFAS that were contained in the original liquid. The filtration media are typically sent off site for landfilling or thermal treatment, neither of which is environmentally acceptable.

Fortunately, the federal government, through the Department of Defense, has been supporting the development of new technologies that actually destroy PFAS, breaking down the otherwise persistent molecules into non-toxic substances. The DEIS actually mentions one category of these technologies, Advanced Oxidation. These technologies may either treat the wastewater directly or destroy concentrated PFAS removed from wastewater through technologies such as foam fractionation. This is the most protective approach to treating wastewater that contains a wide range of PFAS compounds.

Recommendation

Micron should commit to, and NYS DEC should require that Micron evaluate available PFAS destruction technologies for use on site with the goal of implementing one or more as close to the points of use as feasible. NYS DEC should regulate these systems.

The DEIS points out that New York state has guidance values for PFOA and PFOS in “raw water.” However, there are no standards for the PFAS that Micron will actually be using. In fact, even in the best of cases there will not be standards or guidance values for the preponderance of PFAS used or released by Micron.

Yet current science demonstrates that all PFAS are toxic as well as persistent. Any release of PFAS into the environment adds to the already unacceptable load on the environment.

Recommendation

The goal of any program of removal, treatment, or destruction for PFAS should be ZERO releases, as much as practical. That is, technologies, not numerical standards—which do not exist—should be the basis of the approach to eliminating PFAS in chipmaking wastewater.

Fluoropolymers

Fluoropolymers are PFAS that should be regulated like other PFAS, not only at the Micron project but throughout their life cycle. Still, the EIS should document their massive use by the semiconductor industry. Mark Newman, CEO of Chemours, explained:

“You cannot make chips without a whole PFA infrastructure,” he said. “We estimate that in a modern-day fab, there’s a half-kilo of PFA in every square foot. So in a 400,000- to

600,000-square-foot fab, that’s 200 to 300 metric tons of this stuff.” It’s not just valves, of course, but all types of pipes, tubes and pumps in semiconductor equipment.¹⁵

The article continues, “On its website, Chemours says flat-out that “without PFA, domestic semiconductor manufacturing would not be possible.”

Chemours is the only domestic producer of PFA. In fact, in 2024 it announced the expansion of its notorious Washington Works plant in West Virginia to meet increased demand from the semiconductor industry.¹⁶

Fluoropolymers are particularly hazardous where they are manufactured, and at the end of their useful life. Lohmann *et al* concluded:

The evidence reviewed in this analysis does not find a scientific rationale for concluding that fluoropolymers are of low concern for environmental and human health. Given fluoropolymers’ extreme persistence; emissions associated with their production, use, and disposal; and a high likelihood for human exposure to PFAS, their production and uses should be curtailed except in cases of essential uses.¹⁷

Furthermore, the semiconductor Industry has introduced and embedded a wide variety of PFAS into semiconductor packaging and packages with no consideration of the potential environmental and worker safety risks. Chipmakers have little idea how much of which PFAS are contained in their final products. In fact, they admit that the absence of regulation is responsible for their lack of knowledge of the use of these chemicals. Chips produced at the Micron plant may end up in such packages. Since those products end up distributed in electronic equipment throughout the country and the world, there is no accounting of the environmental impacts of their disposal when no longer used. The Semiconductor Industry PFAS Consortium speculated, “it is unknown if end of life controls are necessary during the reclamation of electronic products.”¹⁸ In fact, the safe disposal of electronic equipment in general is a significant unsolved environmental problem. In this case, however, there are emerging alternatives, such as *glass substrates*, that may reduce the need for reclamation.

¹⁵ Amy Feldman, “More Domestic Chip-Making Means More ‘Forever Chemicals,’” *Forbes*, October 5, 2023. <https://www.forbes.com/sites/amyfeldman/2023/10/05/more-domestic-chip-making-means-more-forever-chemicals/>

¹⁶ Sara Samora, “Chemours expands Teflon PFA production in West Virginia,” *Manufacturing Dive*, August 22, 2024. <https://www.manufacturingdive.com/news/chemours-plans-teflon-pfa-forever-chemicals-plant-expansion-west-virginia/724609/>

¹⁷ Rainer Lohmann *et al*, “Are Fluoropolymers Really of Low Concern for Human and Environmental Health and Separate from Other PFAS?” *Environmental Science & Technology*, October 12, 2020. <https://dx.doi.org/10.1021/acs.est.0c03244>

¹⁸ “PFAS-Containing Materials Used in Semiconductor Manufacturing Assembly Test Packaging and Substrate Processes,” Semiconductor PFAS Consortium Assembly, Test, Packaging and Substrates Working Group, June 2, 2023. <https://www.semiconductors.org/pfas-containing-materials-used-in-semiconductor-manufacturing-assembly-test-packaging-and-substrate-processes/>

Recommendations

The final EIS should contain an estimate of the quantities of fluoropolymers in each Micron fab, by category of use.

The final EIS should contain a life-cycle analysis of the environmental impacts of fluoropolymers, including:

- 1. Analysis of the environmental releases and occupational exposures at fluoropolymer production plants. Since Chemours uses the “essentiality” of its products to the semiconductor industry to justify continuing, indeed expanded production of PFA, chipmakers should be held accountable for those environmental impacts.*
- 2. Analysis of any Micron on-site releases caused by the use or machining of fluoropolymers.*
- 3. Information about the likely end-of-life impacts from the fluoropolymer-containing equipment used at the Micron plant.*
- 4. Information about the use and release of fluoropolymers in packaging the chips produced from wafers fabricated at Micron, as well as their end-of-life environmental impacts. There are emerging substitutes, such as glass substrates, that should be used where feasible.*

Occupational Exposure to PFAS

Micron “promises to apply the most protective occupational exposure limit (OEL), based on published industry standards, for each individual chemical or hazardous substance that would be used in the facility manufacturing process...”¹⁹ This is by no means reassuring. **Are there published OELs for the full spectrum of PFAS? Mixtures of PFAS?** How do existing limits compare to *environmental* standards for the same substances? Historically, OELs are less protective than environmental standards, in part because of dated science, in part because it was assumed that workers would have adequate health and safety training and personal protective equipment, where called for.

Since much of the Micron wafer handling will be automated, machine operators might suffer less exposure to hazardous substances than in older, less automated plants. Rather, maintenance and supply personnel, including contractors, will be on the frontlines of exposure. The DEIS should identify these at-risk workers, who may include people who do not routinely work in hazardous areas. Unless they are adequately trained and provided with protective equipment, the more protective chemical-specific environmental standards should be applied.

¹⁹ DEIS, p. 3-258

Recommendation

The DEIS should identify any occupational exposure limits currently (or soon to be) published for PFAS used in the semiconductor agency.

Greenhouse Gases

The DEIS concluded, “The GHG [greenhouse gas] emissions that would result from construction and operation of the Proposed Project are expected to be **unavoidably significant**. Even with significant avoidance and minimization efforts as well as mitigation, GHG emissions associated with operation of the Micron fabs and related facilities will represent a significant increase in overall GHG emissions in the Five County Area and New York State.” [emphasis added]²⁰

To their credit, the authors of the DEIS find that the GHG emissions will significantly contribute to climate change. But we are shocked that less has been done to make them avoidable, given the local and global efforts to combat climate change.

The most significant GHG emissions from semiconductor processing, as opposed to energy use by Micron, are fluorinated gases, which are extremely potent and persistent greenhouse gases. Some of these gases last tens of thousands of years in the atmosphere. The DEIS estimates that the project will release 881,699 metric tons CO_{2e} per year of such gases, even after thermal oxidation (incineration) on site.²¹ Furthermore, the stack emissions are treated by wet scrubbing to reduce acid releases. These scrubbers may send pollutants, including PFAS, into wastewater, where it must be removed and/or treated.

The DEIS, again to its credit, identifies another category of process greenhouse gas emissions, heat transfer fluids. The DEIS projects annual fugitive (HTF) emissions of 199,699 MT/y CO_{2e}.

The DEIS also reports that the semiconductor industry is researching ways to halt such releases, but it offers few details. For now, Micron expects to externalize the environmental costs of its greenhouse gas emissions.

Recommendation

The state of New York should incentivize the reduction of Micron’s GHG process gases by withholding incentives or penalizing the emissions. If officials accept the “unavoidable” impact, Micron will have a blank check to contribute significantly to climate change while others—residents, companies, and government agencies—struggle to make less significant reductions.

Extremely Hazardous Substances

The DEIS states, “Pending further review based on evolving Micron Campus designs, Micron would expect the RMP [Risk Management Plan] to cover eight regulated chemicals (ammonium

²⁰ DEIS, p. 5-2

²¹ DEIS, p. 3-205

hydroxide, anhydrous ammonia, hydrogen, hydrogen chloride, silane, chlorine, dichlorosilane, and HF [hydrogen fluoride] and would evaluate and add additional chemicals to the RMP on a case-by-case basis.” Earlier it mentions sodium hydroxide, and it promises, “hazardous chemicals and materials would be properly stored in containers and drums in storage areas with secondary containment to provide added protection in the event of a spill or release.”²² This is good, but it’s not enough. Leaks and spills may still occur during transport or use, so it’s important that employees, neighbors, and government agencies be fully aware of the presence of extremely hazardous substances.

Semiconductor fabs typically also use arsine and phosphine, which are extremely toxic gases, even lethal, and diborane, which is highly toxic and pyrophoric. Perhaps they aren’t mentioned because the EIS uses EPA’s reporting thresholds, which are generally an order of magnitude less protective than California’s.²³ Even in low volumes, a leak or spill of extremely toxic gases may necessitate the evacuation of buildings as well as warnings to nearby properties.

This information is important to be included in the environmental review, because local planners need to know how close sensitive uses should be located to the potential toxic release site. For example, in Mountain View, California, the city banned childcare centers in parts of town with semiconductor production.

The DEIS reports, “Clay Fire and Cicero Fire coordinate with the City of Syracuse Fire Department for responses to incidents involving potential hazardous materials, as the Syracuse Fire Department employs a specialty hazardous material response unit.”²⁴ More detail should be provided. Does the Syracuse Fire Department have the expertise and resources to handle the emergencies associated with semiconductor manufacturing? How close, by both time and distance, are personnel and equipment from the specialty unit to the Micron campus? The dangers of hazardous gas releases are so severe that “anticipating adequate capacity to respond to future incidents,” without full transparency is a hollow promise.

Recommendations

The final Micron EIS should include a complete list of extremely hazardous substances expected to be used on the property, regardless of anticipated quantity. The public has a right to know even if the federal thresholds for storage are not exceeded.

Micron or DEC should conduct dispersion modeling for the most hazardous of the gases, to guide decisions on the location of sensitive use. For example, would an arsine release from Micron put children at its nearby childcare center at risk?

²² DEIS, pp. 341-344

²³ Compare the tables at “CalARP Program Resources,” viewed July, 2025. <https://calepa.ca.gov/california-accidental-release-prevention/california-accidental-release-prevention-program-resources/>

²⁴ DEIS, p. 560

Other Hazardous Substances

Other than the extremely hazardous substances mentioned above, the DEIS does not specifically name hazardous chemicals. The Final PEA, on the other hand, contains a short list in Section 3.8 and a longer list in Appendix D.²⁵

The DEIS does not address the long-standing environmental threat caused by solvents used in production. Once again, the Final PEA provided more detail: “For example, traditional solvents used in fab cleaning processes contain N-Methylpyrrolidone (NMP), which is known to cause harm to reproductive systems.”²⁶ It noted that some companies—in this case a Taiwan-based producer was using alternatives.

Recommendation

The DEIS should provide complete list of hazardous substances used in production, their function, and possible exposure pathways. Once again, the public has a right to know which hazards are present and may be released from semiconductor production.

Cumulative Effects

The DEIS fails to assess the cumulative impacts of PFAS, industrial Greenhouse Gases, and Extremely Hazardous Substances in its Cumulative Effects analysis. The Micron project is expected to attract related activities, including research and development, chemical suppliers, and even competitors to the area. That is, other facilities may release hazardous substances to the environment, and in particular to Onondaga County’s wastewater system, in addition to the PFAS discharges from other, unrelated industries.

Therefore, the DEIS should analyze and mitigate the cumulative impacts associated with hazardous substance use, storage, and release. Without a comprehensive understanding of the types and amount of PFAS discharges on site and for anticipated sites across the region, cumulative impacts for surface water, groundwater, air emissions, and environmental justice cannot be understood.

Recommendation

The DEIS should include a comprehensive analysis of the cumulative impacts of Micron’s PFAS discharges to the environment, with a focus on the releases to the Oak Orchard wastewater plants and, in turn, to surface water and wastewater biosolids. As stated earlier, Micron should commit to zero discharge of all PFAS, and its industrial pre-treatment permit should make this an enforceable requirement. Because the cumulative impacts are regional in nature, the environmental justice assessment (Section 3.16) should consider these regional impacts.

²⁵ Final PEA

²⁶ Final PEA, p. 69.

Inequality

I was asked to analyze the Micron DEIS because of my expertise in addressing the hazardous substances used and released by the semiconductor industry, but in reviewing the document I noticed a significant shortcoming in the section on Socioeconomic Conditions. As background, I have been living and studying California’s Silicon Valley for nearly six decades. I have served as City Council member and Mayor of Mountain View, the birthplace of the commercial semiconductor industry.

Silicon Valley, as well as other areas with concentrations of high-tech employers, suffers from significant inequalities in income and wealth.²⁷ To a large degree, this is a result of the influx of well-paid managers and professionals, leaving lower-paid production and service workers to compete for housing. The upper tiers can afford to live near centers of employment, while the lower socioeconomic tiers not only must struggle to pay their bills, but they end up with longer, time-swallowing commutes and weaker public schools. We call this the “jobs-housing imbalance.”

Plans to build more housing and hire union construction workers are commendable, but they are likely to be inadequate in enabling equitable income and wealth distributions. Creating large numbers of jobs, without sufficient mitigation, can create more problems than it resolves.

Recommendations

The draft EIS should expand its section on Socioeconomic Conditions to consider the direct and indirect impacts of the Micron development on the distribution of income and wealth, as well as the resulting impact on lower-income workers and residents. This should include wage and salary projections for each class of worker, whether directly employed by Micron or its contractors and suppliers. Typical categories including managers, professionals, production workers, and service workers such as janitors, security guard, and cafeteria workers.

Micron should explore mechanisms for leveling pay levels, such as the recognition of labor unions for production and service workers.

In Summary

The draft Environmental Impact Statement for Micron New York contains valuable information, but in the case of hazardous substances it does not provide enough detail to satisfy the public’s right to know or to guide decisions designed to protect worker health, public health, and the environment. If the final EIS fails to disclose essential details, members of the public may find

²⁷ See Rachel Massaro and Daniel Wessler, “2025 Silicon Valley Index, Joint Venture Silicon Valley, March, 2025. <https://jointventure.org/publications/institute-publications/2706-2025-silicon-valley-index> and Anji Buckner-Capone et al, “2025 Silicon Valley Pain Index,” San Jose State University Human Rights Institute, July, 2025. <https://www.sjsu.edu/hri/docs/SVPI%202025%20Annual%20Report%20-%20Press%20Release%20.pdf>

the only way to influence the project is to oppose it outright as it moves through the permitting process—much which will take place after construction has started.

More than a decade ago, I served as a consultant to the Bronx Committee for Toxic Free Schools, which successfully sued the New York City School Construction Authority to require a detailed maintenance and monitoring plan to ensure that children at the Mott Haven Campus would not be exposed to toxic substances in the long-term and submit the plan for public review. The courts found, “In essence, the position of petitioners here, and the holding of the courts below, is that the methods chosen by the Authority for long-term maintenance and monitoring of its engineering controls were too important not to be described in an EIS.”²⁸ I recognize that the Micron project is subject to different regulatory authorities. Nevertheless, I believe the same principle applies: Where public health and safety is expected to be at risk due to unacceptable hazardous substance exposure from a project under SEQRA review, detailed plans for monitoring should be included in the EIS, not left for subsequent permitting processes.

Furthermore, the semiconductor industry for decades has been characterized by Moore’s Law, which projects significant periodic improvements in circuit density. For this and other reasons, over the course of the sixteen-year project Micron is expected to constantly update its production technology. This will include the introduction of new, un-assessed, process chemicals.

In addition, the DEIS notes the likelihood of advances in environmental analysis and treatment. Therefore, there should be a mechanism to revisit key elements of the EIS. That is, impact analysis and the protection of workers, neighbors, and the environment should keep up with the remarkable progress of semiconductor chips, their applications, and associated environmental technologies.

Recommendations

The Final EIS should contain detailed plans for monitoring the release of hazardous substances, including all forms of PFAS, from the Micron plant.

The Final EIS should contain “triggers” for updating portions of the EIS, based upon advances in production and environmental technologies as well as environmental and land use conditions at the Micron site.

²⁸ Matter of Bronx Comm. for Toxic Free Schools v New York City Sch. Constr. Auth. 2012 NY Slip Op 07051 Decided on October 23, 2012 Court of Appeals Smith, J. Published by New York State Law Reporting Bureau pursuant to Judiciary Law § 431. <https://law.justia.com/cases/new-york/court-of-appeals/2012/171.html>

Archived: Thursday, August 14, 2025 9:57:33 AM

From: [Kadijah Sutton](#)

Sent: Friday, August 8, 2025 11:28:36 AM

To: [chipsnepa](#)

Cc: [Jonathan Kalmuss-Katz](#) [Alana Reynolds](#)

Subject: [EXTERNAL] ATTN: Micron Project - Re: Submission of Supporting Documents and Attachments

Importance: Normal

Sensitivity: None

Good Morning,

We are currently preparing comments on the Micron Draft EIS. The comments will contain dozens of supporting documents and attachments that we will be submitting to the administrative record, some of which are too large to send via email. For the convenience of OCIDA staff, we are planning to send those attached documents via an FTP file transfer link (most likely DropBox). Please confirm that OCIDA is able to receive documents via FTP.

Thank you,

Kadijah Sutton

She/her/hers

Sr. Litigation Assistant

Toxic Exposure & Health

Earthjustice

48 Wall Street, 15th Floor

New York, NY 10005

ksutton@earthjustice.org



Because the earth needs a good lawyer

The land on which our office sits is the homeland of the [Lenape Peoples](#).

We recognize the Lenape as the traditional stewards of this stolen land and honor their continuing relationship with their territory.

From: Ryan Pleskach <rpleskach@townofclay.org>
Sent: Friday, August 8, 2025 2:58 PM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Town of Clay Town Board Comments on Micron DEIS
Attachments: ToC Micron DEIS Comments.pdf

Hello,

On behalf of the Town Board of the Town of Clay, please find attached our formal public comment letter on the Draft Environmental Impact Statement (DEIS) for the Micron project.

We respectfully request a written acknowledgment of your commitment to work with the Town of Clay to address these areas, including a timeline and responsible parties for each, so that accountability is clear from the outset.

Ryan Pleskach, Councilor
Town of Clay, NY
www.townofclay.org

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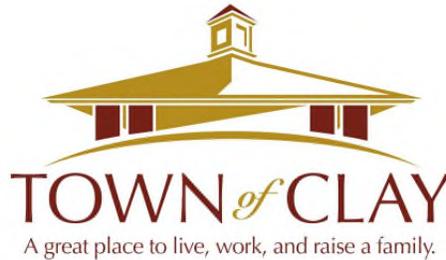
Office of the Supervisor

Supervisor

Damian M. Ulatowski

Deputy Supervisor

Joseph A. Bick



Councilors

David Capria
Deborah Magaro-Dolan
Ryan Pleskach
Edward Wisnowski
Eugene Young

Date: August 8, 2025

To:

- The Honorable Howard Lutnick, Secretary, U.S. Department of Commerce
- The Honorable Kathy Hochul, Governor of New York
- Mr. Sanjay Mehrotra, Chief Executive Officer, Micron Technology
- The Honorable J. Ryan McMahon II, County Executive, Onondaga County
- Mr. Robert Petrovich, Executive Director, Onondaga County Industrial Development Agency (OCIDA) & Deputy County Executive – Economic Development and Planning

Re: Town of Clay Comments and Expectations Regarding the Draft Environmental Impact Statement for the Micron Project

On behalf of the entire Town Board of the Town of Clay, we respectfully submit this letter as our formal public comment on the Draft Environmental Impact Statement (DEIS) for the Micron project. This letter is a unified statement of the Town's expectations, responsibilities, and guiding principles. It sets the framework as we prepare for the unprecedented growth and change that this project will bring.

Micron's decision to locate its landmark semiconductor manufacturing campus in the Town of Clay represents the most significant economic opportunity in our history. We are proud to serve as the host community and deeply appreciate the leadership demonstrated by Micron, New York State, Onondaga County, and the Onondaga County Industrial Development Agency (OCIDA) in bringing this investment to Central New York. The promise of this project is transformational, and the Town of Clay stands ready to be a full and responsible partner in ensuring its success.

At the same time, the DEIS makes clear that the project will have far-reaching impacts on the Town's infrastructure, municipal services, environment, traffic operations, public safety, and long-term planning responsibilities. Identified effects include significant increases in traffic volumes along major corridors and changes to roadway configurations. Other impacts include potential constraints on emergency service response times, expansion of hazardous materials handling and transport, relocation of utilities, and measurable changes in community noise exposure. The scale of construction activity, combined with the operational footprint of four large semiconductor fabs, will also create sustained demand for expanded municipal capacity in areas such as engineering, planning, code enforcement, stormwater management, snow removal, and public safety readiness.

While we have taken an important first step through the execution of a reimbursable expenses agreement with Micron, that agreement alone cannot address the timing or magnitude of the impacts identified. This project is unique among CHIPS Act investments. While others are dispersed across large metropolitan regions or involve expansions of existing facilities, Micron will construct four massive fabrication plants entirely within a single community, transforming the Town of Clay over a period of up to 16 years. This pace and concentration of change is unlike anything any other municipality in the nation has ever experienced. Many of these impacts fall directly on the Town and its residents, and we are committed to managing them responsibly and in good faith.

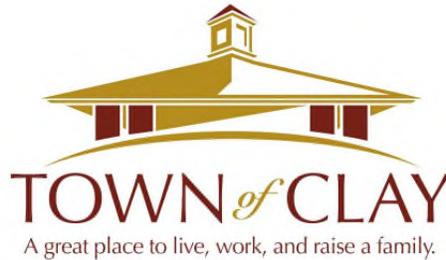
As a matter of public policy, the cost of accommodating this project shall not be placed on our current taxpayers or local businesses. We expect Micron, New York State, Onondaga County, and OCIDA to provide the Town of Clay with the resources, coordination, and authority necessary to proactively mitigate and manage the impacts described in the DEIS and expanded upon in the comments below.

Supervisor

Damian M. Ulatowski

Deputy Supervisor

Joseph A. Bick



Councilors

David Capria
Deborah Magaro-Dolan
Ryan Pleskach
Edward Wisnowski
Eugene Young

Comment #1: Unfunded Service Impacts Require Upfront Investment

The Micron project will create immediate and sustained demands on core Town services. These include expansion of the highway garage and equipment fleet, additional planning, engineering, and code enforcement staff, upgraded permitting and recordkeeping systems, enhanced maintenance of parks and community facilities, and major improvements to snow removal and stormwater infrastructure. These are not distant possibilities. They are obligations that will begin as soon as site preparation and related development activity increases.

Traffic, utility, and hazardous materials considerations will further compound these demands. Roadway and intersection reconfigurations, utility relocations, and the introduction of raised medians will require close coordination with emergency services to maintain acceptable response times. The DEIS does not currently evaluate potential delays to fire and EMS stations located on Route 31 and Caughdenoy Road, nor does it address operational impacts to surrounding communities. Maintaining access during construction will require municipal oversight and technical capacity beyond our current staffing levels. Mitigation measures must include signal coordination or adaptive signal timing and emergency preemption at traffic signals.

In addition, the receipt, handling, and storage of large volumes of hazardous chemicals and petroleum products will necessitate specialized planning, training, and equipment at the local level. Federal- and state-mandated Spill Prevention, Containment, and Countermeasure (SPCC) Plans, Spill Prevention Reports (SPR), and Risk Management Plans (RMP) will govern Micron's on-site operations, but spills or releases during transport to and from the facility may occur on local roadways and in nearby neighborhoods. Effective response to such incidents will require our volunteer fire departments and other first responders to receive specialized training in the specific hazards posed by these materials. They must also be equipped with the necessary protective gear, containment tools, and monitoring equipment.

The Town of Clay is not seeking permanent subsidies. Over time, a growing tax base will restore fiscal self-sufficiency. However, to responsibly meet the early demands of this project, the Town requires a significant upfront investment to expand capacity in parallel with Micron's development. This funding must be committed prior to key construction milestones, with clear sources, disbursement schedules, and scope aligned to the actual service demand and facility impacts identified above. It must come through grants and direct appropriations from Micron, New York State, Onondaga County, or OCIDA.

The Town will not shift the financial burden of Micron-related impacts onto existing taxpayers or businesses, borrow or issue long-term debt for capital improvements or operations associated with this project, or divert resources from existing services to subsidize new development. The scale, speed, and complexity of this undertaking require early, sustained, and externally funded investment in municipal capacity to ensure that public health, safety, and quality of life are protected from the outset.

Comment #2: Regulatory Barriers Are Limiting Housing Capacity

The Town of Clay is facing a significant and growing challenge in meeting future housing demand due to recent changes in wetland setback regulations. Since the New York State Department of Environmental Conservation (NYSDEC) assumed jurisdiction from the U.S. Army Corps of Engineers, regulated wetland setbacks have expanded, sharply reducing the buildable area on key parcels throughout the Town. This constraint affects multiple sites already identified for residential growth and located near planned transportation improvements, making it more difficult to align housing development with infrastructure investments.

Supervisor

Damian M. Ulatowski

Deputy Supervisor

Joseph A. Bick



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This loss of developable land comes at a time of substantial workforce housing demand from the Micron project. The DEIS acknowledges the need for new housing but does not account for the combined effect of wetland setback restrictions, infrastructure capacity, and transportation network changes on where and how housing can be built. For example, concept roadway improvements on Route 31 introduce raised medians and cul-de-sacs that alter local access patterns, potentially impacting the viability of nearby residential development sites. Without careful coordination, new roadway configurations combined with reduced buildable acreage could further limit the number of suitable parcels for housing.

The Town of Clay supports responsible environmental stewardship and has demonstrated this commitment by earning recognition as a 2-Star Clean Energy Community under New York State's Clean Energy Communities program, with over 3,400 points from high-impact sustainability actions. However, the current regulatory framework is unintentionally working against the State's goals for housing supply and affordability. Local homebuilders have indicated that the expanded setbacks are preventing viable projects from moving forward, even in areas already served by utilities and transportation. If unaddressed, this will push workforce housing demand into adjacent communities, placing additional pressure on the regional housing market and increasing commuter traffic.

Public engagement during the Town's recent Land Use Study made clear that residents want future residential growth to reflect Clay's character as a suburban, family-friendly community. Survey results showed strong support for single-family homes at a range of densities, and far less support for high-density apartment complexes or urban-style infill. This preference is not solely a matter of aesthetics. It is tied to the Town's infrastructure capacity, preservation of neighborhood character, and long-term sustainability. Any solution to the current housing constraint must allow the Town to deliver housing types consistent with these priorities while ensuring that transportation, emergency services, and environmental protections are fully integrated into the planning process.

We therefore request targeted regulatory relief that balances environmental protection with the flexibility required to meet both local and state housing objectives. This relief should be paired with coordinated transportation and infrastructure planning to ensure that available parcels are accessible, serviceable, and compatible with community character. Without such action, the Town will be unable to provide sufficient housing to support Micron's workforce needs while maintaining the quality of life expected by our residents.

Comment #3: Townwide Noise Impacts Require Equitable and Lasting Mitigation

The DEIS identifies more than 520 individual receptors within the Town of Clay that are expected to experience significant increases in noise levels, primarily from traffic along major corridors such as Route 31, Caughdenoy Road, Route 11, and Interstate 481. However, this number underrepresents the full extent of the impact. The cumulative effect of employee commuting, freight movement, construction activity, and regional development linked to the Micron campus will raise baseline noise levels across much of the Town. This includes neighborhoods that have historically been insulated from high-intensity traffic or industrial operations.

Traffic pattern changes outlined in the DEIS will amplify this effect. New interchanges, access road reconfigurations, and raised medians will redirect traffic flows in ways that may concentrate noise along certain corridors and at key residential interfaces. The Verplank interchange, for example, is likely to draw additional east-west traffic through Clay, while cul-de-sac conversions and modified on/off-ramp designs may push more vehicles onto alternate local routes. These shifts have not been fully modeled to show their long-term noise implications.

Supervisor

Damian M. Ulatowski

Deputy Supervisor

Joseph A. Bick



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Noise mitigation must therefore go beyond the limited commitments currently described. Permanent sound barriers should be installed in all feasible locations, including residential areas near Barcaldine Drive, Route 31, Route 11, Caughdenoy Road, and the neighborhoods surrounding the I-481/Route 31 interchange. Where right-of-way or design constraints prevent barrier installation, alternative methods such as vegetated berms, low-noise pavement surfaces, or building façade improvements should be deployed.

Mitigation must also address construction-phase noise, which will occur over many years and could involve pile-driving, heavy vehicle traffic, and large-scale material handling. Best practices should include use of properly muffled and acoustically insulated equipment, restrictions on nighttime activities, and selection of lower-impact construction methods where feasible.

To protect public health and maintain accountability, the Town expects continuous noise monitoring at representative receptor locations during both construction and operation, with results made publicly available. This should be paired with adaptive mitigation measures—if monitored noise exceeds modeled levels, additional controls must be deployed. The monitoring network should also be integrated with the Town’s broader communication strategy, enabling residents to access up-to-date information on noise conditions in their neighborhoods.

The Micron project’s duration and scale make noise impact a permanent quality-of-life issue for the Town. Addressing it equitably from the start will require full funding for both physical infrastructure and ongoing operational controls, not temporary or piecemeal measures.

Comment #4: Best Management Practices Must Be Enforced and Fully Funded

The DEIS outlines a comprehensive set of Best Management Practices (BMPs) intended to protect public health, safety, and the environment during the construction and operation of the Micron campus. While these measures are essential, several critical gaps and clarifications are needed to ensure they are effective, enforceable, and fully funded.

Hazardous Materials and Spill Response

The facility will handle significant quantities of hazardous chemicals and petroleum products during operations, delivered by truck and rail. Compliance with federal and state requirements will require development and maintenance of a Spill Prevention, Containment, and Countermeasure (SPCC) Plan, a Spill Prevention Report (SPR), and a Risk Management Plan (RMP) under Section 112(r) of the Clean Air Act. Each plan must detail storage vessel specifications, operational safeguards, worst-case release scenarios, employee training, and emergency response protocols.

Each plan must include provisions for adequate on-site containment materials, such as manhole covers, absorbents, and temporary dikes, and must be reviewed by NYSDEC and USEPA. The Town also expects confirmation that Micron will maintain on-call contracts with trained private spill-response contractors capable of mobilizing quickly for on-site or off-site incidents. Given the complexity of materials involved, local fire departments will require additional specialized training and equipment to respond effectively to chemical emergencies.

Stormwater, Wastewater, and Water Quality

Stormwater and wastewater management systems must be designed, constructed, and operated to ensure that all discharges meet or exceed applicable federal and state water quality standards. This includes full

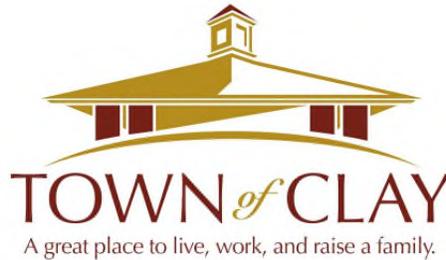
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implementation of proven best practices such as swales, check dams, detention facilities, and complete compliance with the State Pollutant Discharge Elimination System (SPDES).

The Oak Orchard Wastewater Treatment Plant (OWWTP) will require phased upgrades to handle wastewater from Micron's operations, with Phase 1 improvements in place before initial operations and a new treatment train completed prior to Phase 2. Air permitting modifications must also be completed as necessary. These upgrades must be fully funded by Micron and its partners to prevent any financial or service impacts on existing customers and to safeguard downstream water quality.

The same standard of protection must apply to winter maintenance of all roadways serving the Micron campus and surrounding neighborhoods. Many of these roads are maintained by New York State or Onondaga County, and both agencies need to work directly with the Town to develop and implement a coordinated, science-based strategy for snow and ice control that reduces environmental impacts. Consistent with the recommendations of the 2024 Adirondack Road Salt Reduction Task Force Report, this strategy must include brine and pre-wetting technologies, calibrated spreaders, alternative deicers, and comprehensive operator training to minimize salt use. These measures, already in use in sensitive areas such as Lake George, Wilmington, and Keene, have been proven to protect drinking water sources, prevent chloride contamination, and preserve aquatic ecosystems. This salt reduction strategy should be incorporated into and measured against the DEIS-proposed water quality monitoring program to ensure that its effectiveness is documented, and corrective actions are taken when necessary.

Traffic, Transportation Demand Management, and Multimodal Access

Transportation BMPs must go beyond current DEIS commitments. Traffic signal coordination, particularly along Route 31 from Oswego Road to I-481, is needed to improve peak-hour flow and reduce congestion. Adaptive signal control should be deployed both during construction and permanently. Preemption systems should be installed to prioritize emergency and transit vehicles. Transportation demand management (TDM) measures, such as employee shuttle programs, carpool incentives, and parking management, must be implemented early to reduce single-occupancy vehicle trips. Side street pedestrian and bicycle connections, bus pull-off bays, and improved lighting at intersections should be added to ensure safe and efficient multimodal travel.

Construction Practices and Local Access

Construction staging and sequencing must be planned to minimize disruptions to local businesses, residents, and emergency service access. Raised medians, cul-de-sac conversions, and ramp reconfigurations, such as those proposed for Route 31, Caughdenoy Road, and the I-81/Route 31 interchange, must be evaluated for their impact on fire department response times and neighborhood connectivity before implementation. Where negative impacts are identified, alternative designs or mitigation measures must be adopted.

Enforcement and Local Oversight

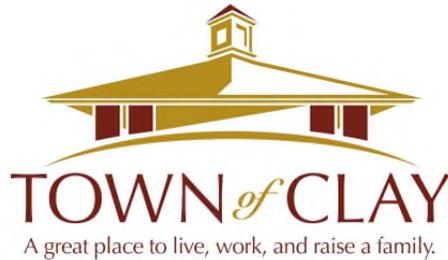
The Town of Clay will use all available planning, zoning, and permitting authority to ensure compliance with BMPs throughout the life of the project. When uncertainty arises, the Town will prioritize public health and safety over cost or schedule considerations. To meet these responsibilities, Micron, Onondaga County, New York State, and OCIDA must provide funding and technical support to train, equip, and maintain the readiness of the Town's volunteer fire departments, police, and code enforcement staff.

Supervisor

Damian M. Ulatowski

Deputy Supervisor

Joseph A. Bick



Councilors

David Capria
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BMPs for the Micron project must be treated not as optional guidelines but as binding commitments, backed by enforceable agreements and sufficient funding. Without full implementation and oversight, the scale of the project poses unacceptable risks to community health, safety, and quality of life.

Comment #5: Community Engagement and Public Accountability Must Be Built In

The Micron project will have generational impacts on the Town of Clay, and its success will depend not only on technical execution but also on long-term transparency, responsiveness, and collaboration with the community. The scale and duration of this development requires a permanent structure for public engagement that is proactive, measurable, and accessible to all residents.

Micron must establish and maintain a formal community outreach and engagement program to serve as a direct and permanent channel between the company, its public partners, and the people of Clay. This program should include:

- Regular project updates on construction progress, operational changes, and anticipated impacts.
- Public reporting on compliance with key mitigation measures in areas such as transportation operations, environmental safeguards, hazardous materials management, and emergency response capacity.
- Clear and accessible channels for residents to raise concerns, receive timely responses, and track resolution of issues.

The outreach program must be staffed and funded for the life of the project and beyond. Public reporting should include measurable performance indicators. These may include traffic flow data, noise monitoring results, air and water quality compliance reports, and emergency response readiness metrics. These metrics will allow residents to independently verify that commitments are being met.

This level of transparency is not unprecedented. Other communities hosting large semiconductor manufacturing facilities, such as New Albany, Ohio, have implemented dedicated public engagement programs to keep residents informed and involved. Clay expects the same standard of practice with the added requirement that the Town play an active role in oversight and communication.

Trust will be built through visible action and open sharing of information. By formalizing and funding a permanent community engagement framework before major construction begins, Micron and its partners can ensure that public accountability is not an afterthought but a core component of the project's long-term success.

Conclusion

The Town of Clay is proud to serve as the home of Micron's historic investment. We believe in the mission behind this project and the future it represents for our region, our workforce, and our economy. We are committed to being a proactive and responsible partner in its success.

At the same time, we have a clear responsibility to protect the interests of our community. The scale, speed, and intensity of the changes ahead are unlike anything a single town has faced in the history of modern economic development. The comments outlined in this letter reflect the practical needs and core values of our residents, who have welcomed this opportunity with open minds and high expectations.

We respectfully request written acknowledgment of your commitment to working with the Town of Clay to address the five key areas identified in this letter: service impact mitigation, housing flexibility, noise relief,

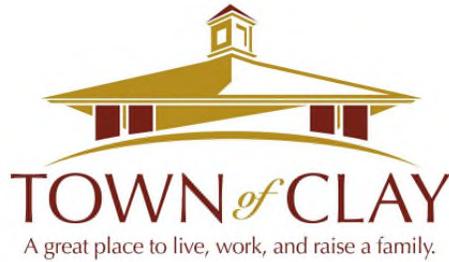
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enforcement of best practices, and long-term public engagement. This acknowledgment should include a timeline and responsible parties for each area so that accountability is clear from the outset. With these expectations in place, we believe this project can become a national model for public-private collaboration and shared success.

We look forward to working together to make this vision a reality.

Sincerely,

Damian Ulatowski, Supervisor

Joseph Bick, Deputy Supervisor

Eugene Young, Councilor

Ryan Pleskach, Councilor

Deborah Magaro-Dolan, Councilor

David Capria, Councilor

Edward Wisnowski, Councilor

From: Judy Rios <jrios@townofclay.org>
Sent: Friday, August 8, 2025 2:52 PM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] DEIS Comment re: Micron Project Town of Clay
Attachments: Micron DEIS Review for ToC.docx

Good afternoon -

Please find attached comments for inclusion in the public record regarding the Draft Environmental Impact Statement (DEIS) for Micron. These comments are submitted in accordance with the public comment deadline of August 11, 2025.

Thank you for your attention to this matter.

Sincerely,

Judy Rios
HR Executive/Administrator



Supervisor Damian M. Ulatowski
4401 State Route 31
Clay, NY 13041

These sections and associated appendices were evaluated on potential impacts on the residents, businesses, and infrastructure in the Town of Clay, the municipality where the Micron facility will be located.

The following sections were included in the review:

Section 0.0 – Executive Summary

Section 3.6 – Air Quality

Section 3.7 - Greenhouse Gas Emissions, Climate Change, and Climate Resiliency

Section 3.8 – Solid Waste, Hazardous Waste, and Hazardous Materials

Section 3.11 – Transportation and Traffic

Appendix I – Air Quality

Appendix J - Greenhouse Gas Emissions, Climate Change, and Climate Resiliency

Appendix K – Solid Waste, Hazardous Waste, and Hazardous Materials

Appendix M – Transportation and Traffic

Based on our review of the above sections and materials, we offer the following comments which are organized by technical discipline.

Waste and Hazardous Materials Comments

Comment #1: Receipt, handling, storage, and use of various hazardous chemicals are expected in operations. The appropriate plans and policies meeting State and Federal requirements will need to be adhered to.

The DEIS describes Micron’s plan to comply with State and Federal requirements associated with the receipt, handling, storage, and use of various hazardous chemical expected to be used in its operations. This will involve the preparation, review and update, and adherence to various plans and policies, including but not necessarily limited to the following plans and policies.

- *Spill Prevention, Containment and Countermeasure (SPCC) Plan:* An SPCC that will identify the number, size, location, and operational details for on-site oil storage vessels, oil-filled electrical equipment, and oil-filled operational equipment and provide procedures for preventing and controlling releases from these vessels;

- *Spill Prevention Report (SPR)*. An SPR that will identify the number, size, location, and operational details for on-site chemical storage vessels and process equipment and provide procedures for preventing and controlling releases from these vessels

The SPCC and SPR plans should include provisions for adequate on-site petroleum and chemical control equipment and materials, such as manhole covers, spill containment adsorbent materials, temporary dikes, etc. These must be addressed in the SPCC and SPR plans and are subject to NYSDEC and USEPA oversight.

- *Risk Management Plan/Program (RMP)*: An that will apply to listed Regulated Substances identified by the USEPA under section 112[®] of the Clean Air Act and that will include a “hazard assessment that anticipates the potential effects of any accidental chemical release that could occur at the Micron Campus, with an evaluation of worst-case and alternative accidental release scenarios; a chemical accident prevention program including safety precautions, maintenance and monitoring measures, and employee training; and a chemical accident emergency response program detailing the emergency response procedures Micron would provide for emergency employee care and notify relevant agencies, local first responders, and the public should an accident occur.”

These plans are all specific to the on-site operations of Micron. The various chemicals and petroleum products that are expected to be required will be delivered to the facility by over-the-road vehicles or by rail. An accidental release of a regulated substance, whether at the plant or in the nearby communities during transit, has the potential to impact the surrounding community and will rely on the expertise and training of local emergency response agencies and resources. This must include emergency response and incident command knowledge that is specific to the nature and quantity of chemical materials that may be involved. This may require additional training of local responders in the specific risks posed by these materials, as well as procurement and maintenance of additional response resources at the local level.

Comment #2: Emergency response services for spills or releases.

Clarification is requested if Micron will maintain on-call contracts with appropriately trained and equipped private emergency response and cleanup contractors that would be prepared to mobilize and address any spills or releases on an emergency basis.

Comment #3: The facility may be required to prepare and submit to USEPA a Facility Response Plan.

Based on the anticipated combined petroleum and oil storage capacity of 1.55 million gallons, the facility may also be required to prepare and submit to USEPA a Facility Response

Plan if all petroleum storage vessels are not equipped with adequate secondary containment, per the requirements of 40 CFR Part 112.

Transportation and Traffic Comments

Comment #1: Town of Clay land use should be considered for transportation improvements.

The Traffic Impact Study (TIS) mentions future land use, but it is unclear what was used for the analysis in the TIS. Requesting clarification if the land use, speed, and conceptual locations considered for the Three Rivers along Maider Road, the Complex along Morgan Road and the Historic Clay Center at Willer Canning Road.

Comment #2: Impacts to emergency services is not addressed.

The Clay Fire Departments are located at NYS Route 31 near McNamara Dr and Caughendoy Rd near the NY Route 481 off ramp. For context the Cicero Fire Department is at NYS Route 31 at US 11, and the Moyers Corner Fire Department is at NYS Route 31 at Oswego Road. These emergency services use of NYS Route 3, Maple Road, and Caughdenoy Road are crucial to maintain emergency response times. The TIS contains no content on impacts to emergency services. Clarification is requested if the following were considered.

- Evaluation on an impact to response times therefore impacting the need for additional fire department facilities.
- Coordination during construction for impacts to emergency services and their facilities.
- The impacts to the fire department building at US 11.

Comment #3: Verplank Interchange

The improvements show a Verplank interchange but no traffic data results are shown. This new interchange will assist drivers with alternative east and west connections without having to use NYS Route 31, especially during busy construction activities.

Comment #5: Impacts to Traffic Signals on Route 31

Currently the tightly spaced signals along NYS Route 31 from Oswego Road to the NYS Route 481 interchange appear to not be coordinated during the morning and afternoon peak hours. Local drivers complain often of the inefficiency of these signals due to their lack of coordination. Traffic signals should be coordinated to improve flow efficiency, especially with the potential increase in traffic volumes. Additional congestion

management technology should be explored such as adaptive signal timings for construction and as permanent measures.

Traffic signal preemption for emergency services and transit would improve emergency response times and assist in emergency vehicles navigate through traffic congestion. Transit priority at signals would also encourage the use of other modes. Transit should be coordinated with the ongoing SMTC Route 31 Corridor Study.

Comment #6: Lighting should be considered at additional locations while balancing light pollution.

The TIS mentions improved roadway lighting to enhance safety. The Project Cost sheets in Appendix M show lighting is not an improvement at intersections and only at interchange ramps. With the increase in pedestrian and bike enhancements it would be beneficial to have increased roadway lighting or pedestrian lighting. Additional information is requested at where lighting is expected to be placed, and should be considered for intersections and at locations to enhance safety for pedestrians and bicyclists.

Comment #7: Proposed improvements are mainly focused on state roads.

It appears that most of the roadway improvements are being made along State Roads. Additional work should be considered for side streets, County Roads, and those at a local level. Construction staging and sequencing are a concern for how that will occur and the impacts at each implementation stage. The following are comments focused on specific proposed improvement locations,

NYS Route 31: Transportation Appendix M shows concept improvements with a raised median along most of NYS Route 31. This is a major change to access management and would mean side streets and driveways for businesses and residents that previously had direct access would now require to u-turn at signalized intersections. The traffic analysis does not appear to show increased u-turns at these intersections, and so the improvement concepts do not match the traffic analysis. A raised median should be discussed with emergency services to understand the impacts that would have on response times.

The Appendix M concept improvements show a standard sidewalk and a wide shared use path along NYS Route 31 but not along side streets. Pedestrian and bicycle accommodations should be considered along side streets to connect to residential and commercial areas. While these roads are outside of NYS jurisdiction, other jurisdictional owners and agencies should be coordinated with to connect and build improvements for other modes.

Concept improvements do not show bus pull-off bays, transit improvements should be considered if transit will be used and accommodated along NYS Route 31.

Concept improvements at Caughdenory Road show current access to NYS Route 31 becoming a cul-de-sac, no longer providing direct access. Drivers now have longer travel times and additional distance to travel traveling from NYS Route 31 to Caughdenory. Justification should be provided for this change.

Interchange at NYS Route 31 and I-81: The new interchange at NYS Route 31 at I-81 shows the northbound on-ramp is cutting off Pardee Rd access.

- How will vehicles along RT 31 and the surrounding neighborhoods access the business and residences along Pardee Road?
- How will drivers coming from NYS Route 31 and visiting the businesses to the east of the interchange, for example Dunkin' Donuts, return to Lakeshore Road or other residential neighborhoods to the east along NYS Route 31?

New Access Road: Caughdenory Road currently feeds many residential homes, because of this, large tractor trailers and dump trucks should be discouraged from using Caughdenory Road. The increased noise, pollution, and vibration would not be a welcome addition to this neighborhood.

- Will signage and commercial vehicle navigation try and encourage the use of the new Access Road that is likely zoned for this use, or alternative routes be proposed?

Comment #8: Utility Relocation Impacts

Major utility work is being performed, the impacts to the power line poles should be described and what those impacts will be to proximity to the road, residences, and businesses.

There is no mention of EV charging facilities which should be considered to help reduce emissions and entice alternative vehicle types.

Information for the Town:

Air Quality Impacts

The potential air quality impacts associated with the Micron project include temporary impacts associated with construction, long term operation of the facility, and mobile emissions associated with additional vehicles traveling to the Micron location both during construction and operation of the facility. As with any construction project, the emissions of criteria pollutants such as particulate matter (PM) associated with soil disturbance and material handling as well as carbon monoxide (CO), oxides of nitrogen (NOx), volatile organic compounds (VOCs), and sulfur oxides (SOx) associated with the combustion of fuels in both on-road and non-road vehicles will increase. According to the DEIS, construction emissions associated with the project would have a temporary adverse impact on air quality. Micron has proposed controls (such as the rail spur) and best management practices (BMPs) to reduce the emissions of criteria pollutants during construction.

The operational facility will increase the emissions of criteria pollutants, non-combustion PM and VOCs and hazardous air pollutants (HAPs), such as hydrochloric acid, hydrofluoric acid, and organic HAPs. Based on Federal and State regulations, the Micron facility will employ control equipment, including acid and ammonia scrubbers, thermal oxidizers, and point of use systems. Based on the DEIS, it appears that Micron has addressed the applicable Federal and State regulations, conducted the necessary ambient air quality modeling, and will implement the necessary air pollution controls.

There will also be an increase in vehicular traffic in the vicinity of the proposed facility associated with the project as well as induced population growth. Transportation modeling was conducted at various intersections indicated that PM and CO are not expected to have a significant adverse effect on local air quality.

Despite the increase in criteria pollutants and HAPs, the DEIS indicates that the ambient air quality in the area of the proposed Micron facility from both stationary and mobile sources is not expected to result in significant adverse air quality and not expected to exceed any National Ambient Air Quality Standards (NAAQS), NYSDEC Short-term Guideline Concentrations (SGCs) or Annual Guideline Concentrations (AGCs). Micron will obtain the necessary Title V Air Permit and comply with applicable Federal and State air regulations. The facility will utilize Best Management Practices (BMPs) to control of fugitive dust associated with on-site and offsite activities and transport, controls for the reduction of both criteria or HAP pollutants as well as minimize sulfur compound emissions.

It should be noted that the operation of the railroad spur would emit particulate matter due to material handling, while the childcare site and warehouse would have criteria pollutant

emissions associated with combustion. These emissions would be insignificant compared to the emissions from the Micron site.

In addition, Onondaga County's Oak Orchard Wastewater Treatment Plant (OWWTP) will be upgraded to receive process DRAM wastewater from Phase 1 (first two units) operations of the Micron facility. For Phase 2 (Units 3 and 4), Onondaga will construct new WWTP treatment train to handle pretreated process wastewater, returning reclaimed water back to Micron. The existing OWWTP has a Air Facility Registration for air emissions for the facility, which would need to be modified for the any new pollutants any new sources of air emissions.

Greenhouse Gas Emissions, Climate Change, and Climate Resiliency

There will also be an increase in greenhouse gas (GHG) emissions during construction and operation of the proposed Micron facility. GHGs include carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O) and fluorinated gases (F-GHGs). Unlike criteria pollutants and HAPs, GHGs typically do not cause local air quality effect, but rather contribute to the overall increase in GHGs throughout the planet. Fluorinated gases used in the semiconductor manufacturing are especially potent and long-lived with some remaining in the atmosphere for 1000s of years.

The Micron project will be responsible for an increase in GHGs in the construction, operation, and associated traffic from the facility. Construction GHG emissions are primarily from the combustion of petroleum fuels from non-road equipment and generators. Operation GHG emissions will result from using fluorinated GHGs, N₂O, CH₄, and CO₂ as raw materials in manufacturing processes, from oxidation of organic compounds in thermal oxidation systems and RCTOs, from the combustion of natural gas and diesel, and from leaks of HTF. In addition, the indirect GHG emissions from the use of electricity (Scope 2) emissions will be significant when the Micron facility is in operation.

Long-term mobile GHG emissions are associated with the increase in traffic for the project. According to the DEIS, the long term operational mobile sources related to the proposed project in year 2041 would increase GHG emissions within the regional study area by 2 percent.

As mentioned previously, GHG emissions is a global concern and does not affect the local air quality. GHG emissions are attributed to climate change with an increase in Statewide average temperature by 3 degree F since 1970, with increases "heat island effect", decreased groundwater table, as well as a greater number and strength of extreme weather events creating potential flooding events. These impacts are not anticipated to be

significant for the project area, but Micron has incorporated the following into the design of the facility:

- Use of Stormwater Management Practices such as wet extended detention pond, infiltration basins, and filtration bioretention controls.
- Facility and associated infrastructure will be designed to withstand climate impacts.
- Install mitigation measures to reduce GHG emissions
- Purchase 100% carbon-free electricity via:
 - Power Purchase Agreements (PPAs)
 - Renewable Energy Credits (RECs)

Although not associated with the Micron project, the Town of Clay could experience issues with Town infrastructure associated with climate change. However, as noted in the DEIS, the proposed Micron project is not anticipated to significantly affect the climate resiliency of the surrounding area.

From: Kylie Visconti <kjrich171@gmail.com>
Sent: Friday, August 8, 2025 12:10 PM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Micron

Hello,

I am writing you to tell you that this is a huge mistake. The environmental impact is too great. This place is going to consume more water in one year than all of Syracuse combined. They are already asking for another pipeline for water. Not to mention all the wildlife you are going to displace and KILL off. In the end Syracuse does not need this big of a facility anywhere near it.

Kylie

Archived: Thursday, August 14, 2025 10:25:41 AM

From: marjbsn@aol.com

Mail received time: Sat, 9 Aug 2025 19:22:45

Sent: Sat, 9 Aug 2025 19:22:34

To: [chipsnepa](#)

Subject: [EXTERNAL] Micron building in my area.

Importance: Normal

Sensitivity: None

I know many are anxious for you to start building and come into Clay ,NY with your new, shinny plant. but I wish you would not come here.

My family moved to Brewerton NY over 30 years ago from the city of Syracuse. It was about 40 minutes away from Syracuse and our jobs as teachers for the Syracuse City school District. But, it was a wonderful escape into the rural community. We have a home on Oneida lake and have enjoyed living with the wildlife, the open spaces, and the nearby farms. The less polluted air, the garden I grow, the small shops I frequent will be negatively affected by your coming here. The land you are going to rip apart and cover with concrete currently is absolutely beautiful. Lush with trees, native grasses, and wildlife. Once you pollute this space, it will never recover. I do not want you here. In the end

, this space will be polluted and desecrated and left to rot when you inevitably decide to move on and need/want a different physical location or a better economical deal elsewhere. My children will have to move elsewhere to escape again. Marjorie Canino

Archived: Thursday, August 14, 2025 10:26:51 AM

From: [Cinnabar](#)

Mail received time: Sat, 9 Aug 2025 21:30:44

Sent: Sat, 9 Aug 2025 21:30:38

To: [chipsnepa](#)

Subject: [EXTERNAL] Fw: comment on Micron: against Micron moving in

Importance: Normal

Sensitivity: None

Re-sending my previous email because it was returned to me as undeliverable, which should be addressed as the public comments were not continuously open until August 11th.

----- Forwarded Message -----

From: Cinnabar <one_oclock_fox@yahoo.com>

To: CHIPSNEPA@chips.gov <chipsnepa@chips.gov>

Sent: Saturday, August 9, 2025 at 01:29:51 PM EDT

Subject: comment on Micron: against Micron moving in

To Whom It May Concern,

I am writing today because I wanted to voice my opinion that approving Micron to build an extra large complex is not a good deal for the State of New York or the local people.

In addition to displacing wildlife and severely impacting water systems in negative ways, we can look to history to understand the boom and bust cycle of companies like this coming into an area. Typically there is great excitement originally in the belief that there will be job creation, but companies like this thrive on tax breaks, money from taxpayers, special privileges, and then more money later on down the road when they decide to move their industry somewhere else and the state and local governments are desperate for them to stay. In a way, these situations are a version of a Ponzi scheme.

Great amounts of infrastructure must be built which impacts the environment and people. Already the traffic congestion and land speculation in the area is outrageous. It will get worse, and never really get better. These things swell until they burst.

We have only to look at Onondaga Lake and Allied Chemical to see the future of the wetlands and waterways in this area. Operations like this, including aspects of AI, consume water at an incredible, unfathomable rate and create continuous pollution.

We also have only to look at IBM operations of the past to also see this pattern play out. Hope for jobs, short boom period with taxpayers paying in and special dispensations on every level, the company uses up as many resources as it can access, and then they will move on and leave the area destitute.

This is not a long term, sustainable deal for Upstate New York.

Please count my voice as a voice against Micron coming in.

Sincerely,

Tracey Canino

Archived: Thursday, August 14, 2025 10:25:22 AM

From: [Cinnabar](#)

Mail received time: Sat, 9 Aug 2025 17:30:02

Sent: Sat, 9 Aug 2025 17:29:51

To: [chipsnepa](#)

Subject: [EXTERNAL] comment on Micron: against Micron moving in

Importance: Normal

Sensitivity: None

To Whom It May Concern,

I am writing today because I wanted to voice my opinion that approving Micron to build an extra large complex is not a good deal for the State of New York or the local people.

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This is not a long term, sustainable deal for Upstate New York.

Please count my voice as a voice against Micron coming in.

Sincerely,

Tracey Canino

From: Mike Demeter <mgdemeter@gmail.com>
Sent: Saturday, August 9, 2025 1:20 PM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] EIS Comments

**Micron Draft Environmental Impact Statement
Concerns of Immanuel Evangelical Lutheran Church**

Immanuel Evangelical Lutheran Church 4947 Route 31 in the hamlet of Clay is located less than 1/2 mile west of the Micron campus on Route 31. The congregation has been active in Clay for many years, having recently celebrated our 200th anniversary in 2023. Throughout that time, we have been dedicated to service in the Clay community. While we are excited to see the Micron development and the jobs and opportunities it will bring, we have some concerns regarding the impact it will have on our ministries and property.

Many of our community activities involve the use of our buildings. In addition to our regular Sunday services, we host an active Food Pantry and a monthly Free Senior Citizens lunch. We sponsor a weekly AA meeting in our Fellowship Hall and Companionate Friends, an organization dedicated to suicide prevention, holds their monthly meeting there. The Kyle Schneider Foundation that assists veterans is also based in our building. As you can see, access to our facilities is essential to carry out this work.

We are concerned about the effect and magnitude of the roadworks connected to the project, particularly with Route 31. Our church, built in 1916 is 25 feet from the edge of Route 31, and we have nearly 300 feet of frontage. According to the Draft EIS, Route 31 could change to a major four lane road. This will have a significant impact on our church and parking lot. When will a decision be made regarding the changes to Route 31? What is the proposed construction schedule for this and associated roads? Not knowing what the impact of these changes will be makes it very difficult to plan for building maintenance and updating.

We are also concerned with the environmental impact the project will have on the immediate area. Will the noise of construction interfere with our services? What is the effect of the dust and chemicals on us? I know you are actively planning and working to mitigate these effects but due to our proximity to the project we are very concerned.

We welcome any discussion on how our facilities can be of use to Micron during all phases of this project. Immanuel has a history of helping our neighbors and we welcome any ideas on how we can be an asset to Micron and all the people involved.

Michael Demeter
Immanuel Evangelical Church of Clay
Council President

From: Winston Gedicks <wcgedicks@gmail.com>
Sent: Saturday, August 9, 2025 11:58 AM
To: chipsnepa@chips.gov
Subject: [EXTERNAL] Public Comment Micron Project

To whom it may concern,

I am concerned that the proposed plant will cause a tremendous amount of irreversible and long term environmental damage. We do not know what health risk our towns neighborhoods will face with this plant. Will Clay become the next Love Canal?

With the current viaduct project, our infrastructure is already at capacity. Construction of the manufacturing facility would only add to the already at capacity roadways. In addition thousands of trucks going in and out nonstop over the next decade or so would create an unnecessary amount of air, noise, water pollution.

The area of northern Onondaga county is home to a unique and ecological wetland habitat. Much of these wetlands have been lost through urbanization and agriculture practices. Once lost these places can never be replaced to exhibit the ecological importance.

I hope our elected officials will listen and understand that the health and happiness of our ecosystem is more important than a few numbers on chart.

Thank you,

WG

From: Michelle Stewart <msstewartnaacpsyrny@gmail.com>
Sent: Monday, August 11, 2025 3:49 PM
To: Gwendolyn
Cc: chipsnepa@chips.gov
Subject: [EXTERNAL] Re: NAACP Syracuse and Onondaga County COMMENTS - MICRON DEIS

No problem, thank you for the update.

On Sat, Aug 9, 2025 at 10:03 PM Gwendolyn <syrnaacpprez@gmail.com> wrote:

The Syracuse Onondaga County NAACP is resubmitting comments to the MICRON DEIS as it was noted that the inside address identified the incorrect county in the previous submission. Our apologies for any inconvenience.

NAACP

Syracuse and Onondaga County

August 9, 2025

VIA Email to: chipsnepa@chips.gov

Onondaga County Industrial Development Agency
335 Montgomery Street
Syracuse, New York 13202

Attn: Micron Project

The National Association for the Advancement of Colored People (NAACP) has reviewed the Micron Semiconductor Manufacturing Project, Clay, NY, Draft Environmental Impact Statement (EIS). Our review focuses on the project's potential implications for environmental justice and the well-being of all communities, particularly those identified as disadvantaged, minority, or low-income.

The NAACP recognizes the project's stated purpose to revitalize the U.S. semiconductor manufacturing industry, accelerate domestic production of cutting-edge logic and memory chips, and catalyze long-term economically sustainable growth, supporting U.S. economic and national security. We also acknowledge the commitment to attracting new semiconductor manufacturing projects to New York, including through measures like the New York Green CHIPS Program, which aims to create thousands of jobs and attract billions of dollars.

Environmental Justice Analysis and Key Findings:

- The EIS includes a dedicated Environmental Justice section (Section 3.16), which assesses potential effects on Disadvantaged Communities (DACs) and minority or low-income communities, in accordance with New York State laws and policies such as the Climate Leadership and Community Protection Act (CLCPA) and NYSDEC Commissioner Policy 29 (CP-29). These policies require state agencies to consider the effects of their actions on DACs and avoid disproportionately burdening them.
- The EIS identifies DACs primarily in the City of Syracuse, Village of Baldwinsville, City of Fulton, and City of Oswego. It notes that the Town of Clay, where the majority of the Proposed Project would be located, is predominantly non-minority and non-low-income.
- The closest DAC to the Proposed Project site is identified as five miles south in North Syracuse (Census Tracts 140 and 144). Census Tract 144 is noted as having comparatively higher burdens and vulnerabilities, including housing vacancy rate and highway truck traffic.
- The EIS also identifies **two minority block groups in the Town of Clay** near Onondaga

P O Box 11081, Syracuse, NY 13218
Syracusenaacp.com 315.440.6340

Lake and notes that the **nearest low-income community is approximately one mile north in Brewerton** in the Town of Cicero. Furthermore, **five low-income communities and portions of six DACs are located within a half-mile of the Connected Actions**, primarily relating to water supply pipeline and facility upgrades.

While the EIS concludes that the Preferred Action Alternative would **not cause or increase a disproportionate pollution burden** on DACs or minority/low-income communities from construction or operation, the NAACP emphasizes the critical need for vigilant oversight and concrete commitments to ensure that potential adverse effects, even if not deemed "disproportionate," do not unduly impact these communities.

Specific Areas of Interest and Recommendations:

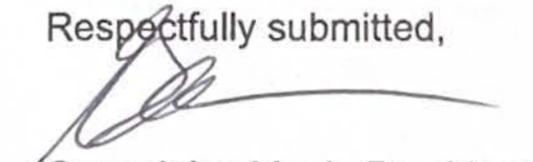
- **Housing Affordability and Indirect Displacement:** The EIS identifies a **potential short-term significant adverse effect on housing** due to induced growth, specifically the risk of **increased rents and property values** in communities within the local study area, such as the low-income community in Brewerton (CT 102 BG 4). Although the EIS states that planned housing projects and Micron's coordination with stakeholders are expected to mitigate this, the NAACP demands **concrete, measurable commitments to support and expand affordable housing initiatives** to prevent indirect displacement for existing residents. Transparent plans outlining how Micron and local agencies will ensure adequate, affordable housing options are available are essential to prevent displacement of vulnerable populations.
- **Water Resources and Indigenous Concerns:** We note the concerns raised by the Onondaga Nation regarding fish and water quality in Onondaga Lake, Lake Ontario, and the Oneida River. While the EIS states that the Preferred Action Alternative would not result in significant adverse impacts on water quality or aquatic life and proposes mitigation measures such as a Wetland Mitigation Plan and stormwater Best Management Practices (BMPs), the **unavoidable permanent loss of approximately 193.38 acres of federal jurisdictional wetlands** (and 10.5 acres of non-jurisdictional wetlands) is a significant environmental impact. We urge continuous, transparent monitoring of water quality and the effectiveness of all mitigation efforts, with active involvement of affected communities, including Indigenous Nations, in the oversight process.
- **Traffic and Noise Impacts:** The EIS predicts **significant adverse noise effects** from construction and operation of the Micron Campus, Rail Spur Site, and Childcare Site, affecting 51 sensitive receptors, including an apartment complex and a nursing home. Additionally, **significant traffic noise effects are anticipated** primarily along major roadway corridors (NYS Route 31, Caughdenoy Road, NYS Route 481, and U.S. Route 11), potentially affecting approximately 520 dwelling unit equivalents. While mitigation measures are proposed, some noise barriers are deemed infeasible due to property

access. The NAACP calls for the prioritization of effective noise and traffic mitigation measures that protect *all* residents, especially those in close proximity to the project and its transportation corridors, ensuring their quality of life is not unduly compromised.

- **Strain on Community Facilities (Fire Services):** The potential significant adverse effect on volunteer fire services due to induced growth is acknowledged, with Micron committing to pay for and support ongoing training efforts with Clay Fire and other local fire departments. Micron also proposes to work with Clay Fire to determine the future need for a full-time professional fire service through a feasibility study or similar method. We emphasize the need for these commitments to translate into **equitable and robust support for all emergency services** serving the expanded population, ensuring that public safety is not compromised in any community, including those which are low-income or minority.
- **Beneficial Effects and Community Investment Fund:** We acknowledge the project's projected beneficial effects, including thousands of new jobs and regional economic development. Of particular note is the proposed **\$500 million investment over 20 years through the Green CHIPS Community Investment Fund (CIF)** for local and regional initiatives. The NAACP advocates for **direct and equitable allocation of these funds to DACs and minority/low-income communities** to address their specific needs and vulnerabilities, ensuring that the benefits of this development are broadly shared and help to rectify existing inequities. Transparency in the allocation and impact of these funds is paramount.

Ongoing Engagement and Accountability: The NAACP stresses the critical need for **continued, meaningful engagement with all affected communities**, particularly DACs and minority/low-income communities, throughout the project's lifecycle. We urge the lead agencies, CPO and OCIDA, and Micron, to establish **transparent and accessible mechanisms for ongoing public accountability** regarding all environmental, social, and economic impacts, including adaptive management strategies for unforeseen issues. We look forward to the opportunity to provide further comments and engage in the decision-making process to ensure that the Micron Semiconductor Manufacturing Project is not only economically successful but also serves as a model for **truly equitable and environmentally just development** in New York State.

Respectfully submitted,



Gwendolyn Muok, President

NAACP

Syracuse and Onondaga County

August 9, 2025

VIA Email to: chipsnepa@chips.gov

Onondaga County Industrial Development Agency
335 Montgomery Street
Syracuse, New York 13202

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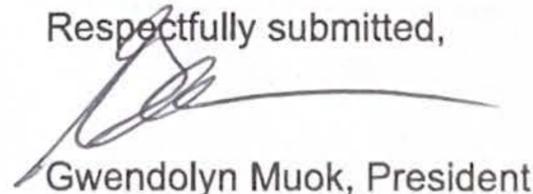
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Respectfully submitted,



Gwendolyn Muok, President

From: PACNY Admin <email@pacny.net>
Sent: Saturday, August 9, 2025 3:34 PM
To: chipsnepa@chips.gov
Subject: [EXTERNAL] ATTN: Micron Project
Attachments: 2025-08-11_Comment from the Preservation Association of Central New York.pdf

Good afternoon,

Please find attached to this email comments submitted by the Preservation Association of Central New York (PACNY).

Thanks you,
PACNY's Board of Directors



August 10, 2025

Onondaga County Industrial Development Agency (OCIDA)
ATTN: Micron Project
335 Montgomery Street, Floor 2M
Syracuse, New York 13202

To Whom it May Concern:

Comment from the Preservation Association of Central New York (PACNY) on the Micron Draft Environmental Impact Statement

The Preservation Association of Central New York (PACNY), whose mission for the past 50 years has been to promote the preservation of the historical and cultural resources of Central New York, offers the following comments on the Draft Environmental Impact Statement (DEIS) for the Micron Semiconductor Manufacturing Project in Clay, New York.

PACNY serves the five-county region of Onondaga, Oswego, Madison, Cortland, and Cayuga Counties—matching the area of potential induced growth identified by Micron in its DEIS. This alignment presents an important opportunity to ensure that cultural resource considerations are fully integrated into the document, reflecting the significance of these resources within the area likely to experience the project’s indirect impacts.

Need for Attention to Historic Properties in Induced Growth Areas

The DEIS notes that the proposed project will result in “significant changes to land use” across the five-county region due to induced growth, which “would potentially result in upzoning existing residential and commercial districts for higher density or occur outside of districts already zoned” for development (DEIS p. 3-34). However, the document provides only limited analysis of how such widespread land use change could affect historic resources—particularly in rural, agricultural, or historically residential areas where unregulated growth may alter historic context, fabric, and community identity.

The only mention of this concern appears in the following brief statement:

Induced growth throughout the five-county region has the potential to affect historic architectural properties. Although it cannot be predicted exactly when, or to what degree, induced growth would affect historic architectural properties... (DEIS p. 3-143)

This language does not fully convey the likelihood that growth in these areas could lead to the demolition, neglect, or irreversible alteration of historic buildings, landscapes, and districts. A more detailed and proactive assessment could help identify and mitigate these potential impacts.

Housing Crisis and the Definition of “Existing Rental Units”

The DEIS states:

Housing demand in the areas of highest population growth is not expected to be met by existing rental units and for-sale homes... (DEIS p. 3-32)

However, it does not clarify whether the term “existing rental units” refers only to housing that is currently habitable and available, or also includes the many units in the City of Syracuse and nearby villages that are vacant or underutilized due to disrepair and long-term disinvestment. This distinction is important: if part of the region’s housing shortage is linked to the underuse of existing housing stock, then focusing solely on new construction on open land may inadvertently divert demand and resources away from the urban core.

Without targeted strategies to address these issues, there is a risk that the project could unintentionally contribute to further population loss in Syracuse—perpetuating the long-term impacts of mid-20th-century urban renewal and highway construction, particularly in historically marginalized communities—and reinforce patterns of sprawl, disinvestment, and economic disparity.

Growth Models and Long-Term Impact

The population growth models predicting tens of thousands of new households by 2041 (e.g., up to 23,500 in Onondaga County and 7,500 in the City of Syracuse) are presented with confidence but without sufficient explanation of methodology or contingencies. These projections should be examined closely in light of changing remote work trends, housing market volatility, and shifting migration patterns. A flawed model could result in overbuilding and unsustainable infrastructure expansion.

PACNY encourages Micron and reviewing agencies to clarify what specific measures will be taken to promote urban residency—particularly within Syracuse, where infrastructure, housing stock, and public services already exist—and to outline incentives for infill development and the rehabilitation of historic homes.

Cultural Landscape and Open Space as Heritage

Open space and agricultural land in Central New York are not simply “vacant” or “underutilized” parcels awaiting development—they are integral to the region’s cultural

landscape and rural heritage. The DEIS appears to assume these lands are available for transformation with limited attention to their historic significance or community value. If consumed by speculative subdivisions or generic corporate parks, the region risks losing elements of its distinct identity.

Equity and Community Benefit

This project raises important questions about equity and shared benefit: Will there be funding not just for new construction, but also for the stabilization of historic neighborhoods in Syracuse and other legacy cities? Will cultural organizations that anchor and enrich communities be eligible for support? Will residents at risk of housing insecurity due to rising costs or displacement have access to assistance?

Experience with GlobalFoundries in Malta, New York, shows that the workforce catchment area will extend at least 40 miles in all directions—reinforcing the importance of considering regional impacts in planning and mitigation.

Conclusion

PACNY encourages all reviewing agencies to ensure a robust and equitable approach to addressing the known indirect effects of this project. This should include:

- A comprehensive review of historic resources in areas likely to experience induced growth;
- Incentives for urban infill and historic housing rehabilitation;
- Clear justification of growth modeling assumptions; and
- Funding for emergency housing, historic preservation, and cultural organizations in affected communities.

We look forward to collaborating with state and local partners to ensure that Central New York's cultural heritage is protected and strengthened as part of this significant economic development effort.

Sincerely,

The Preservation Association of Central New York (PACNY)

Archived: Thursday, August 14, 2025 10:20:01 AM

From: [Bob Peters](#)

Mail received time: Sat, 9 Aug 2025 04:10:18

Sent: Sat, 9 Aug 2025 04:10:07

To: [chipsnepa](#)

Subject: [EXTERNAL] I'm Robert Peters of Jamesville, NY, and I'm commenting against Micron for several reasons. New Paragraphs

Importance: Normal

Sensitivity: None

The 2nd to 6th paragraphs from the bottom are new, the rest you might have gotten before.

I'm Robert Peters of Jamesville, NY, and I'm commenting against Micron for several reasons. One reason I'm against it, is that it will ruin an irreplaceable natural environment, for a company that will probably not keep any of their promises, in letter or in spirit, and probably leave once the tax breaks expire. Everything else that this County has given tax breaks or other benefits to, has never worked out like the people who want the tax breaks and benefits claim. DestinyUSA has to be the biggest example of this in this County that I have heard of. They promised, among other things, an aquarium and a replica of the Erie Canal. What we got instead was a rather standard mall with a mishmash of flooring, that also bounces when people walk by. Also other places have had private projects supported by the government not work out. Examples include that Foxconn factory in Mount Pleasant Wisconsin that never got used, damaged the village's credit rating, and ended up becoming a data center site, and that research facility expansion in New London, Connecticut that was canceled after a merger that led to the research facility being closed and the area looking like a slum.

Another reason that I'm against it, is that it will take 20 years to build and that is a long time in real terms, and an eternity in tech terms. For example a child born today, could be in their 2nd year of college in 20 years, if they decide to go to college. Who knows what innovations in technology there will be in 20 years, innovations that could render the plant obsolete before it's even half way finished. People didn't expect 20 years ago that the computer company that uses a logo that is a piece of fruit with piece bitten out of it, wouldn't be using the architecture that they had transitioned to at the time, 20 years later. Nor that they would radically change what we thought of a cell phone, nor that they would have developed their own CPU chips for their computers. That also applies to other businesses, as I wasn't thinking at the time that the last new brand to be introduced by a major automaker, wouldn't actually be around 20 years later.

It's entirely possible that a completely new way of making chips emerges that renders the current technology obsolete overnight. It's also possible that memory and storage starts getting put on the CPU die in 20 years, to save board space.

Also Micron also only makes commodity chips, and not anything that is really unique, so they are also easily replaced with another company's chips. Other companies actually make chips with some differentiation in functionality and performance. Micron only makes chips that have to be made to a standard, so there isn't any product differentiation between them and other makers of the same kinds of chips.

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getting saturated and being made useless. Also where are they going to get all of that dirt from, as it's soil and not the stuff used to get leverage over someone.

Also if National Grid is going to install smart metering, somebody at National Grid could turn off the power accidentally or accidentally on purpose, which would ruin a lot of production. Somebody might turn off the power because they want to reduce the load on the grid and not realizing what they are turning off the power to, or they want to sabotage production. A hacker or cyberwarrior could also get into National Grids systems and do the same thing, possibly to a wider area as well.

I'm also against it because it will use way too much electricity and will ruin our quality of life. The governor is trying to reduce the state's carbon emissions, which this facility is going to increase if built. One of the things she is doing to achieve that goal, is by replacing fossil fuels with electricity. That is going to increase the demand for electricity by a very large amount, as a heat pump is an air conditioner that can also operate normally in reverse, to take in heat from outside. The heating elements inside of the air handler of ducted heat pump systems, also take quite a bit of power. It also take quite a bit of power to charge all of the electric vehicles in a reasonable amount of time, or at all in some cases. The average house may end up needing a 300 amp service to handle all of those loads. That size of service is not all that common even now. This means that we probably can't handle both all of those demands and Micron, because there won't be enough generation and distribution capacity. And people will revolt if only Micron and the local elites can get electricity, as they didn't sign up for an Authoritarian state. I don't see National Grid beefing up the distribution infrastructure or increasing generation capacity, as they are surprisingly encouraging energy conservation. It's probably cheaper to do that, than to actually make upgrades. Micron will probably cause electricity prices to skyrocket, as they will use a lot of electricity and not pay for any upgrades. Micron will also mean that power outages will become more frequent, as National Grid's priority will be to keep Micron supplied with power, at the expensive of everybody else. That also means that natural gas service may end up getting interrupted because at least some compressor stations are electric, and that grid-tied solar systems without battery backup won't work.

Also they probably aren't going to hire any local people even if they say they will, which means the population will skyrocket which will strain local services and infrastructure, and make the Syracuse area an awful place to live. The Syracuse area can't deal with anymore garbage that it supplies now, and they apparently don't have any contingency plans for when the incinerator breaks down. People were actually panicking when it broke down the first time, and that place is beyond it's design life anyway and apparently they don't stock more than one of any given spare part. What happens if they end up breaking something that they don't have more of, and that part has a six month lead time. We might not be able to supply enough water and sewer capacity for everybody and Micron. You might be able to kick the sewer capacity problem down the road for 4 years, depending on how many septic systems are installed and how big they are, but the water problem would be immediate.

They also say that it will create "up to" jobs and not a fixed number of jobs, which means they could hire either nobody, or only 4 security persons to watch the site after they have abandoned it, and technically keep their promise. The phrase "up to" is a scary thing in this kind of thing, as it's easy for them to weasel out of it and still keep all of the government benefits that they received. It's like when they use "up to" in the reward for the apprehension of a criminal. They only way that they are going to pay out the full reward, is if you bring them in yourself and are shrewd negotiator. They are going to try to do anything to get out of paying the reward.

Personally if I was in charge of Micron, I wouldn't build the fab as it's a very poor use of company money. It would be better to abandon the project now and take a small hit to the price of the stock, or even possibly a boost to the price of the stock, then end up tanking the stock and the quarterly report because you essentially flushed a ton of money down the drain. There are way too many unknowns for spending money on this to be a sensible thing to do. This project is going to be like playing Jenga in bed or in a moving vehicle, as you don't know what's going to bring the whole thing crashing down, or when it's going to happen.

I don't know if anybody will even read this, or any comment on this project as they don't care about what the constituents want. They only care about who is lining their pockets. Now you may think that I'm cynic for thinking that, but a cynic is what an idealist calls a realist. I've heard rumors that say that the Onondaga County Executive takes kickbacks. That is true, one way or the other. I bet if you did a through investigation of most politicians, you would find that they have unexplained income or income that they don't want to tell you where it comes from, as it would incriminate them.

It's almost like we live in an Authoritarian state already, as stuff that the people don't like gets shoved down their throats. It's not their jobs are all that important anyway. If it all hit the fan, most of them would be useless in the situation anyway, as they don't know how to do anything. The jobs of garbage people, and the people who keep the water supply and sewer systems working, have jobs that are way more important than the jobs of the politicians. When the politicians stop working correctly nothing really changes, but when garbage people go on strike, it can bring a city to it's knees, both literally and metaphorically. A non-functional water supply or sewer system can cause major problems too, as a modern city can't function well without both. As long as everything gets funded, you really don't need politicians, because things can be setup to fund operations and the repairs and replacements of infrastructure automatically. Nothing has really changed much since the 1950s or 1960s anyway, so it's not like the politicians are actually doing anything useful. It's no wonder why people vote for the Authoritarian, since democracy doesn't appear to behave any differently, if we get stuff shoved down our throats anyway. Since the County Executive is an R-Word anyway, he feels that he has carte blanche to be an Authoritarian, since the orange man in the White House is one, or at least acts like one.

Also, both the Governor and the County Executive don't realize the nature of their relationship with the constituency. They think that they are kings ruling over subjects, but in reality they are a high school principal and we are the school board, since we are the ones that hire and fire, and we can ask them to leave. The people are technically their bosses, as we determine whether they get hired or fired and if they receive any promotions. The County Executive probably has problems with realizing that somebody else is the boss, as that might be at least part of the reason why he got divorced.

Politically, it would be safer for both of them to not go through with this project, as they can't do a James Chupaila if they don't go through with it. James Chupaila was the principal of Fayetteville Manlius High School from 1987 to 2010. Though he killed his career on June 19th 2009, when he told the parent's of yours truly and a person on the Spectrum, the day of the graduation, that I couldn't go to my graduation. My parent's were understandably furious, and let other parents know about what they were told, and probably including Nick Cappoletti. I went to my graduation ceremony anyway, and among the other people that showed up to the graduation that the principal probably didn't want showing up, was somebody who arrived in a hospital bed, and Nick Cappoletti son, Mark. There was no special graduation ceremony at the district office, for people in special education classes that year, like what they had done previously, and possibly after that. The school board ended up getting wind of the resulting firestorm, resulting in him probably getting a choice between leaving and getting fired. I don't know if they decided to get rid of him, because he pulled that stunt, or that it resulted in more people that they didn't want showing up to the graduation ceremony, showing up and ruining the image that they are a perfect school. The moral of the story is, that when your actions can result in something blowing up in your face, it's safest do to nothing. If James Chupaila hadn't made that phone call and let me attend the graduation without any fuss. The special graduation ceremony at the district office would've gone on with everybody else, and his career at Fayetteville Manlius would've lasted until at least 2015. But because he made the phone call, he ended up being reduced to serving as interim principal for three different school districts, and even then those might have not happened, if they knew the reason why he left and what he done June 19th 2009.

When the people are unhappy with something that somebody in power as done, they can vote them out or demand a reversal or their resignation. And even the party could be so unhappy with what he has caused that somebody primarys him and wins, or even worse, one of the big gray residents of Syracuse could beat him, the ones with the really long and flexible nose. Even communist parties have become tired of their leaders and have

gotten rid of them. Of course there are some people that, for various reasons, will take a different and more immediate, course of action. Somebody could make the County Executive disappear because he admitted that he doesn't care about people opinion's and just does what he wants, which is how a communist behaves. There maybe are still people out there who believe that communism, communists, and fellow travelers, must be eradicated by any means necessary. I wouldn't know from experience but, it seems to be easy to get rid of a body in this County as if you throw it out in the trash, it will be gone in three days, as that is how long the trash usually "stews" for at the incinerator before they burn it. The operators of the place mentioned that fact at one time. The option of burial in or under something exists but it's not a reliable method, as there is the possibility that it might eventually be found. Important people have disappeared without a trace before in the past. Judge Crater hasn't been seen since 1930 and Jimmy Hoffa hasn't been seen since 1975. I'm not one of those people who would resort to those kinds of things, but there are people who would, either because they are unstable, have nothing to lose, feel it's the only way to stop it, or they just want the "fame" that can come from killing somebody "important". Look at all of the people who are only remembered for killing somebody "important", though McKinley's assassin maybe less known than most of the others.

I'm honestly surprised that the County Sheriff hasn't made the County Executive's life a living H-E Double hockey sticks, by having an deputy working to rule following him everywhere he goes and stopping him for every law he violates, no matter how small, because of the Jamesville Penitentiary situation. It isn't police harassment if the County Executive is actually doing something illegal. Or that worse hasn't happened to him, since at least one deputy knows how to get away with it now. I don't know if anyone would miss him, though his ex-wife may not want to see her gravy train go down the mine. Of course they Sheriff would probably rather have him alive, as a Theodore Roosevelt quote says. The gist of the quote is, is when you have them by one pair of body parts, their hearts and minds will follow. That quote is kind of true, as some people will do anything to save their bacon.

If this project goes through, it will ruin the lives of the people who live in the Syracuse area. The cons outweigh the pros, so it would be best for all involved to abandon the project before starting. It would a massive environmental disaster and a massive waste of money for no benefit, so why even bother doing it. Everybody involved in starting the project may actually be out of office or dead in 20 years, but the environmental damage and the reduced quality of life would be permanent. The environment and quality of life is a lot more important than money and jobs that probably won't actually come. When it comes to projects like this in this day and age, you can't trust corporations to hold up their end of the bargain

Robert Peters

From: Robert Peters <sretepbob@outlook.com>
Sent: Saturday, August 9, 2025 12:17 AM
To: chipsnepa@chips.gov
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apparently they don't stock more than one of any given spare part. What happens if they end up breaking something that they don't have more of, and that part has a six month lead time. We might not be able to supply enough water and sewer capacity for everybody and Micron. You might be able to kick the sewer capacity problem down the road for 4 years, depending on how many septic systems are installed and how big they are, but the water problem would be immediate.

They also say that it will create "up to" jobs and not a fixed number of jobs, which means they could hire either nobody, or only 4 security persons to watch the site after they have abandoned it, and technically keep their promise. The phrase "up to" is a scary thing in this kind of thing, as it's easy for them to weasel out of it and still keep all of the government benefits that they received. It's like when they use "up to" in the reward for the apprehension of a criminal. The only way that they are going to pay out the full reward, is if you bring them in yourself and are shrewd negotiator. They are going to try to do anything to get out of paying the reward.

Personally if I was in charge of Micron, I wouldn't build the fab as it's a very poor use of company money. It would be better to abandon the project now and take a small hit to the price of the stock, or even possibly a boost to the price of the stock, then end up tanking the stock and the quarterly report because you essentially flushed a ton of money down the drain. There are way too many unknowns for spending money on this to be a sensible thing to do. This project is going to be like playing Jenga in bed or in a moving vehicle, as you don't know what's going to bring the whole thing crashing down, or when it's going to happen.

I don't know if anybody will even read this, or any comment on this project as they don't care about what the constituents want. They only care about who is lining their pockets. Now you may think that I'm cynic for thinking that, but a cynic is what an idealist calls a realist. I've heard rumors that say that the Onondaga County Executive takes kickbacks. That is true, one way or the other. I bet if you did a through investigation of most politicians, you would find that they have unexplained income or income that they don't want to tell you where it comes from, as it would incriminate them.

It's almost like we live in an Authoritarian state already, as stuff that the people don't like gets shoved down their throats. It's not their jobs are all that important anyway. If it all hit the fan, most of them would be useless in the situation anyway, as they don't know how to do anything. The jobs of garbage people, and the people who keep the water supply and sewer systems working, have jobs that are way more important than the jobs of the politicians. When the politicians stop working correctly nothing really changes, but when garbage people go on strike, it can bring a city to it's knees, both literally and metaphorically. A non-functional water supply or sewer system can cause major problems too, as a modern city can't function well without both. As long as everything gets funded, you really don't need politicians, because things can be setup to fund operations and the repairs and replacements of infrastructure automatically. Nothing has really changed much since the 1950s or 1960s anyway, so it's not like the politicians are actually doing anything useful. It's no wonder why people vote for the Authoritarian, since democracy doesn't appear to behave any differently, if we get stuff shoved down our throats anyway. Since the County Executive is an R-Word anyway, he feels that he has carte blanche to be an Authoritarian, since the orange man in the White House is one, or at least acts like one.

Also, both the Governor and the County Executive don't realize the nature of their relationship with the constituency. They think that they are kings ruling over subjects, but in reality they are a high school principal and we are the school board, since were are the ones that hire and fire, and we can ask them to leave. The people are technically their bosses, as we determine whether they get hired or fired and if they

receive any promotions. The County Executive probably has problems with realizing that somebody else is the boss, as that might be at least part of the reason why he got divorced.

Politically, it would be safer for both of them to not go through with this project, as they can't do a James Chupaila if they don't go through with it. James Chupaila was the principal of Fayetteville Manlius High School from 1987 to 2010. Though he killed his career on June 19th 2009, when he told the parent's of yours truly and a person on the Spectrum, the day of the graduation, that I couldn't go to my graduation. My parent's were understandably furious, and let other parents know about what they were told, and probably including Nick Cappoletti. I went to my graduation ceremony anyway, and among the other people that showed up to the graduation that the principal probably didn't want showing up, was somebody who arrived in a hospital bed, and Nick Cappoletti son, Mark. There was no special graduation ceremony at the district office, for people in special education classes that year, like what they had done previously, and possibly after that. The school board ended up getting wind of the resulting firestorm, resulting in him probably getting a choice between leaving and getting fired. I don't know if they decided to get rid of him, because he pulled that stunt, or that it resulted in more people that they didn't want showing up to the graduation ceremony, showing up and ruining the image that they are a perfect school. The moral of the story is, that when your actions can result in something blowing up in your face, it's safest do to nothing. If James Chupaila hadn't made that phone call and let me attend the graduation without any fuss. The special graduation ceremony at the district office would've gone on with everybody else, and his career at Fayetteville Manlius would've lasted until at least 2015. But because he made the phone call, he ended up being reduced to serving as interim principal for three different school districts, and even then those might have not happened, if they knew the reason why he left and what he done June 19th 2009.

When the people are unhappy with something that somebody in power as done, they can vote them out or demand a reversal or their resignation. And even the party could be so unhappy with what he has caused that somebody primaries him and wins, or even worse, one of the big gray residents of Syracuse could beat him, the ones with the really long and flexible nose. Even communist parties have become tired of their leaders and have gotten rid of them. Of course there are some people that, for various reasons, will take a different and more immediate, course of action. Somebody could make the County Executive disappear because he admitted that he doesn't care about people opinion's and just does what he wants, which is how a communist behaves. There maybe are still people out there who believe that communism, communists, and fellow travelers, must be eradicated by any means necessary. I wouldn't know from experience but, it seems to be easy to get rid of a body in this County as if you throw it out in the trash, it will be gone in three days, as that is how long the trash usually "stews" for at the incinerator before they burn it. The operators of the place mentioned that fact at one time. The option of burial in or under something exists but it's not a reliable method, as there is the possibility that it might eventually be found. Important people have disappeared without a trace before in the past. Judge Crater hasn't been seen since 1930 and Jimmy Hoffa hasn't been seen since 1975. I'm not one of those people who would resort to those kinds of things, but there are people who would, either because they are unstable, have nothing to lose, feel it's the only way to stop it, or they just want the "fame" that can come from killing somebody "important". Look at all of the people who are only remembered for killing somebody "important", though McKinley's assassin maybe less known than most of the others.

I'm honestly surprised that the County Sheriff hasn't made the County Executive's life a living H-E Double hockey sticks, by having an deputy working to rule following him everywhere he goes and stopping him for every law he violates, no matter how small, because of the Jamesville Penitentiary situation. It isn't police harassment if the County Executive is actually doing something illegal. Or that worse hasn't

happened to him, since at least one deputy knows how to get away with it now. I don't know if anyone would miss him, though his ex-wife may not want to see her gravy train go down the mine. Of course they Sheriff would probably rather have him alive, as a Theodore Roosevelt quote says. The gist of the quote is, is when you have them by one pair of body parts, their hearts and minds will follow. That quote is kind of true, as some people will do anything to save their bacon.

If this project goes through, it will ruin the lives of the people who live in the Syracuse area. The cons outweigh the pros, so it would be best for all involved to abandon the project before starting. It would a massive environmental disaster and a massive waste of money for no benefit, so why even bother doing it. Everybody involved in starting the project may actually be out of office or dead in 20 years, but the environmental damage and the reduced quality of life would be permanent. The environment and quality of life is a lot more important than money and jobs that probably won't actually come. When it comes to projects like this in this day and age, you can't trust corporations to hold up their end of the bargain

Robert Peters

From: katie purcell <kmprcll555@gmail.com>
Sent: Saturday, August 9, 2025 11:18 AM
To: chipsnepa@chips.gov
Subject: [EXTERNAL] Micron DEIS public comment

To whom it may concern,

My name is Katie Purcell and I am a lifetime resident, worker, and community member of Onondaga county. I am also a graduate of Syracuse's own SUNY College of Environmental Science & Forestry (ESF). As a community member and an individual who is personally committed to human and environmental health, I am writing to comment on the Draft Environmental Impact Statement (DEIS) for Micron Technology's proposed microchip fabrication facility.

Frankly, there are numerous issues with the project as it stands dictated by the DEIS. Firstly, the proposed facility requires the decimation and/or alteration of hundreds of acres of natural wetlands that fulfill multiple valuable roles on our planet; wetlands are carbon sinks, natural filtration in our water cycle, sequester water (which mitigates flooding risk), and crucial habitat for valuable wildlife -- particularly endangered & threatened species -- just to name a few vital ecosystem services. While the DEIS proposes to restore wetlands in other areas, this proposal does not account for several pertinent issues: 1) restored wetlands are not as effective in their ecological roles (such as the benefits listed above) nor are they as biodiverse as the original, aged wetlands that will be impacted by Micron's development; 2) the production of microchips requires the use of chemicals (including but not limited to PFAs) that are known to have harmful impacts on the environment, as well as those that exist in it (plants, animals, humans, etc.). Beyond this, there is a complete lack information on how Micron intends to reduce greenhouse gas emissions.

Issues that Micron must address, on behalf of the affected community:

- Transparency and details on the types of chemicals used in the microchip production process, as well as how they intend to enforce environmental monitoring and due diligence to not contaminate nearby communities and surface waters with these harmful substances.

- Where are the proposed alternative locations for this project? It is a borderline essential for developers to provide alternative location considerations for proposed projects in their impact assessments, and the pros and cons of said location considerations. Knowing that wetland restoration in other areas is not nearly as beneficial or biodiverse as the wetlands that would be altered for this project, and the current DEIS is not sufficient in a disappointing plethora of ways, what other options have been considered?

To those at Micron or associated with the Semiconductor Manufacturing Project that currently reside in the area or intend to reside here in the future: are you satisfied with the efforts to mitigate harm to humans and the surrounding natural world that are outlined by this DEIS? Would you allow your children to play, live, and drink water in the surrounding areas of the Micron project, knowing that they have not considered any cumulative environmental impacts on communities? Do you intend to live downstream of this facility and its hazardous waste? Do you think that this project's contribution to climate change is a "global and regional issue," and therefore not a relevant local environmental justice issue to address in their DEIS? Do you feel safe knowing that most of the air pollution monitoring data for this DEIS comes from monitors more than 70 miles away from the project site?

From someone who has had to read multiple environmental impacts statements for school, I want you to know that this DEIS is heinously insufficient in addressing impacts of the environment and the surrounding community/individuals that will be subject to the effects of this project for years to come. I am not just a bleeding heart activist who does not understand the realities of the perceived benefits of domestic microchip production or economic growth of the area; I am a scientist and well-read member of this community who took the time to parse through this DEIS only to find that it does not address a multiplicity of concerns and issues surrounding the project as it stands. Moreover, to only allow 45 days for public comment on such a large document detailing one of the biggest construction projects in NYS history is deeply inconsiderate and downright disrespectful to the community that you seek to change forever through this project. If Micron is set on altering our community and cherished ecosystems, I implore them to show more dignified behavior and values moving forward.

Many thanks for your time and consideration,

Katie Purcell

From: Maurice R Brown <Maurice.r.brown@gmail.com>
Sent: Sunday, August 10, 2025 3:26 PM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Public Comment for Micron DEIS: Urgent Need to Address Housing Locally

Dear Micron DEIS Review Team,

I am writing as a resident of Syracuse to express concern that the Draft Environmental Impact Statement does not meaningfully address housing. Saying “the state will solve it” is not enough. The local housing shortage is already serious, and without concrete commitments, this project could make it worse.

The final EIS should:

Include specific local housing mitigation measures such as funding for affordable housing, rehabilitation programs, and tenant protections.

Provide clear timelines and funding sources for any state involvement.

Commit to working with county and municipal housing agencies to ensure timely implementation.

Housing is central to community stability, economic health, and equity. It should be treated as a core part of mitigation, not left to future state action. I urge you to address it directly in the final plan.

Maurice Brown, Syracuse

From: Christy Dannible <copydiva58@gmail.com>
Sent: Sunday, August 10, 2025 9:30 PM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Micron Project

My name is Christy Dannible. I reside at 5108 Old Barn Rd, Clay, NY 13041. I have lived at this address for the last 16 years.

I am writing you today why the Micron Plant should NOT be allowed in the Town of Clay.

First, it will destroy our Wetlands. Micron's proposed chipmaking plant involves the destruction of hundreds of acres of wetlands that we will never be able to replace. There are endangered species such as the Indiana bat and the Northern long-eared bat; as well as high-priority species in need of the greatest conservation needs: the Eastern Meadowlark, Brown Thrasher and the Bobolink that will continue to decline due to the loss of their habitats. There are many more listed as near-threatened due to major losses. The U.S. Fish and Wildlife Service criticized Micron for not presenting alternative site plans that would avoid some of the wetlands and highlighted the project's impact on aquatic habitats, as well.

Have we not learned from Onondaga Lake? We do not need anymore air or water pollution in this City, especially NOT in the two most-populated towns in Syracuse! We will never be able to rebuild our much-needed wetlands!

Second, the use of harmful chemicals in the middle of Suburba is just asking for more cancers and other disorders for the residents and animal life in this area. I already have acute myloed leukemia. I have been through chemo, radiation and a bone marrow transplant. I have rebuilt my home to be my forever home. Safe. Nontoxic. Now, I run the risk of living on top of smelly ponds and suffering possible other health problems due to my proximity to the plant.

Syracuse already has the highest rate of thyroid cancer due to Allied Chemical dumping in Onondaga Lake.

Semiconductor manufacturing processes rely on chemicals such as fluorinated gases (like NF3 with 17,000 times the global warming potential of CO2), wet chemicals, and PFAS ("forever chemicals"). PFAS chemicals can accumulate in the environment and are toxic, posing potential health risks. I am

extremely concerned about the discharge of unidentified or unknown toxins in unspecified quantities seeping into our groundwater supply.

I have friends that live next to the Micron Plant in Manassas, Virginia, and they say the air smells; there are people complaining of sore throats, migraines and a host of other problems. Most of the complaints have been settled out of court, but that plant has negatively impacted that area. I do not want that to happen to our beautiful town. Pollute it and this area will end up just like THE LORAX.

Lastly, a company of this magnitude does not belong in two of the most-populated towns in Syracuse. We already have a ridiculously high traffic volume due to the number of residents and the rerouting of I-81. It already takes close to an hour to run the gauntlets of Routes 31 and 11 in what used to be minutes. This area does not need a higher volume of traffic congesting the area.

There are many reasons the Micron Plant does not belong in this area. I sincerely hope some of these reasons resonate with the powers that be.

Sincerely,
Christy Dannible

From: [Echo Duva-Sprague](#)

Mail received time: Sun, 10 Aug 2025 21:00:30

Sent: Sunday, August 10, 2025 5:00:31 PM

To: [chipsnepa](#)

Subject: [EXTERNAL] Public comment

Importance: Normal

Sensitivity: None

Archived: Thursday, August 14, 2025 12:35:09 PM

My public comment submission:

Micron says this project will have “no environmental justice impacts,” but they haven’t shown how they reached that conclusion. They looked at too small an area, didn’t consistently consider disadvantaged or low-income communities, and left out many connected impacts like new roads, rail lines, utilities, and all the extra development this project will bring. They have only held two small public meetings, and there’s no plan to share ongoing environmental monitoring or include community voices in decisions over the next 16 years.

Big questions remain about PFAS pollution, wetland impacts, stormwater, air quality, and climate change, all of this affects our communities completely. This also affects our wildlife, wetlands, and the natural areas many of us depend on for clean water, flood protection, and habitat.

This review needs to be expanded, made transparent, and include real community oversight before the project moves forward.

Micron falls short of including the local community in the full project and impacts. It is just another example of how big business takes advantage of a community, and leaves wreckage in its wake. The transparency is lacking for a reason and it isn’t to the benefit of its neighbors.

Echo Duva-Sprague
Clay, NY

From: tuckerchai@twcny.rr.com
Sent: Sunday, August 10, 2025 9:12 PM
To: 'chipsnepa@chips.gov'
Subject: [EXTERNAL] comment on Micron Draft EIS

To Whom It May Concern:

Commitments made in support of the Draft Environmental Impact Statement should be reflected in enforceable conditions in subsequent permits (unless more stringent permit conditions are deemed necessary).

For example, BMPs for GHGs and Climate Change, identified in Table 3.7-14, should become enforceable permit conditions, unless more stringent conditions are deemed necessary.

Regards

Tom Elter
1384 Ridge Road
Fabius, NY 13063

From: John Felleman <jfelleman@gmail.com>
Sent: Sunday, August 10, 2025 11:56 AM
To: Chipsnepa@chips.gov
Cc: John Felleman; Don Hughes
Subject: [EXTERNAL] Comments on Micron Clay NY DEIS
Attachments: JFelleman-PFAS DEIS Commnets.docx

Attached please find Policy and Management comments on the DEIS focusing PFAS and hazardous materials. The comments complement the science comments submitted by The Sierra Club Micron New York, pp. 8-22.

John Felleman, D.P.A., P.E.
Professor Emeritus SUNY-ESF
124 Circle Rd Syracuse NY 13210

MICRON DEIS PFAS POLICY and MANAGEMENT COMMENTS

John Felleman, D.P.A., P.E.

Professor Emeritus SUNY-ESF

124 Circle Rd., Syracuse NY 13210

August 2025

HISTORY

The EPA's engagement of PFAS pollution started with the litigation of 3M corporation in 1999. By the start of the Clay Micron project the EPA had established a nation-wide comprehensive, science-based approach to understanding the diversity of pfas chemicals, their distribution, potential toxicity, and monitoring program. This served as the basis for Regulations, and treatment. The EPA had a growing Office of Research and Development. ORD did lab science, funded PFAS research at major universities, worked with States and industry, and promulgated initial drinking water standards. It also generated initial lists of PFAS chemicals to be monitored. . In response to the increasing importance of this expanding human and ecological health arena, the EPA generated the policy document: **PFAS Strategic Roadmap** (<https://www.epa.gov/pfas/pfas-strategic-roadmap-epas-commitments-action-2021-2024>).

One Roadmap goal was "cradle to grave" PFAS management. A Roadmap's key strategic guidance documents strongly encourages State agencies, which issue Federal/State water and air discharge permits, to place pfas monitoring requirements on the permits. This proactively can generate in-situ knowledge, and enhance public transparency.

Generalizing, the extensive discussion of PFAS in the DEIS, amounts to Micron stating it will conform to Federal and State regulations. This includes transit, and worker safety. In the spring of 2025 the Federal government cancelled all research university PFAS contracts. Also in the spring, EPA had a major staff reduction. A second one followed. In the new Federal budget, the EPA ORD has been eliminated. There will be no new Federal PFAS regulation or guidelines of Micron for the foreseeable future. The current DEIS covers the full 4 Fab build-out. Phases 3 and 4 may require a supplemental EIS process, probably an "Environmental Assessment". NEPA itself is undergoing major transformations. "Climate change", and "environmental justice" have been removed" as impact categories. Individual Federal EIS Lead Agencies have been ordered to rewrite their own NEPA Regulations.

As per the 10th Amendment to the Constitution, states are responsible for the public health safety and welfare. NY will need to establish strong PFAS sharing relationships with like-minded states and countries.

How is NY State Doing with this Brand New Major Responsibility?

Chip Fabs make different chip, use different PFAS, and are located in unique geo/social settings.

SEQR Regulations

Most States don't have an EIS Law. In those that do some apply only to major actions by state agencies, such as a highway. NY SEQR Regs are pretty simple because they apply to projects ranging from a small local shopping mall to Micron. There is however a unique subsection of the regulations.

6NYCRR SEQR

Sec 619.7 Preparation and Contents

(b) Contents

- (6) In addition to the analysis of significant adverse impacts required in subparagraph (b)(5)(iii) of this section, if information about reasonably foreseeable catastrophic impacts to the environment is unavailable because the cost to obtain it is exorbitant, or the means to obtain it are unknown, or there is uncertainty about its validity, and such information is essential to an agency's SEQR findings, the EIS must:

617.9 – 617.10

- (i) identify the nature and relevance of unavailable or uncertain information;
- (ii) provide a summary of existing credible scientific evidence, if available; and
- (iii) assess the likelihood of occurrence, even if the probability of occurrence is low, and the consequences of the potential impact, using theoretical approaches or research methods generally accepted in the scientific community.

This analysis would likely occur in the review of such actions as an oil supertanker port, a liquid propane gas/liquid natural gas facility, or the siting of a hazardous waste treatment facility. It does not apply in the review of such actions as shopping malls, residential subdivisions or office facilities.

All of this **except (iii)** applies to MICRON PFAS.

There are no current Federal or NYS regulations on Emissions from Chip fabs. We don't have, and may never have, enough long term human/ecological morbidity/mortality knowledge to regulate individual chip fab generated PFAS emissions.

In the last few years, NYS has substantially engaged statewide PFAS issues. It has public drinking water standards. It has banned materials ranging from clothing to airport de-icing sprays that are known toxins. SUNY ESF is monitoring statewide sewage sludge chemicals, that if applied to farms, may pollute crops and groundwater.

However, Chip Fabs are few and individually unique.

What NY State needs is a DEC and DOH required holistic approach to long term management of its new fabs. Here are some "comments" that are not addressed in the MICRON DEIS

Water and Air need to be co-monitored and co- managed as State-County -Corporate partnership for a defined dynamic PFAS Geo/Social Shed.

Monitoring requires “baselines” to analyze change. Micron PFAS will be discharged from the new sewage plant. There is and will be Biological accumulation in fish downstream. There’s nothing in the DEIS on this.

This raises related questions: what are the pre-operational Micron baselines? Some Pfas chemically change in the environment. What chemicals are in the new County water pipeline from Lake Ontario? upstream of the new County STP; is it monitored at micron input to the new STP?, are Micron specific pfas monitored in the County STP sludge, and in the river downstream?

There appears to be in the DEIS no substantive analysis in the DEIS of coordination between State and County agencies. There are no statements by DEC on monitoring requirements on water or air permits

The recently deleted EPA ORD generated short lists of which pfas chemicals to be monitored for large scale different priority contexts. They had tested the monitoring technology. There is no such list of Chip Fab pfas because they are quite unique, and some are manufacturing trade secret confidentiality. The latter need to be monitored using emerging to organized PFAS subgroups.

To flourish, the fabs continually evolve. Even Micron which which makes memory chips, not hugely complex AI chips. There will be new pfas or equivalent process chemicals, and new approaches the capture and treatment of pfas and other problematic chemicals.. It is important that Micron and the state and county have articulated, effective communications.

From: Glenn Griffin <griffinglenn77@gmail.com>
Sent: Sunday, August 10, 2025 5:02 AM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Comments on Micron DEIS

Micron must build the chips plant to LEED Platinum environmental standards. Micron must run the plant on 100% renewable energy. There must be a coherent plan set in place on how to decontaminate and deconstruct the chips plant when Micron decides to leave Clay or plant becomes obsolete. Micron must consult with CENTRO to enable adequate public transit access for all workers of the chips plant. Bus passes should be provided to all workers at the chips plant as part of benefits package. Employees at the chips plant should be given Micron stock options as benefits. Please build the chip plant to the north of Route 31 to protect the beloved Meltzer Park of Clay. All Micron workers and anybody else working at the chips plant such as janitors or cafeteria servers should be given full healthcare benefits and paid a living wage. Everybody who works at the Micron plant even as janitors or food servers should be allowed to form or join unions. Micron should repay all the subsidies given to build the plant IF the plant gets shut or closes down prematurely within only a few years of operation. Micron must collaborate and give training to local cleanup crews and firefighters on how to eliminate any industrial accidents at the chips plant. Any plants or shrubs planted as landscaping at the chip plant must be indigenous to Onondaga County.

From: Shirley Griffin <shirleygriffinmail@gmail.com>
Sent: Sunday, August 10, 2025 6:55 AM
To: chipsnepa@chips.gov
Subject: [EXTERNAL] Micron DEIS must do more to protect the ecosystem of Onondaga County

Micron should both create and allow an independent citizen review board to monitor all chemical spills and water pollution. There must be an alert system in place in case of industrial accidents at the chip plant. There must also be greater collaboration with transportation department of NY State to make sure that there will be no traffic congestion from all the vehicles both during construction and from future plant workers. Improve the road between Maple drive and Route 81 to accommodate all future traffic from the plant workers and folks doing the construction work. Please improve the sewage infrastructure to handle the hazardous chemicals and increased population after the plant is finished. Meltzer Park should be protected from being demolished by the chips plant. There must be public disclosure about how many kinds of chemicals will be stored at the plant and how much of the chemicals will be stored. All residents and plant workers must be taught how to survive any potential future chemical spills and environmental accidents. Public schools must be given proper equipment to protect students during any future chemical contamination from the chips plant. There should be a preference to hire local Onondaga residents for any and all future chip plant workers. Local Onondaga residents should be given preference for hiring as construction workers. Micron must refrain from bringing in any H1B Visa holders to work at the chip plant because Onondaga County already has a high unemployment rate. Healthy food should be sold at the canteen. No unhealthy foods should be sold onsite at the chip plant. The chip plant must have a strict anti-bullying policy for employees. There should be anti-harassment training for employees and construction workers of the chip plant. Any construction workers who catcall people near the chip plant must be blacklisted from both the worksite and all other Onondaga County construction projects.

From: Karen Haas <info@sterlingwaterstewards.org>
Sent: Sunday, August 10, 2025 2:06 PM
To: chipsnepa@chips.gov
Cc: Jon Fox; 'Dan Larson'; 'Joanne Piersma'
Subject: [EXTERNAL] Micron DEIS Comments from Sterling Water Stewards
Attachments: Micron DEIS 3.2 & 3.3 Review_FoxPG Final Report.pdf

Sterling Water Stewards hereby submits our organization's comments on the Micron Draft Environmental impact Statement, ***in the form of the attached report and recommendations from our consulting professional geologist about the karstic conditions at the Micron site.***

Karstic conditions exacerbate the risk of groundwater, surface water, and /or drinking water contamination in the event of hazardous material incidents, equipment failures, or poorly managed industrial wastewater treatment.

Micron's DEIS is deficient in detail concerning the specific chemicals to be used at the site; quantities to be used; the methodology that will be used to remove harmful chemical substances from wastewater; and how discharges will be monitored.

To allow a commercial enterprise like Micron to dump unidentified or unknown toxins in unspecified quantities with unproven and underdeveloped treatment technologies into our groundwater supply is a serious abdication of governmental responsibilities.

Karen Haas, President
Sterling Water Stewards
www.sterlingwaterstewards.org



Fox Professional Geology, PLLC

Sterling Water Stewards

***Final Report
Review of Draft Environmental Impact Statement***

**Micron Semiconductor Manufacturing Project
Towns of Clay and Cicero, Onondaga County, New York**

August 2025

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CERTIFICATION

The opinions, conclusions, and recommendations contained in this report are based on currently available data and information and are subject to modification if additional data and/or information become available.

It is a violation of the New York State Education Law for any person, unless he or she is acting under the direction of a Licensed Professional Geologist or Professional Engineer, to alter this report or its drawings, figures, tables, and/or attachments in any way. This report was prepared for the Sterling Water Stewards specific to the review of the Draft Environmental Impact Statement for the proposed Micron Semiconductor Manufacturing Project in the Towns of Clay and Cicero, Onondaga County, New York for application to this Site and this project only.



Jon S. Fox, P.G.
Owner/Principal Geologist
Fox Professional Geology, PLLC

Date: 4 August 2025



Sterling Water Stewards

Review of Micron Draft Environmental Impact Statement

FoxPG Project Number STE-004R1

August 2025

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EXECUTIVE SUMMARY

Based on currently available geologic data and information, initiation of construction activities such as the excavation and removal of soil or bedrock at the Site is not recommended at this time based on the documented occurrence of soluble bedrock with evidence of dissolution and highly variable subsurface conditions at the Site that could lead to fast, turbulent subsurface water flow and further dissolution of soluble bedrock. These surface and subsurface conditions are consistent with karst geology/features and can pose significant risks to human health, built structures, water quality, and the environment through the formation of unwanted and damaging land subsidence, flooding, slope movements, and/or contaminant migration. The Draft Environmental Impact Statement (EIS) fails to acknowledge the presence of karst-like conditions at the Site and is therefore insufficient to assess the impacts of highly variable subsurface conditions on site preparation and development. Focused areas of groundwater recharge need to be identified to help prevent contamination from sources on or adjacent to karst features and to avoid or minimize natural and human-induced geologic hazards and impacts in areas of soluble bedrock such as land subsidence, flooding, and slope movement. The review uncovered significant data and information gaps regarding the Site's geology, soils, topography, and water resources, including but not limited to recent nearby use of a productive bedrock aquifer for local water supply. Additional investigation and characterization of the Site's geology, hydrology, and local groundwater use are required to inform the public and to assist owners, operators, design professionals, plan reviewers, public works officials, and jurisdictional regulators in making informed decisions on Site development and management. Recommendations are provided in response to existing data and information gaps and to address the key findings and conclusions contained in this report.

PROJECT BACKGROUND

The United States Department of Commerce's Creating Helpful Incentives to Produce Semiconductors (CHIPS) Program Office (CPO) and the Onondaga County Industrial Development Agency (OCIDA) are joint lead agencies under the New York State Environmental Quality Review Act (SEQR) for the proposed Micron semiconductor manufacturing project. The proposed project and some of its connected actions are located in the Towns of Clay and Cicero, Onondaga County, New York (the Site). Figure 1 (Attachment A) shows the location and layout of the proposed Micron Campus and surrounding areas. Micron proposes to construct four semiconductor fabrication facilities on the proposed Micron Campus portion of the Site over a period of approximately 16 years.

SEQR requires all local, regional, and state government agencies to equally examine the environmental impacts along with the social and economic considerations for a certain project, or action, during their discretionary review (NYSDEC, 2025a). Agencies must follow the multi-step SEQR Decision Process, which requires them to assess the environmental significance of all actions they have the power to approve, fund, or directly assume. If an action consists of multiple phases, sets of activities, or if separate agencies are involved, SEQR requires agencies to jointly consider these cumulative impacts during their review. The Draft EIS for the Site dated June 2025 (CPO & OCIDA, 2025) was prepared by CPO and OCIDA to consider these cumulative impacts.

The Sterling Water Stewards requested that FoxPG review relevant portions of the Draft EIS regarding geologic conditions at the Site and provide key findings and recommendations to inform the public and to assist owners, operators, design professionals, plan reviewers, public works

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officials, and jurisdictional regulators in making informed decisions on Site development and management.

METHODS

Data and information contained in the Draft EIS (CPO & OCIDA, 2025), as well as data and information from other relevant scientific and technical sources indicated in the sections below, were reviewed by FoxPG to evaluate the Site and areal geologic and environmental conditions that may be relevant to the protection of human health, built structures, water quality, and the environment. FoxPG's review focuses on the proposed Micron Campus and Rail Spur portions of the Site, where the vast majority of chemicals and other potential contaminants will be stored and used at the Site. This is a critical area because the frequent transfer and storage of chemicals and waste in high traffic areas greatly increases the possibility of spills and uncontrolled releases to the environment.

Selected data and information from the review are summarized into various figures, tables, and attachments. Figures referenced in this report are presented in Attachment A. Tables referenced in this report are presented in Attachment B. Acronyms and abbreviations contained in this report are listed in Attachment C. Scientific, technical, or other references cited in this report are listed in Attachment D.

RESULTS

Salient results of the review are organized below by physical setting, soil/glacial deposits, bedrock, hydrology and water resources, and potential contaminants and contaminant migration.

Physical Setting

Figure 1 (Attachment A) shows the location, layout, and reported land use for parcels at the proposed Micron Campus and surrounding areas.

A review of topographic contours shown in Figure 2 (Attachment A) shows that the overall land surface in the vicinity of the proposed Micron Campus and surrounding areas slopes generally towards the intermittent streambed of Youngs Creek. Topographic contours at the proposed Rail Spur Site show that the overall land surface in that portion of the Site is relatively flat (Attachment A, Figure 3).

The 10-foot contour interval used in topographic maps presented in Section 3.2 of the Draft EIS is inadequate to identify topographic features with less than 10 feet of relief. Field experience has shown that many topographic features associated with the dissolution of soluble bedrock (i.e., karst) in central New York have less than 10 feet of topographic relief. Karst is a landscape formed by the dissolution of soluble bedrock and is characterized by a variety of distinctive features including solution-enlarged fractures, rock pinnacles, closed topographic depressions, sinking streams, and others, and also by the dominance of subsurface drainage over surface drainage (Veni, 1999; Palmer, 2007; Taylor and Greene, 2008; Gutierrez et al., 2014). The use of smaller topographic contour intervals (e.g., a 2-foot contour interval) in mapping is better suited for assessments of potential karst areas in central New York, particularly in relatively flat areas.

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Figures 2 and 3 (Attachment A) also show areas of steeper slopes at the Site, which are indicated by brighter shades of red. Close examination of these two figures show numerous locations with generally circular or elliptical areas of connected (closed) steeper slopes. Some (possibly many) of these areas likely represent closed circular or elliptical topographic depressions, which are a common, distinctive landform that occurs in areas of karst geology and hydrology (Veni, 1999; Palmer, 2007; Taylor and Greene, 2008; Gutierrez et al., 2014; Kappel et al., 2020; ASTM, 2023).

Figure 4 (Attachment A) also shows topographic contours in the vicinity of the proposed Micron Campus and surrounding areas published by the New York State Department of Transportation (NYSDOT, 1989). Review of Figure 4 shows many water-filled closed topographic depressions on and near the proposed Micron Campus. Water-filled closed topographic depressions are a common landform that occurs in areas of karst geology and hydrology (Veni, 1999; Palmer, 2007; Taylor and Greene, 2008; Gutierrez et al., 2014; Kappel et al., 2020; ASTM, 2023).

Figure 5 (Attachment A) shows geological hazard areas in Onondaga County as determined by the Syracuse-Onondaga County Planning Agency and the Onondaga County Department of Emergency Management (SOCPA-OCDEM, 2019). Review of Figure 5 indicates that the proposed Micron Campus is located fully within a geological hazard area consisting of dolostone (dolomite) bedrock. Dolostone bedrock is a soluble carbonate rock that is susceptible to dissolution and the resulting formation of karst features such as solution-enlarged fractures and sinkholes, and the associated hazards of land subsidence, floods, and slope movements (Veni, 1999; Palmer, 2007; Taylor and Greene, 2008; Gutierrez et al., 2014; SOCPA-OCDEM, 2019; Kappel et al., 2020; ASTM, 2023).

Soil/ Glacial Deposits

The thickness of soil and glacial deposits in portions of the proposed Micron Campus that have been investigated to date is illustrated in Figure 6 (Attachment A). Reported thickness varies from 4.0 to 33.5 feet. Section 3.2.2.1 and Section 3.2.2.2 of the Draft EIS (CPO & OCIDA, 2025) describe soil and glacial deposits present at the Site and indicate that most of the soil types are consistent with soils typically found in an area of glacial deposition and erosion (i.e., previous ice ages). The predominant soil types are silt loams, including Niagara, Rhinebeck, and Collamer silt loams. Glacial deposits encountered at the Site are highly variable and consist predominantly of glacial till, glaciolacustrine silt and clay, and glacial sand as demonstrated by soil boring logs and other data from several phases of geotechnical investigations performed at the Site (Draft EIS Appendix E-4). Soil and glacial deposits at the Site consisting predominantly of glacial till or glaciolacustrine silt and clay are relatively impermeable (i.e., do not readily transmit water) as demonstrated by their typically wet to saturated moisture content. The Draft EIS states that many of these soil and glacial deposits (particularly the finer-grained and wetter deposits) are unsuitable for proposed Site construction activities and will therefore need to be removed and replaced with more suitable imported fill materials (e.g., coarse-grained, relatively permeable fill materials such as sand and gravel). Specifically, Section 3.2.3.2 of the Draft EIS indicates that an estimated 1.5 million cubic yards of native soil and glacial deposits at the Site will be removed during construction of the proposed Micron Campus. Therefore, Micron is proposing to remove a very large volume of relatively impermeable soil and replace it with more permeable fill materials, which will increase infiltration into the subsurface and likely exacerbate the dissolution of soluble bedrock and the formation and development of karst features. Additionally, removal of significant amounts of soil or other cover over karst features may also accelerate or trigger the development of sinkholes or other karst features through a variety of processes (see Table 1 in Gutierrez et al., 2014).

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Soil and glacial deposits can obscure karst features in the landscape and thus result in a geologic condition known as “covered” or “mantled” karst (Palmer et al., 1991; Rubin, 2009; Gutierrez et al., 2014; ASTM, 2023). One form of glacial deposition of sediments typically involves the high-pressure smearing of sediments beneath the weight of overlying glacial ice into pre-existing voids and conduits in the land surface, including karst voids and conduits. Glacial processes have a high probability of generating covered or mantled karst conditions, particularly when glacial sediment is fine-grained (which occurs at the Site). Areas of covered or mantled karst often have no obvious karst features visible at the surface (Gutierrez et al., 2014). Therefore, the statement in Section 3.2.2.1 of the Draft EIS that karst topography was not noted at the Site does not eliminate the presence of karst conditions at, beneath, or near the proposed limits of disturbance at the Site. Additionally, as noted above in the section entitled “Physical Setting”, evidence of closed topographic depressions has been demonstrated at the Site (see Attachment A, Figure 5) and is also suggested in many portions of the Site by slope data presented in the Draft EIS (see Attachment A, Figures 2 and 3 of this report).

Bedrock

Bedrock beneath the proposed Micron Campus is mapped by the New York State Geological Survey (NYSGS) as the Upper Silurian Lockport Group, which in central New York consists predominantly of gray to black dolostone and limestone with lesser amounts of calcareous or dolomitic shale (Rickard and Fisher, 1970). Dolostone and limestone are carbonate rocks which are susceptible to the formation of karst features (Veni, 1999; Palmer, 2007; Taylor and Greene, 2008; Gutierrez et al., 2014; SOCPA-OCDEM, 2019; Kappel et al., 2020). Dolomitic and calcareous shales in New York State are also susceptible to the formation of karst features (Kappel et al., 2020). All of the Lockport Group bedrock formations in central New York are identified in a list of karst aquifers in New York State published by the United States Geological Survey (USGS; Kappel et al., 2020). While the Lockport Group may be less likely to develop karst features than some other karst formations in New York, development of some karst features, including sinkholes, has been documented in the Lockport Group, typically along bedding planes near the bedrock surface (Kappel et al., 2020).

Another bedrock formation that is present in the vicinity of the Site and its connected actions in Onondaga County is the Upper Silurian Vernon Formation (Ailing, 1928; Rickard, 1969; Rickard and Fisher, 1970; Treesh and Friedman, 1974; Kappel et al., 2020; Fox et al., 2022). The Vernon Formation consists predominantly of red to green dolomitic detrital mudstone with localized zones of evaporite minerals such as gypsum, anhydrite, and halite (Rickard, 1969; Fox et al., 2022) and is also prone to the development of karst features and land surface subsidence in central New York, primarily due to the dissolution of gypsum (Kappel et al., 2020). The Vernon Formation is also identified in the list of karst aquifers published by the USGS (Kappel et al., 2020).

The structural attitude of the sedimentary bedrock in central New York consists predominantly of sub-horizontal bedding that strikes generally east-west and dips gently (typically one degree or less) towards the south (Rickard, 1969; Kappel et al., 2020). Several sets of regional joints or fractures occur in area bedrock with predominant structural trends striking generally northwest (Zhao and Jacobi, 1997) and generally east-northeast (Engelder, 1982). These regional joint and fracture sets commonly act as preferential pathways for water migration and the development of solution-enlarged joints and fractures in soluble carbonate or evaporite bedrock formations, such as those that occur at and near the Site.

Several areas in Figure 6 (Attachment A) show bedrock encountered at shallow depths (light-colored circles) very close to bedrock encountered at greater depths (dark-colored circles). Variable depth to

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bedrock is a common condition in areas of karst geology and may indicate a zone of epikarst. Epikarst is a concentrated area of dissolution features and enhanced porosity and permeability that typically occurs in the upper portions of carbonate or evaporite bedrock in karst areas, and the epikarst typically contains significant amounts of stored water (Veni, 1999; Palmer, 2007; Taylor and Greene, 2008; Gutierrez et al., 2014).

Among other data, Appendix E-4 of the Micron Draft EIS contains photographs and data in boring logs from 81 bedrock core runs collected at 45 boring locations by geotechnical consultants during three phases of geotechnical investigation at the Site. One core run is five feet in length. Examples of representative bedrock cores collected at the Site, including the various geologic textures, compositions, and other geological parameters, are presented in Figures 07 through 11 (Attachment A). Selected data from these bedrock cores and their associated boring logs are summarized in Table 01 and Table 02 (Attachment B). Review of available data results in the following salient observations with respect to features associated with the dissolution of soluble bedrock.

1. Numerous fractured or broken areas contain weathering that is consistent with dissolution and solution enlargement (i.e., karst features).
2. Rock quality designation (RQD) data indicates that bedrock quality at the Site ranges the full spectrum from “very poor” to “excellent” according to the ASTM International (ASTM) Standard D6032/D6032M entitled “Standard Test Method for Determining Rock Quality Designation of Rock Core” (ASTM, 2017). RQD data have been widely used as a warning indicator of low-quality rock zones that need greater scrutiny and require additional investigation (ASTM, 2017). Rock cores with “poor” to “very poor” RQD commonly correspond to intervals with a higher degree of weathering consistent with karst dissolution and solution enlargement. Therefore, geologic features consistent with karst features are present at the Site in several areas proposed for construction of fabrication facilities and associated infrastructure, including areas relevant to the potential for contamination issues such as proposed chemical or waste storage tanks and other structures.
3. A possible void with a minimum diameter of at least 1.9 feet may have been encountered at location B-129.
4. Drilling water was lost to the bedrock formation in three rock core runs from two boreholes (B-217 and B-292), indicating the localized presence of subsurface voids or conduits with the ability to transmit significant amounts of water (or other fluids) at a very rapid rate. These observations are consistent with and may represent karst voids or conduits.
5. Unconsolidated silt or clay deposits (referred to as “seams” in boring log descriptions) were reported in 15 of 81 bedrock core runs. These silt or clay seams are consistent with and may represent sediment transported by turbulent subsurface water flow within solution-enlarged bedrock conduits (i.e., karst bedrock conduits).

Please refer to Table 01 and Table 02 (Attachment B) for additional information, including the designations of other borings with evidence of one or more of the features referenced above that are consistent with the dissolution of soluble bedrock.

Hydrology and Water Resources

Onondaga County has a temperate, humid continental climate. Onondaga County averaged 39.4 inches of precipitation annually for the period from 1895 through 2024 (NOAA, 2025). Section 3.3.3.2 of the Draft EIS indicates that 98.6 percent of the streams within the proposed Micron Campus were classified as intermittent (water present only during wet portions of the year) or ephemeral (water present only immediately after a precipitation event). In a humid area with high

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precipitation, the lack of persistent, permanent streams at the proposed Micron Campus demonstrates significant vertical water infiltration downwards into the subsurface (i.e., sinking or losing streams) and the dominance of subsurface drainage. In addition to the presence of distinctive features typically associated with karst, the dominance of subsurface drainage is a primary characteristic of an area with karst geology and hydrology (Veni, 1999; Palmer, 2007; Taylor and Greene, 2008; Gutierrez et al., 2014). Wetlands present at the Site may occur predominantly in areas where fine-grained soil and/or fine-grained underlying glacial deposits slow/limit infiltration of water from precipitation into the subsurface.

Section 3.3.3.4 of the Draft EIS indicates that the depth to groundwater at the Site ranges from 0.1 to 7.8 feet below the ground surface in the western portion of the proposed Micron Campus. The shallow depth to groundwater at the Site indicates it is extremely likely that there is significant interaction between surface water and groundwater at the Site. This section of the Draft EIS also indicates that a total of 42 monitoring wells were installed at the Site through January 2025. However, a map showing the location of all monitoring wells is not provided, and boring logs and monitoring well completion records for wells installed after the three rounds of geotechnical investigation also are not provided in Section 3.2, Section 3.3, Appendix F, and Appendix E of the Draft EIS. Additionally, the Draft EIS does not present groundwater contour maps, groundwater potentiometric maps, geologic cross sections, bedrock surface contour maps, or similar maps and data (for both overburden groundwater and bedrock groundwater) that are typically prepared and presented in an evaluation of groundwater flow and surface water and groundwater interaction. Therefore, surface water and groundwater interaction within the Water Resources Study Area has not been evaluated and/or has not been presented nor discussed in the Draft EIS at a level commensurate with the complex geology and hydrogeology of the Site. Figure 12 (Attachment A) presents schematic cross sections showing some typical scenarios of surface water and groundwater interaction in karst areas. Characterization of surface water and groundwater interaction is required for an understanding of potential risks and measures that may be necessary to mitigate these risks to human health, built structures, water resources, and the environment that are commonly encountered in areas of soluble bedrock (Gutierrez et al., 2014; ASTM, 2023).

As initially described above in the section of this report entitled "Bedrock", epikarst is a concentrated area of dissolution features and enhanced porosity and permeability that typically occurs in upper portions of soluble carbonate or evaporite bedrock. The epikarst typically contains significant amounts of stored water and is therefore highly relevant to the hydrology, hydrogeology, and protection of water resources in a karst area such as the Site. As stated above in the section entitled "Soil/Glacial Deposits", very large volumes of soil, glacial deposits, and bedrock are proposed for removal during construction activities at the Site (see Section 3.2.3.2 of CPO & OCIDA, 2025). Figure 13 of this report (Attachment A) shows proposed locations for bedrock removal at the proposed Micron Campus. Because the epikarst typically occurs in the upper portions of soluble bedrock, it is likely that the proposed removal of bedrock at the Site may remove all or a significant portion of the epikarst zone beneath portions of the Micron Campus. Removal of epikarst without further characterization and appropriate engineering measures to address subsurface water flow may have significant impacts on subsurface water flow at the Site and could cause or exacerbate flooding, particularly because the Lockport Group bedrock aquifer system is generally present at shallow depths in epikarst and bedding-plane structures in bedrock (Kappel et al., 2020). Bedding-plane structures in bedrock have been documented at the Site (see Attachment A, Figures 07 through 10, and Attachment B, Tables 01 and 02 of this report). Therefore, the presence and extent of epikarst at the Site should be evaluated prior to the initiation of any excavation for the removal of soil, glacial deposits, and/or bedrock at the Site in order to avoid, minimize, and/or better identify and manage potential hydrology/hydrogeology impacts such as flooding and contaminant migration.

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The assessment provided in Section 3.3.3.4 of the Draft EIS references water supply wells from the NYSDEC's DECinfo Locator website. Water well information posted on this website is typically based on water well completion records submitted to NYSDEC by registered water well drillers as required in Section 15-1525 of New York State's Environmental Conservation Law. Review of the DECinfo Locator website indicates many of the water wells shown on the DECinfo Locator website as being within or near the proposed Micron Campus are actually located in Oswego County based on information provided in the corresponding well completion reports. Additionally, the assessment provided in the Draft EIS does not include private water supply wells that were installed prior to April 2000. This date is when NYSDEC began its current requirement for registered water well drillers to submit water well completion reports to NYSDEC. It is likely that many private water supply wells in this area were installed prior to April 2000 given the Town's long history of residential development dating back to 1791 (Town of Clay, 2025) and the fact that municipal water was not available in the vicinity of the Site until the late 1960s at the earliest (OCWA, 2025). Therefore, the owners of (and data from) many of the private water supply wells located within the Water Resources Study Area have not been considered and incorporated into the Draft EIS because the Draft EIS currently considers only private water supply wells that were installed during or after April 2000.

Review of a NYSDEC water well completion report presented in Figure 14 (Attachment A) indicates that a private water supply well designated as well OD2031 was installed in 2008 and produces groundwater from black limestone bedrock (NYSDEC, 2025b). This bedrock is similar to bedrock located below the proposed semiconductor fabrication facilities as demonstrated by data presented in Appendix E-4 of the Draft EIS (CPO & OCIDA, 2025). This private water supply well is located within approximately 600 feet of the eastern boundary of the proposed Micron Campus and has a high yield (stabilized discharge) of 100 gallons per minute (gpm) of groundwater that is produced from shallow bedrock (the overburden is cased off and the maximum depth of this water supply well is 39 feet below ground surface). High well yields at relatively shallow depths are typical of karst aquifers. The proposed semiconductor fabrication facilities are located directly over a productive bedrock aquifer that has been (and may still be) recently used for local water supply purposes.

A private water well survey is not presented in the Draft EIS. Therefore, the current extent of local usage of this productive bedrock aquifer for water supply in this area has not been evaluated or has not been presented in the Draft EIS.

A portion of the western boundary of the proposed Micron Campus and Rail Spur Site is located approximately 1.0 mile from a confined aquifer located in the western portion of the Water Resources Study Area. Figure F-37 designated "Groundwater Aquifers in Water Resources Study Area" and contained in Appendix F-5 of the Draft EIS, indicates that groundwater beneath portions of the Micron Campus and Rail Spur Site flows toward this aquifer. Potential hydraulic connections between soluble bedrock at the Site and this confined aquifer either have not been evaluated or have not been presented in the Draft EIS.

A portion of the western boundary of the proposed Micron Campus and Rail Spur Site is located approximately 2.9 miles from the Baldwinsville Primary Aquifer as mapped and designated by the USGS and NYSDEC (Pagano et al., 1986). Primary Aquifers are defined in NYSDEC's Division of Water (DOW) Technical and Operational Guidance Series (TOGS) Memorandum 2.1.3 as "highly productive aquifers presently utilized as sources of water supply by major municipal water supply systems" (NYSDEC, 1990). Primary Aquifers are afforded special protection by NYSDEC regulations governing the siting of potential sources of contamination. Figure F-38 from the Draft EIS indicates that groundwater beneath western portions of the Micron Campus and Rail Spur Site flows

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towards this aquifer. Potential hydraulic connections between soluble bedrock at the Site and the Baldwinsville Primary Aquifer either have not been evaluated or have not been presented in the Draft EIS.

Potential Contaminants and Contaminant Migration

Potential contaminants associated with semiconductor manufacturing may include a wide variety of chemicals, compounds, or elements including but not limited to alcohols, ammonia, carbon, cyanides, glycols, halogens, metals/inorganics, nitrogen and its compounds, peroxides, per- and polyfluoroalkyl substances (PFAS), acidity/alkalinity (measured as pH), phosphorous and its compounds, silica, sulfur and its compounds, total dissolved solids (TDS), tetramethylammonium hydroxide (TMAH), total suspended solids (TSS), and toxic organic compounds including volatile organic compounds (VOCs), semivolatile organic compounds (SVOCs), and possibly others (USEPA, 2022; NIST, 2024). While the Draft EIS identifies by name some specific chemicals and products that are planned for use at the Site by Micron, other chemicals and products are identified in numerous sections of the Draft EIS only by generic chemical categories, such as PFAS, metals, oxidizers, corrosives, etc.

Some of the chemicals proposed for use at the Site are widely considered by numerous authorities having jurisdiction as “emerging contaminants”, which are generally substances that are relatively new to our awareness and understanding regarding their presence in the environment, their mobility and persistence in the environment, and/or their potential impacts on human health and the environment. Such chemicals include but are not limited to PFAS, 1-4 dioxane, and TMAH. For example, TMAH, which is widely used in the semiconductor industry in silicon etching, has a high solubility in water, a high affinity to bind to solids, and is toxic and therefore inhibits biological processes relied upon for wastewater treatment and water quality protection (TRA, 2025). There is currently no laboratory analytical method approved by the United States Environmental Protection Agency (USEPA) for analysis of TMAH. Therefore, the industrial discharge of TMAH is prohibited by some wastewater treatment authorities, such as the Trinity River Authority (TRA) in Texas (TRA, 2025). Consideration of the planned use of TMAH or other emerging contaminants at the Site should enhance the ability of authorities having jurisdiction to avoid or minimize impacts to water treatment facilities and therefore facilitate protection of human health, water resources, and the environment.

Even though the discharge of treated industrial wastewater from Micron’s operations will occur under a State Pollutant Discharge Elimination System (SPDES) permit issued by NYSDEC, contaminants from Micron’s fabrication operations will be discharged into the Oneida River under the proposed approach outlined in Section 3.2.1, Section 3.2.3.2, Section 3.3.2, Section 3.3.4.2, and other sections of the Draft EIS. The proposed approach/discharge may add significant contaminant mass into the Oneida River, which would subsequently migrate downstream to surface water and sediment further downstream, including the Oswego River and Lake Ontario.

As outlined above in the sections entitled “Bedrock” and “Hydrology and Water Resources”, depth to bedrock is shallow in some areas (see Attachment A, Figure 6), and excavation into bedrock is proposed in some portions of the Site, particularly beneath the proposed semiconductor fabrication facilities (see Attachment A, Figure 13). There may be little to no soil or imported fill material in some areas between the bottom of the proposed semiconductor fabrication facilities and the top of soluble bedrock with high porosity and permeability. Fill imported to a site for building construction purposes is usually coarse-grained sand and/or gravel with relatively high porosity and permeability (e.g., the fill material is typically highly transmissive to fluid flow). This corresponds to a reduced ability for imported fill material to filter any accidental chemical releases or spills that may occur at the facilities

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during Site operations relative to finer-grained soil or fill materials. In the absence of impermeable containment systems (or if such systems fail to operate as designed), releases of contaminants at the Site would likely flow directly into highly transmissive imported fill material and soon after into highly transmissive underlying soluble bedrock. As documented above, soluble karst bedrock has the potential to transport contaminants large distances (miles) over short time periods (days or weeks).

The scope and level of an environmental investigation, including a geologic or hydrogeologic investigation, should be consistent with the complexity and stability of the Site as well as pertinent technical, environmental, and safety considerations (NYSDEC, 2010). Such considerations include but are not limited to:

- the complexity of the site geology and hydrogeology;
- the nature of the contaminants;
- exposure pathways and the distance to potential receptors;
- the identification of potential receptors not previously identified or addressed; and/or
- any other conditions NYSDEC identifies which necessitate the need for additional investigation activities.

Detailed investigation is typically appropriate to facilitate enhanced protection of human health, built structures, water quality, and the environment where Site conditions include one or more of the following conditions, all of which are suspected or have been positively identified at or adjacent to the proposed Micron Campus and Rail Spur Site:

- soluble bedrock with karst features;
- rock quality deficiencies; and
- aquifers susceptible to contamination.

The NYSDEC and the New York State Department of Health (NYSDOH) are concerned about the protection of water resources in karst areas and have been collaborating with the agricultural community to increase their awareness of karst and how to manage dairy farming activities to reduce their impact on water resources, particularly in karst areas (Kappell et al., 2020). Major karst features such as large sinkholes are not required for an area of soluble bedrock to act as a rapid conduit for subsurface water and contaminant migration; in fact, some of the worst contamination events have occurred in areas where only minor karst features are present (Kappel et al., 2020). In addition to manure from agricultural activities, karst aquifers in New York State have also been contaminated by unintended spills or improper chemical handling or disposal of contaminants such as petroleum products, chlorinated solvents, or other commercial or industrial chemicals, many of which are commonly used in semiconductor manufacturing operations (NIST, 2024). Due to increasing legal conflicts between citizen groups, farm operators, and regulatory agencies, Richardson (2020) evaluated the regulation of manure management at concentrated animal feeding operations (CAFOs) in karst areas in selected midwestern states. The factors at a site that govern the transport and fate of contaminants from agricultural operations into surface water and groundwater resources (e.g., physical and chemical properties, climatic conditions, geologic and hydrogeologic conditions, etc.) are substantially similar for many commercial or industrial contaminants. While the level of regulation of karst areas varies considerably from state to state, common provisions in states that have enacted more proactive regulations to minimize the potential for contamination events (and thereby enhance the protection of human health and the environment) include:

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- vertical separation requirements for distances between the bottom of storage facilities and karst bedrock (e.g., must be ≥ 10 feet in Minnesota);
- horizontal separation requirements for surface distances between karst features and storage facilities (e.g., up to 800 feet from certain karst features for certain structures in Iowa); and
- more stringent design and construction requirements intended to prevent seepage of stored materials into water resources (e.g., in Ohio, no storage may be located in a karst area without groundwater monitoring and engineered controls).

KEY FINDINGS

Physical Setting

1. The 10-foot contour interval used in the topographic maps presented in Section 3.2 of the Draft EIS is inadequate to identify topographic features with less than 10 feet of relief. Field experience has shown that many karst features in central New York have less than 10 feet of topographic relief.
2. Topographic maps presented in the Draft EIS also show areas of steeper slopes at the Site, which are indicated by brighter shades of red. Close examination of these figures show numerous locations with generally circular or elliptical areas of connected (closed) steeper slopes. Some (possibly many) of these areas may represent closed circular or elliptical topographic depressions, which are common landforms that occur in karst areas.
3. Review of topographic contours at the Site previously published by NYSDOT (1989) shows numerous water-filled closed topographic depressions on and near the proposed Micron Campus. Water-filled closed topographic depressions are common landforms that occur in karst areas.
4. The proposed Micron Campus and Rail Spur Site are located fully within a geological hazard area as determined by the Syracuse-Onondaga County Planning Agency and the Onondaga County Department of Emergency Management. The geological hazard consists of dolostone (dolomite) and limestone bedrock, which are soluble carbonate rocks that are susceptible to the formation of karst features such as solution-enlarged fractures, sinking streams, sinkholes, and others.

Soil/ Glacial Deposits

5. Soil and glacial deposits encountered at the Site are highly variable. The Draft EIS states that many of these soil and glacial deposits (particularly the finer-grained and wetter deposits) are unsuitable for proposed Site construction activities and will therefore need to be removed and replaced with more suitable imported fill materials (e.g., coarse-grained, relatively permeable fill materials such as sand and gravel). Specifically, Section 3.2.3.2 of the Draft EIS indicates that an estimated 1.5 million cubic yards of native soil and glacial deposits at the Site will be removed during construction of the proposed Micron Campus. Therefore, Micron is proposing to remove a large volume of relatively impermeable soil and replace it with more permeable fill materials, which will increase water infiltration into the subsurface. Removal of significant amounts of soil or other cover over karst features may accelerate or trigger the development of sinkholes and other karst features through a variety of processes. The velocity of water in karst is much greater than in overburden porous media (i.e., soil/glacial deposits or imported fill materials), and the replacement of fine-grained soils with sand and gravel fill materials will increase average velocity in the overburden even

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more, making erosion of subsurface cavities faster and more likely regardless of the type of bedrock present.

6. Soil and glacial deposits can obscure karst features in the landscape and thus result in a geologic condition known as “covered” or “mantled” karst. Areas of covered or mantled karst often have no obvious karst features visible at the surface. The statement in Section 3.2.2.1 of the Draft EIS that karst topography was not noted at the Site does not equate to an absence of existing karst features at the Site.

Bedrock

7. Site bedrock consists predominantly of dolostone with lesser amounts of dolomitic to calcareous shale. Site bedrock is prone to the development of dissolution (karst) features and associated geologic hazards including land subsidence, flooding, and slope movements due to the dissolution of bedrock and is identified in a list of karst aquifers published by the USGS (Kappel et al., 2020).
8. The structural attitude of Site bedrock likely consists predominantly of sub-horizontal bedding that strikes generally east-west and dips gently (typically one degree or less) towards the south. Several sets of regional joints or fractures occur in area bedrock with predominant structural trends striking generally northwest and generally east-northeast. These regional joint and fracture sets commonly act as preferential pathways for water migration and the development of solution-enlarged joints and fractures in soluble carbonate or evaporite bedrock formations, such as those that occur at and near the Site.
9. Depth to bedrock is variable at the Site, which is common in areas of karst geology and may indicate a zone of epikarst. Epikarst is a concentrated area of dissolution features and enhanced porosity and permeability that typically occurs in the upper portions of carbonate or evaporite bedrock in karst areas, and the epikarst typically contains significant amounts of stored water.
10. Photographs and data in boring logs from 81 bedrock core runs collected at 45 boring locations during three phases of geotechnical investigation at the Site document features consistent with the dissolution of soluble bedrock (i.e., karst features), including:
 - numerous fractured or broken areas contain weathering that is consistent with dissolution and solution enlargement;
 - rock cores with “poor” to “very poor” RQD, which commonly correspond to intervals with a higher degree of weathering consistent with karst dissolution and solution enlargement;
 - a possible void with a minimum diameter of at least 1.9 feet may have been encountered at one location;
 - drilling water was lost to the bedrock formation in three rock core runs from two boreholes, indicating the localized presence of subsurface voids or conduits with the ability to transmit significant amounts of water (or other fluids) at a very rapid rate; and
 - unconsolidated silt or clay seams that are consistent with and may represent sediment transported by turbulent water flow within karst bedrock conduits.

Hydrology and Water Resources

11. The general lack of permanent water-filled stream channels at the Site demonstrates significant water infiltration vertically downwards into the underlying soil/glacial deposits and underlying bedrock (i.e., sinking or losing streams) and the predominance of subsurface drainage at the Site. This drainage condition is characteristic of karst environments and is typically conducive to the formation and intensification of dissolution features in soluble

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- bedrock that occurs at the Site. The surface water hydrology of Youngs Creek and the proposed Micron Campus and Rail Spur Site are consistent with a karst hydrologic system.
12. Section 3.2, Section 3.3, Appendix F, and Appendix E of the Draft EIS do not present groundwater contour maps, groundwater potentiometric surface maps, geologic cross sections, bedrock surface contour maps, or other maps and data that would allow an evaluation that characterizes the impacts of site development on shallow and deep groundwater flow systems on and adjacent to the Site. Therefore, surface water and groundwater flow and interaction within the Water Resources Study Area has not been evaluated or is not presented and discussed in the Draft EIS.
 13. Many of the private water supply wells located within the Water Resources Study Area have not been considered and incorporated into the Draft EIS because the Draft EIS currently considers only private water supply wells that were installed during or after April 2000. Many of the private water supply wells in the area were likely installed prior to April 2000. While public water is available in the area, that is not a good reason to ignore data available from private water supply wells and the possibility that private water supply wells used for irrigation, farm animals, or other agricultural or residential uses can still be detrimentally affected causing significant impacts.
 14. Inspection of NYSDEC water well completion reports in the area indicate a high yield private water supply well designated OD2031 was installed in 2008 and produces groundwater from black limestone bedrock that is similar to bedrock in rock cores recently installed and described at various locations beneath and near the proposed semiconductor fabrication facilities. This private water supply well is located approximately 600 feet from the eastern boundary of the proposed Micron Campus and has a high yield (stabilized discharge) of 100 gallons per minute (gpm) of groundwater that is produced exclusively from shallow bedrock. High well yields from shallow bedrock are typical of karst aquifers. The proposed semiconductor fabrication facilities are located directly over a productive bedrock aquifer that has been (and may still be) recently used for local water supply purposes.
 15. A private water well survey is not presented in the Draft EIS. Therefore, the current extent of local usage of the productive bedrock aquifer for water supply has not been evaluated or has not been presented in the Draft EIS.
 16. A portion of the western boundary of the proposed Micron Campus and Rail Spur Site is located approximately 1.0 mile from a confined aquifer located in the western portion of the Water Resources Study Area. Figure F-37 from the Draft EIS indicates that groundwater beneath western portions of the Micron Campus and Rail Spur Site flows towards this aquifer. Potential hydraulic connections between soluble bedrock at the Site and this confined aquifer either have not been evaluated or have not been presented in the Draft EIS, and the data and discussion provided in the Draft EIS fail to rule out detrimental impacts to this confined aquifer.
 17. A portion of the western boundary of the proposed Micron Campus and Rail Spur Site is located approximately 2.9 miles from the Baldwinsville Primary Aquifer. Primary Aquifers are defined by NYSDEC as "highly productive aquifers presently utilized as sources of water supply by major municipal water supply systems". Primary Aquifers are afforded special protection by NYSDEC regulations governing the siting of potential sources of contamination. Figure F-38 from the Draft EIS indicates that groundwater beneath portions of the Micron Campus and Rail Spur Site flows towards this aquifer. Potential hydraulic connections between soluble bedrock at the Site and the Baldwinsville Primary Aquifer either have not been evaluated or have not been presented in the Draft EIS, and the data and discussion provided in the Draft EIS fail to rule out detrimental impacts to this Primary Aquifer.

Potential Contaminants and Contaminant Migration

18. Potential contaminants associated with semiconductor manufacturing may include a wide variety of chemicals, compounds, or elements including but not limited to alcohols, ammonia, carbon, cyanides, glycols, halogens, metals/inorganics, nitrogen and its compounds, peroxides, PFAS, acidity/alkalinity (measured as pH), phosphorous and its compounds, silica, sulfur and its compounds, TDS, TMAH, TSS, and toxic organic compounds including but not limited to certain VOCs and SVOCs.
19. Some of the chemicals proposed for use at the Site are widely considered by numerous authorities having jurisdiction as “emerging contaminants”, which are generally substances that are relatively new to our awareness and understanding regarding their presence in the environment, their mobility and persistence in the environment, and/or their potential impacts on human health and the environment. Such chemicals include but are not limited to PFAS, 1-4 dioxane, and TMAH. The industrial discharge of some emerging contaminants is prohibited by some wastewater treatment authorities as a means to avoid or minimize interference with water treatment facilities and therefore enhance protection of human health, water resources, and the environment.
20. Even though the discharge of treated industrial wastewater from Micron’s operations will occur under a SPDES permit issued by NYSDEC, the Draft EIS states that contaminants from Micron’s fabrication operations will be discharged into the Oneida River. The Draft EIS does not indicate the identity and concentrations of potential surface water discharges and therefore detrimental impacts cannot be ruled out. The proposed approach/discharge may add significant contaminant mass into the Oneida River. Contaminants would subsequently migrate to surface water and sediment further downstream, including the Oswego River and Lake Ontario.
21. Depth to bedrock is shallow in some areas and excavation and removal of significant volumes of bedrock is proposed in some portions of the Site, particularly beneath the proposed semiconductor fabrication facilities. As a result, there may be little to no soil or imported fill material between the bottom of the proposed semiconductor fabrication facilities and the top of soluble bedrock, which corresponds to little to no ability to filter any accidental chemical releases or spills that may occur at the facilities during Site operations. Soluble bedrock with dissolution features (i.e., karst) has the potential to transport contaminants large distances (miles) over short time periods (days or weeks).
22. The scope and level of an environmental investigation, including a hydrologic or hydrogeologic investigation, should be consistent with the complexity and stability of the Site as well as pertinent technical, environmental, and safety considerations. Detailed investigation is typically appropriate to facilitate enhanced protection of human health, built structures, water quality, and the environment where soluble bedrock features, rock quality deficiencies, and/or aquifers susceptible to contamination at or near a site are suspected or have been positively identified (which is the case at this Site).
23. While the level of regulation of karst areas varies considerably from state to state (Richardson, 2020), common provisions in states that have enacted more proactive regulations to minimize the potential for contamination events (and thereby enhance the protection of human health and the environment) include:
 - vertical separation requirements for distances between the bottom of storage facilities and karst bedrock (e.g., must be ≥ 10 feet in Minnesota);
 - horizontal separation requirements for surface distances between karst features and storage facilities (e.g., up to 800 feet from certain karst features for certain structures in Iowa); and

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- more stringent design and construction requirements intended to prevent seepage of stored materials into water resources (e.g., in Ohio, no storage may be located in a karst area without groundwater monitoring and engineered controls).

SUMMARY AND CONCLUSIONS

1. Multiple lines of evidence including the Site's physical setting, geology, and hydrology indicate the proposed Micron Campus and Rail Spur Site are located directly over a productive soluble bedrock aquifer with features consistent with a karst aquifer. This aquifer is likely used by some property owners in the area for water supply. Karst aquifers are highly susceptible to contamination, and contamination can move long distances (miles) in karst aquifers quickly (days or weeks) with little attenuation (Veni, 1999; Palmer, 2007; Taylor and Greene, 2008; Gutierrez et al., 2014; Kappel et al., 2020; NRCS, 2022). Other natural and human-induced geologic hazards of karst including land subsidence, sinkholes, flooding, and slope movements are typically caused or aggravated by the redirection and concentration of water and/or the removal of soil, bedrock, or other cover over karst features during site development (Gutierrez et al., 2014). To determine the extent of the hazard, areas of focused groundwater recharge need to be identified and the probability of the hazard occurring within some time period needs to be assessed (Kappel et al., 2020). Based on the geologic formations underlying parts of Onondaga County, including the proposed Micron Campus and Rail Spur Sites, subsidence and sinkhole events may occur gradually or abruptly according to SOCPA & OCDEM (2019). If long-term subsidence or sinkhole formation is not recognized and mitigation measures are not implemented, subsidence and sinkholes could potentially cause significant property damage and/or loss of life (SOCPA & OCDEM, 2019). The presence of karst features on, beneath, and near the proposed Micron Campus and Rail Spur Sites, including closed circular depressions and solution-enlarged joints and fracture zones, requires additional consideration, characterization, evaluation, planning, and monitoring to facilitate protection of human health, built structures, water quality, and the environment.
2. The amount of local usage of the productive bedrock aquifer for water supply is currently unknown. The assessment provided in the Draft EIS apparently includes private water supply wells from Oswego County that are incorrectly mapped in this area and does not include private water supply wells that were installed prior to April 2000. It is likely that many private water supply wells in this area were installed prior to April 2000 given the Town's long history of residential development and the fact that municipal water was not available in the vicinity of the Site until the late 1960s at the earliest (OCWA, 2025). Therefore, the owners of (and data from) private water supply wells installed prior to April 2000 have not been considered and incorporated into the Draft EIS. A private water well survey should be performed to provide information on the amount of local usage of the productive bedrock aquifer and to incorporate all private water well owners and available data into the Final EIS.
3. Section 3.3.3.4 of the Draft EIS indicates that the depth to groundwater at the site ranges from 0.1 to 7.8 feet below the ground surface in the western portion of the proposed Micron Campus. The shallow depth to groundwater at the Site indicates it is extremely likely that there is significant interaction between surface water and groundwater at the Site. Surface water elevations are not provided in any portion of Section 3.2 or Section 3.3 of the Draft EIS, and apparently none of the 42 groundwater monitoring wells reportedly installed at the Site to date are installed within the productive bedrock aquifer. Therefore, the existing water

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level monitoring network described in Section 3.2.2.2, Section 3.2.4, Section 3.3.3.4, Section 3.3.4.2, Section 3.3.5, and Section 3.7.4 of the Draft EIS is insufficient to evaluate site hydrology and hydrogeology in the Water Resources Study Area, particularly with regard to evaluation and identification of likely connections/interaction between surface water, shallow groundwater in overburden, and deeper groundwater in the underlying productive bedrock aquifer. A map showing the location of all monitoring wells is not provided and boring logs and monitoring well completion records for wells installed after the three rounds of geotechnical investigation also are not provided in Section 3.2, Section 3.3, Appendix F, and Appendix E of the Draft EIS. Additionally, the Draft EIS does not present groundwater contour maps, groundwater potentiometric maps, geologic cross sections, bedrock surface contour maps, or similar maps and data that are typically prepared and presented in an evaluation of groundwater flow and surface water and groundwater interaction (including both overburden groundwater and bedrock groundwater). Therefore, surface water and groundwater interaction within the Water Resources Study Area has not been evaluated and/or has not been presented nor discussed in the Draft EIS at a level commensurate with the complex geology and hydrogeology of the Site. Characterization of surface water and groundwater interaction is required for an understanding of potential risks in areas of soluble bedrock such as the Site, and the measures that may be necessary to mitigate the risks of karst to human health, built structures, water resources, and the environment (Gutierrez et al., 2014; ASTM, 2023).

4. While the Draft EIS identifies by name some specific chemicals and products that are planned for use by Micron, other chemicals and products are identified in numerous sections of the Draft EIS only by generic chemical categories, such as PFAS, metals, oxidizers, corrosives, etc. In the absence of more information on the specific chemicals to be used at the Site, all authorities having jurisdiction should consider initially requiring analysis for all potential contaminants identified in USEPA and NIST lists of chemicals commonly used in semiconductor fabrication operations (USEPA, 2022; NIST, 2024). The analytical list may be able to be reduced after an initial period of sampling and laboratory analysis demonstrates that certain analytical parameters are not detected in wastewater effluent from Micron's operations, presuming that the reduced parameters are not subsequently introduced into Micron's operations at a later date.
5. Some of the chemicals proposed for use at the Site are widely considered by numerous authorities having jurisdiction as "emerging contaminants", which are generally substances that are relatively new to our awareness or understanding regarding their presence in the environment, their mobility and persistence in the environment, and/or their potential impacts on human health and the environment. Such chemicals include but are not limited to PFAS, 1-4 dioxane, and TMAH. For example, TMAH, which is widely used in the semiconductor industry in silicon etching, has a high solubility in water, a high affinity to bind to solids, and is toxic and therefore inhibits biological processes relied upon for wastewater treatment and water quality protection (TRA, 2025). There is currently no laboratory analytical method approved by USEPA for analysis of TMAH. Therefore, the industrial discharge of TMAH is prohibited by some wastewater treatment authorities, such as the Trinity River Authority (TRA) in Texas (TRA, 2025). If it has not already done so, OCDWEP should consider consulting with TRA or other water authorities that accept wastewater from semiconductor fabrication facilities. The Onondaga County Department of Water Environment Protection (OCDWEP) may also want to consider prohibiting the discharge of TMAH and other emerging contaminants to the publicly-owned treatment works (POTW), or alternatively requiring Micron to pretreat its wastewater on the Micron Campus to levels that can be

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demonstrated by Micron at its expense as not harmful to the efficiency or effectiveness of Onondaga County's POTW.

6. Even though the discharge of treated industrial wastewater from Micron's operations will occur at the Oak Orchard wastewater treatment plant under a SPDES permit issued by NYSDEC, contaminants from Micron's fabrication operations will be discharged into the Oneida River under the proposed approach outlined in Section 3.2.1, Section 3.2.3.2, Section 3.3.2, Section 3.3.4.2, and other sections of the Draft EIS. The proposed approach/discharge may add significant contaminant mass into the Oneida River, which would subsequently migrate to surface water and sediment further downstream, including the Oswego River and Lake Ontario.
7. Section 3.2, Section 3.3., Appendix E, and Appendix F (Volume 1, Part 1) of the Draft EIS for this Site do not indicate that these sections were prepared under the direction of a New York State-licensed Professional Geologist with specialized training and experience in karst survey and assessment methods. Given the complex hydrology and hydrogeology of the Site, including a professional geologist in the team directing the preparation and finalization of these sections of the EIS should facilitate enhanced protection of human health, built structures, water resources, and the environment.

RECOMMENDATIONS

Based on currently available geologic data and information, initiation of construction activities such as the excavation and removal of soil or bedrock at the Site is not recommended at this time based on the documented occurrence of soluble bedrock with evidence of dissolution and highly variable subsurface conditions at the Site that could lead to fast, turbulent subsurface water flow and further dissolution of soluble bedrock. These surface and subsurface conditions are consistent with karst geology/features and can pose significant risks to human health, built structures, water quality, and the environment through the formation of unwanted and damaging land subsidence, flooding, slope movements, and/or contaminant migration. The Draft Environmental Impact Statement (EIS) fails to acknowledge the presence of karst-like conditions at the Site and is therefore insufficient to assess the impacts of highly variable subsurface conditions on site preparation and development. Focused areas of groundwater recharge need to be identified to help prevent contamination from sources on or adjacent to karst features and to avoid or minimize natural and human-induced geologic hazards and impacts in areas of soluble bedrock such as land subsidence, flooding, and slope movement. The review uncovered significant data and information gaps regarding the Site's geology, soils, topography, and water resources, including but not limited to recent nearby use of a productive bedrock aquifer for local water supply. Additional investigation and characterization of the Site's geology, hydrology, and local groundwater use are required to inform the public and to assist owners, operators, design professionals, plan reviewers, public works officials, and jurisdictional regulators in making informed decisions on Site development and management.

The following additional recommendations are provided in response to existing data and information gaps and to address the key findings and conclusions contained in this report.

1. Conduct a systematic assessment of karst within the entire Water Resources Study Area through performance of a Preliminary Karst Assessment for Site Development in conformance with the ASTM D8512-23 standard (ASTM, 2023). Personnel who do not have specialized training and experience in karst survey and assessment methods should obtain

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assistance from qualified professionals with specialized training and experience in karst survey and assessment methods.

2. Perform a water supply well survey and prepare an inventory of all property owners within five miles of the Micron Campus to accurately determine the number and extent of private water supply wells in the area that produce (or have the ability to produce) groundwater from the productive bedrock aquifer. This survey would provide a better understanding of the extent of use of this bedrock aquifer and will ensure that all private water supply well owners and data from private water wells in the area are considered and incorporated into the Final EIS.
3. Perform additional hydrologic and hydrogeologic characterization of the Water Resources Study Area, including characterization of the productive bedrock aquifer and all other hydrogeologic units present within the Water Resources Study Area. The hydrogeologic characterization should be performed under the direction of a New York State-licensed Professional Geologist with specialized training and experienced in the assessment of karst areas. Incorporate the results of all hydrologic and hydrogeological characterization into the Final EIS. At a minimum, the additional characterization should include the following major scope of work components at appropriate locations:
 - a. Establish and survey surface water elevation measurement stations;
 - b. Perform surface fracture characterization (e.g., remote sensing, lineament and fracture trace analyses);
 - c. Perform surface geophysical investigation using one or more methods discussed in ASTM (2020) tailored for subsurface fracture detection (e.g., seismic reflection, frequency-domain electromagnetic) and void or sinkhole detection (e.g., electrical resistivity, ground penetrating radar, gravity);
 - d. Install additional monitoring wells at appropriate locations and depths, including coupled overburden and bedrock monitoring wells;
 - e. Incorporation of existing private water supply wells (particularly bedrock wells) acquired by Onondaga County from former property owners on or near the proposed Micron Campus and Rail Spur Sites into the hydrogeological investigation;
 - f. Borehole geophysical investigations;
 - g. Aquifer characterization testing and analysis, including but not necessarily limited to aquifer pumping tests and dye tracing;
 - h. Sampling and field and/or laboratory analysis of surface water and groundwater from each hydrogeologic unit present in the Water Resources Study Area to characterize water quality, including but not necessarily limited to major cations, major anions, pH, temperature, conductivity, oxidation-reduction potential, and potential contaminants;
 - i. Preparation of overburden thickness, water infiltration potential, groundwater contour, potentiometric surface, geologic cross sections, bedrock surface contours, aquifer thickness, well yield, land use, and/or other mapping and evaluation as appropriate based on the results of the hydrogeologic investigation;
 - j. Development of a comprehensive Conceptual Site Model of the hydrology and hydrogeology of the Water Resources Study Area that includes all hydrologic and hydrogeologic units identified during the investigation; and
 - k. Preparation of a report describing all characterization methods, findings, conclusions, and recommendations. The report should be made available to the public for review and comment prior to finalization and approval.
4. In the absence of Micron providing an initial list and quarterly updates of all specific chemicals to be used at its Clay semiconductor fabrication facilities, all authorities having jurisdiction should consider requiring sampling and laboratory analysis for all

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elements/compounds/chemicals listed in Appendices C and D of the CHIPS Program Office Final Programmatic Environmental Assessment document dated 28 June 2024 (NIST, 2024). With regards to PFAS and/or other organofluorine compounds, in addition to analysis for all target PFAS analytes by USEPA Method 1633, all authorities having jurisdiction should also consider requiring analysis of total organic fluorine (TOF) and total oxidizable precursors (TOP) assay to provide an estimate of the mass of PFAS (in the form of free perfluoroalkyl acid precursors) and/or other organofluorine compounds present in discharged wastewater from Micron's operations at the Site. The TOP assay is the most widely commercially available of the qualitative PFAS analytical techniques and is typically accepted as a means of determining PFAS load on remediation (treatment) media (ITRC, 2023). This recommendation applies to all regulatory programs (e.g., SPDES monitoring, response to any environmental investigation and/or remediation required for any spills or releases from the Micron Campus and/or connected actions, etc.) and to all applicable environmental matrices (e.g., water, wastewater, soil, sediment, etc.). Required analysis lists may be able to be reduced after an initial period of sampling and laboratory analysis demonstrates that certain analytical parameters are not detected at concentrations of concern in wastewater effluent or other discharges or releases from Micron's operations, and presuming that the reduced parameters are not subsequently introduced into Micron's operations at a later date.

5. Regarding the emerging contaminant TMAH, which is widely used in the semiconductor industry in silicon etching, there is currently no USEPA-approved method for laboratory analysis of TMAH. If it has not already done so, OCDWEP should consider consulting with TRA or other water authorities that have experience accepting wastewater from semiconductor fabrication facilities regarding an effective laboratory analytical methodology for TMAH and/or to evaluate whether OCDWEP may want to consider prohibiting the discharge of TMAH into Onondaga County's POTW (or alternatively requiring Micron to pretreat its wastewater on the Micron Campus to TMAH concentrations that can be demonstrated by Micron at its expense as not harmful to the efficiency or effectiveness of Onondaga County's POTW).
6. To reduce environmental impacts, Micron should consider proactively supporting NYSDEC's Water Quality Antidegradation Policy (NYSDEC, 1998) and the findings and objectives of the Great Lakes-St. Lawrence River Basin Sustainable Water Resources Agreement of December 13th, 2005 by proactively treating their wastewater before it leaves the Micron Campus to an extent that will avoid the planned discharge of contaminant mass into the waters of the People of the State of New York and the larger, connected Great Lakes Basin.
7. At a minimum, Section 3.2, Section 3.3., Appendix E, and Appendix F (Volume 1, Part 1) of the Final EIS for this Site should be prepared and finalized under the direction of a New York State-licensed Professional Geologist with specialized training and experience in karst survey and assessment methods to facilitate enhanced protection of human health, built structures, water resources, and the environment.
8. There are controls that should be able to mitigate the concerns raised and documented in this report. If Micron chooses not to perform additional investigation and characterization of the Site's hydrology and hydrogeology, all authorities having jurisdiction should consider requiring Micron to provide specific design plans prepared under the direction of a New York State-licensed Professional Engineer that will mitigate the concerns raised and documented in this report.

Attachment A
Figures

Figure 01 – Micron Campus and Surrounding Areas

Source: Figure 3.1-1, Micron Draft EIS (CPO & OCIDA, 2025), unmodified

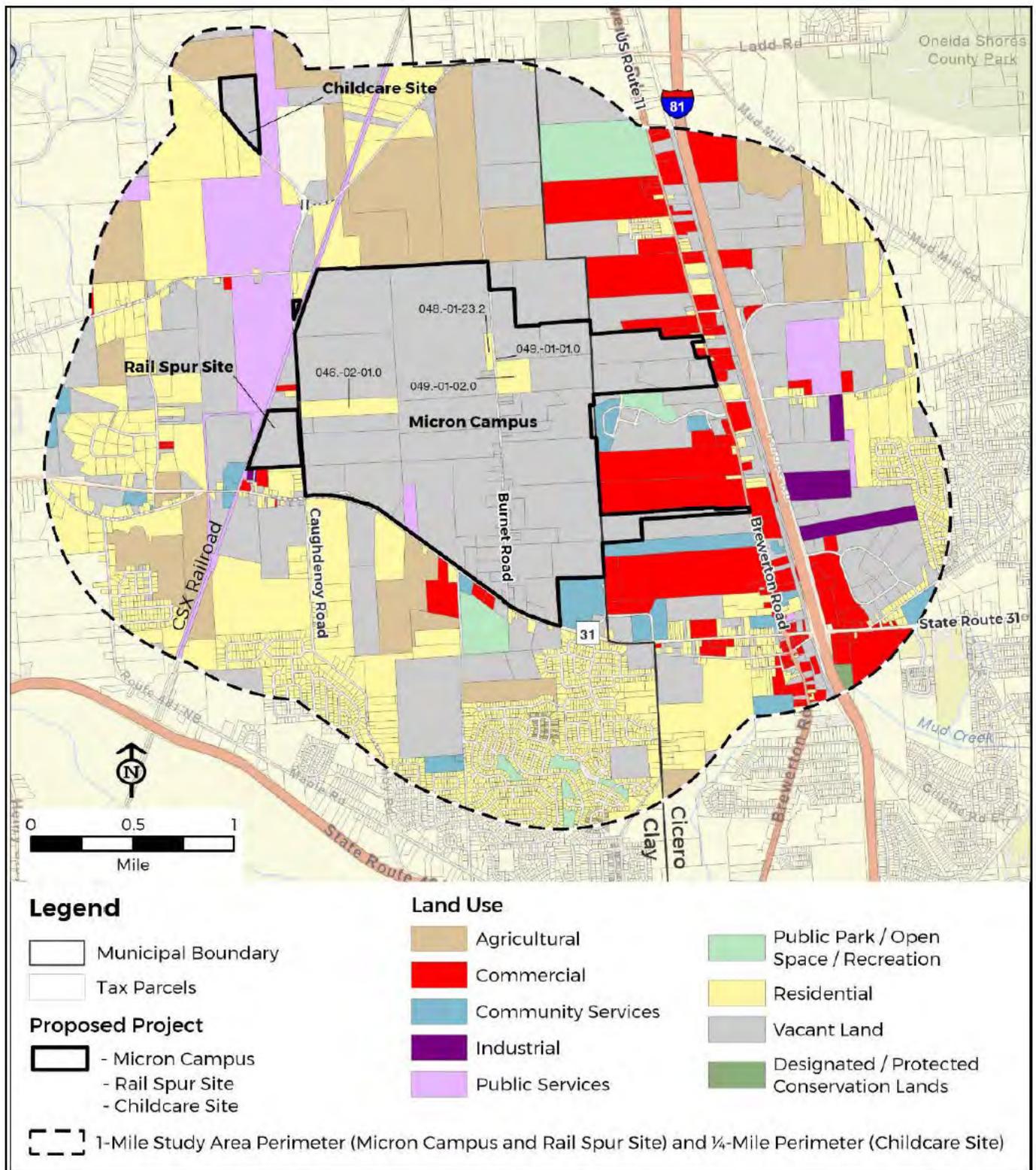
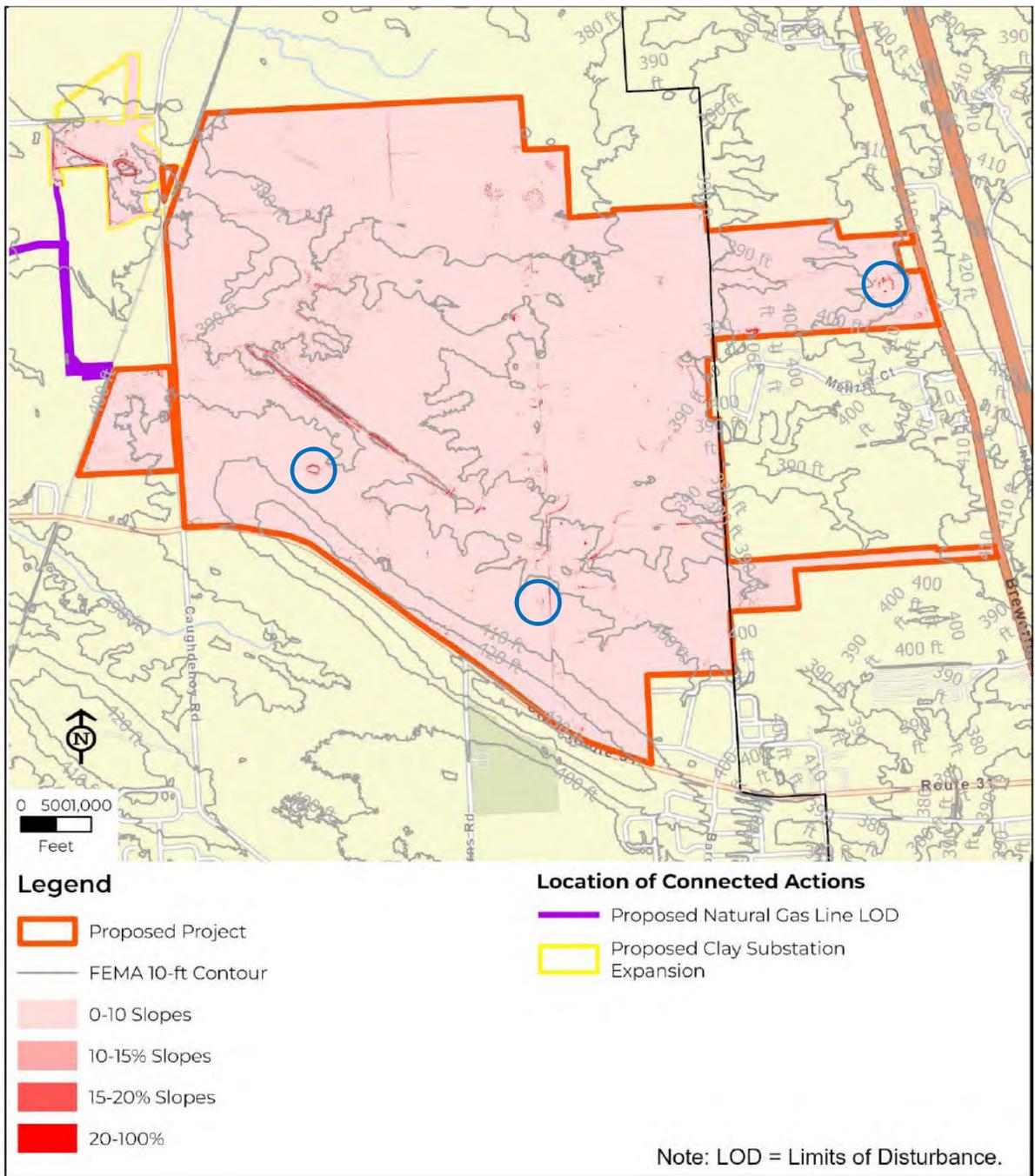


Figure 02 – Topography at the Proposed Micron Campus

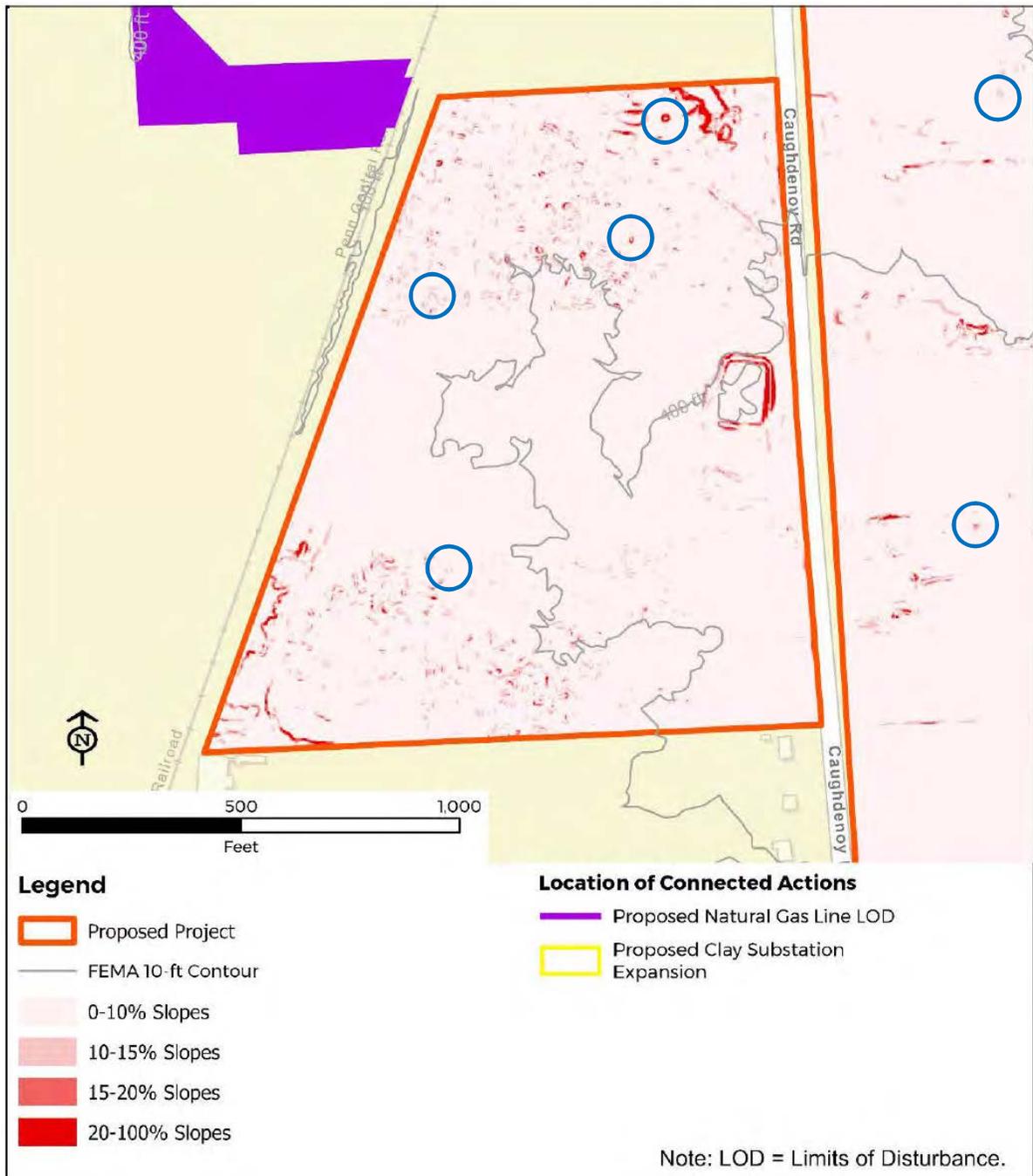
Source: Figure E-2, Micron Draft EIS (CPO & OCIDA, 2025), modified to show selected areas of circular to elliptical slope



 = Selected Area of Circular or Elliptical Slope

Figure 03 – Topography at the Proposed Rail Spur Site

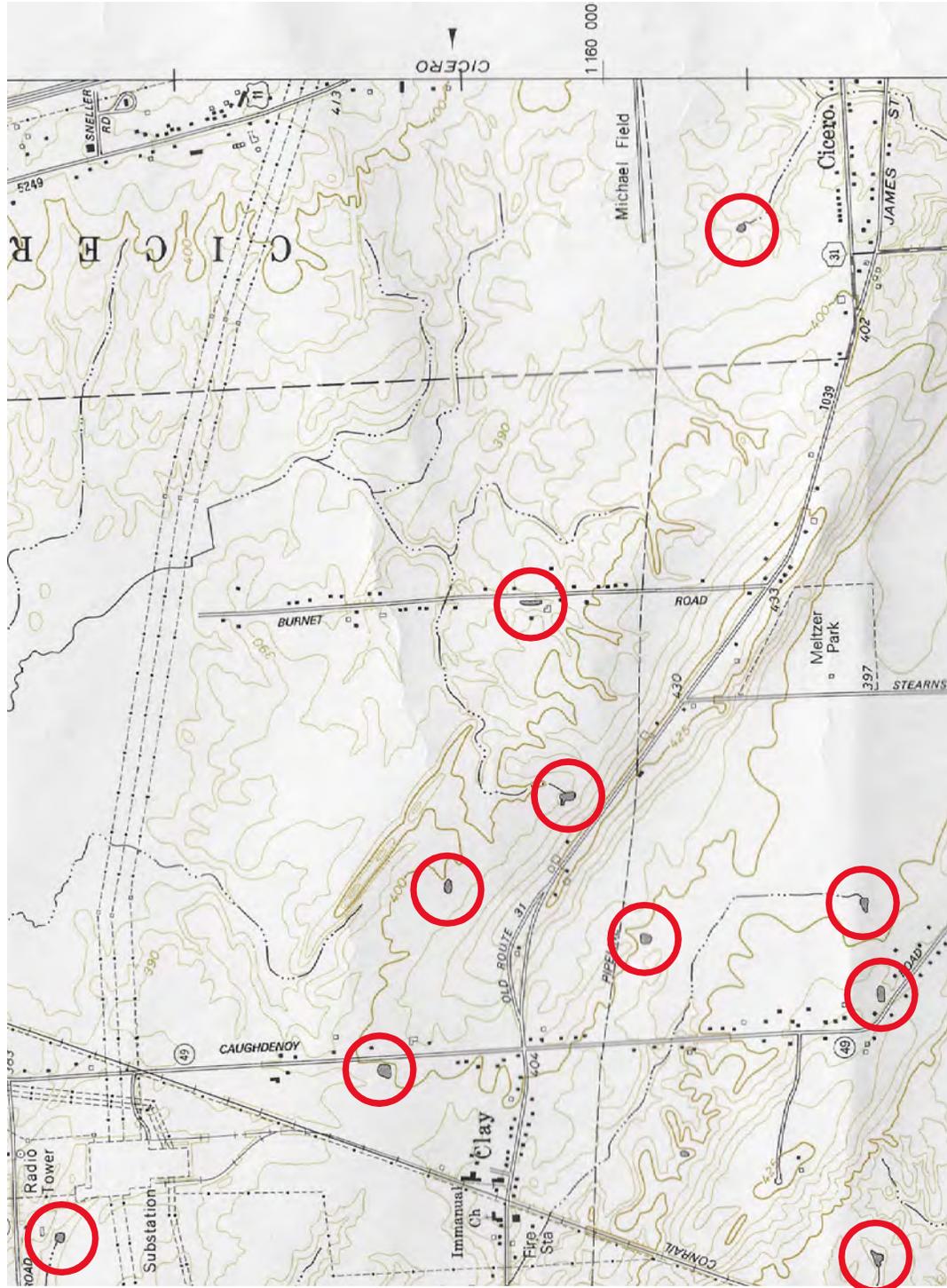
Source: Figure E-3, Micron Draft EIS (CPO & OCIDA, 2025), modified to show selected areas of circular or elliptical slope



 = Selected Area of Circular or Elliptical Slope

Figure 04 – Water-Filled Closed Topographic Depressions on and Near the Proposed Micron Campus

Source: NYSDOT (1989), modified to highlight selected features

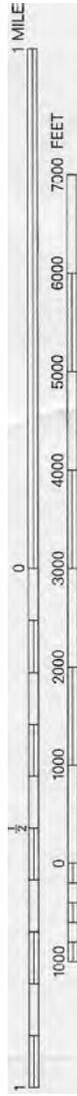


QUADRANGLE LOCATION

Map revisions made using aerial photography dated 1988, construction plans, official records and other sources. Features revised include: highways and other transportation facilities; civil boundaries; recreation sites; hydrography; and buildings. Gray tint indicates developed areas in which only landmark buildings are shown. Darker gray tint indicates open water features.



= Water-Filled Closed Topographic Depression



Contours, at 5-foot intervals, shown unrevised from 1973 U.S. Geological Survey map. Datum is mean sea level.

BREWERTON QUADRANGLE

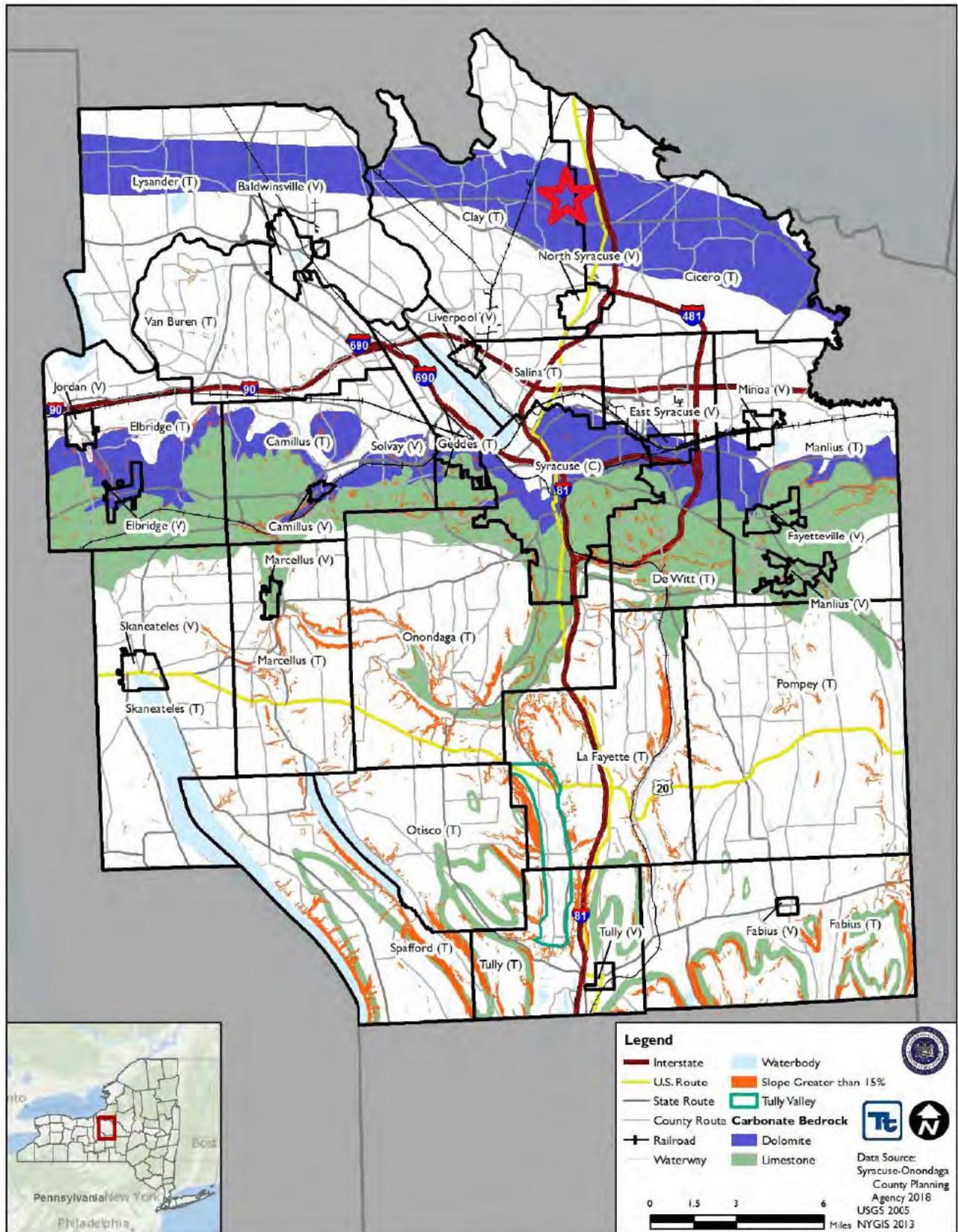
1989

Published in 1989 by the New York State Department of Transportation, in cooperation with the U.S. Department of Transportation, Federal Highway Administration.

Map base from 1973 U.S. Geological Survey 7.5-minute quadrangle.

Figure 05 – Geological Hazard Areas in Onondaga County

Source: Figure 5.4.4-9, Onondaga County Multi-Jurisdictional Hazard Mitigation Plan Update (SOCPA & OCDEM, 2019), modified to show location of proposed Micron Campus



 = Proposed Micron Campus Location

Figure 06 – Depth to Bedrock

Source: Figure 3.2-1, Micron Draft EIS (CPO & OCIDA, 2025), unmodified

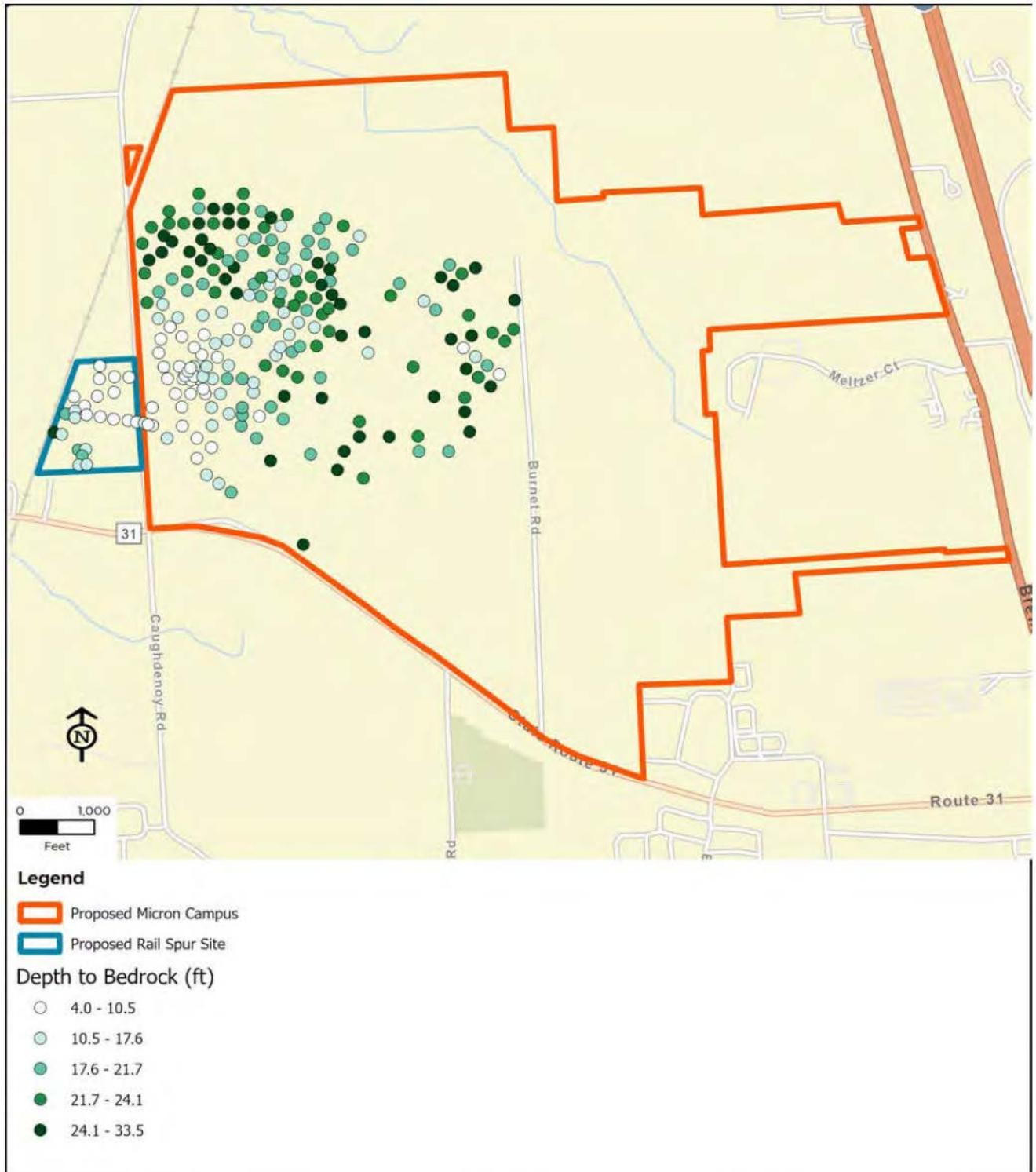


Figure 07 – Example of Highly Weathered Bedrock Core - Boring B-366 (Top of Run 1)

Source: Micron Draft EIS (CPO & OCIDA, 2025), Appendix E-4, Attachments to CME Report No. 28062B-03-1223, modified in red to highlight selected features

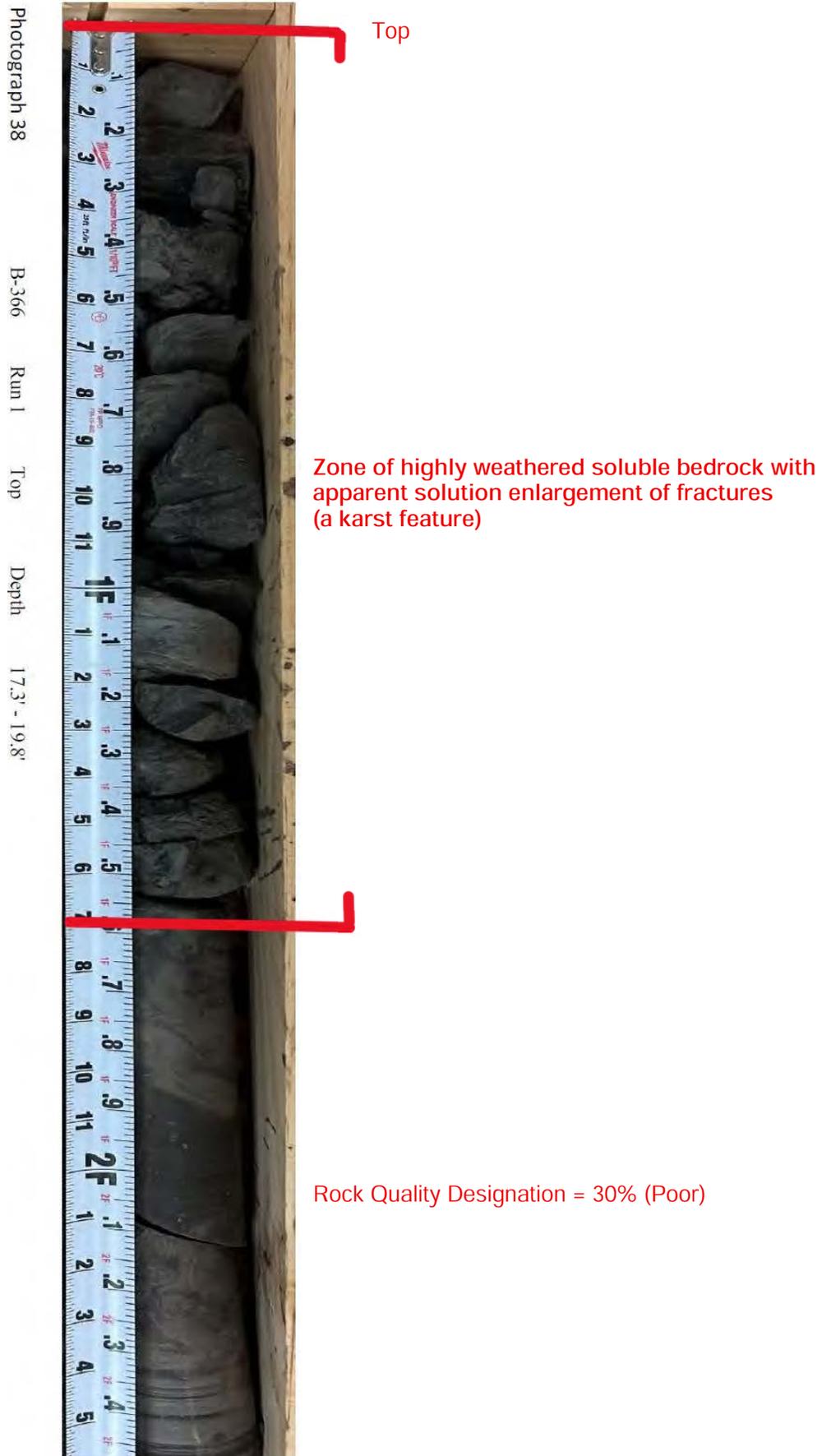


Figure 08 – Example of Highly Weathered Bedrock Core - Boring B-426 (Run 1 – Bottom)

Source: Micron Draft EIS (CPO & OCIDA, 2025), Appendix E-4, Attachments to CME Report No. 28062B-03-1223, modified in red to highlight selected features

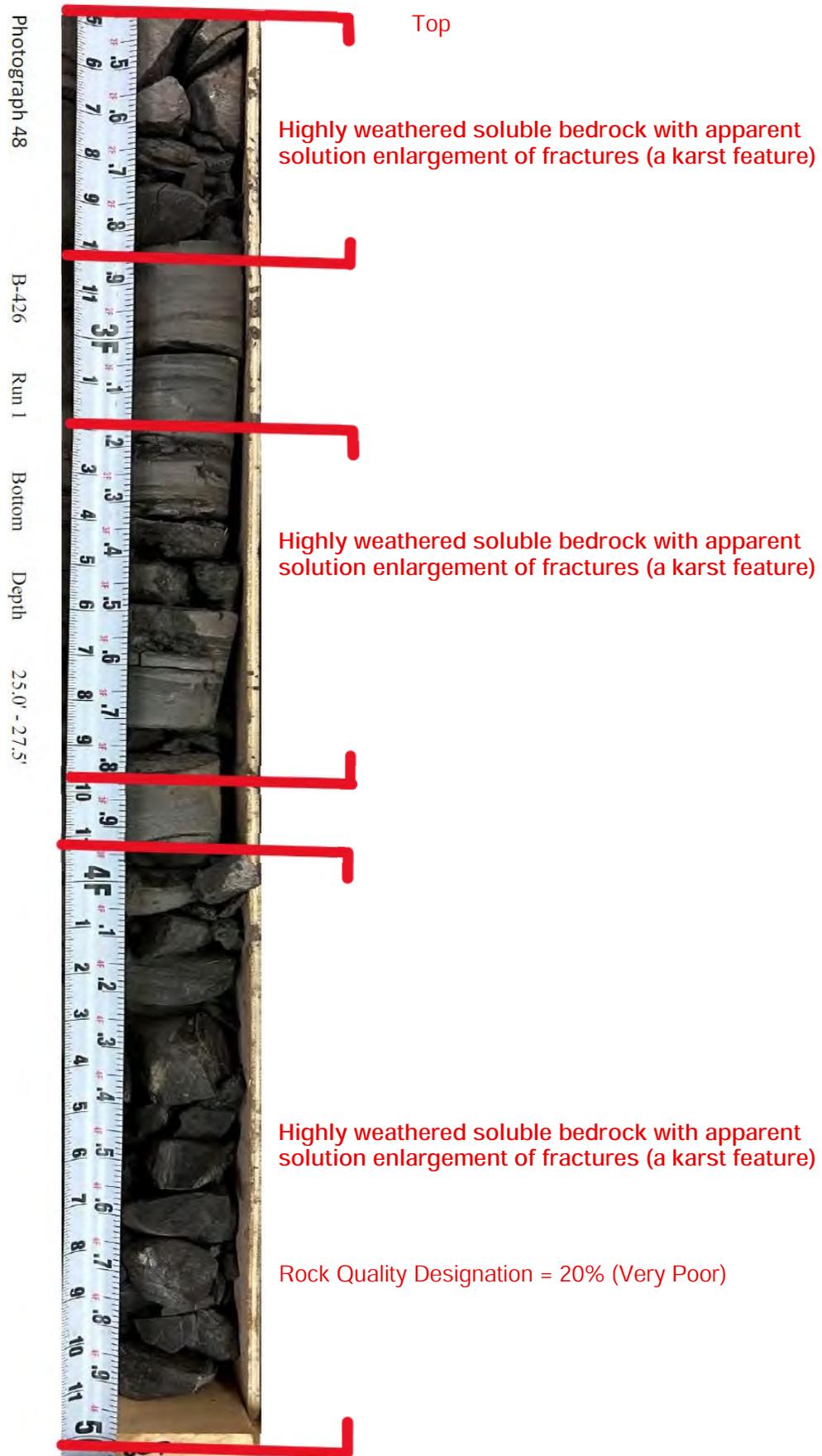


Figure 09 – Example of Moderately Weathered Bedrock Core - Boring B-292 (Bottom of Run 2)

Source: Micron Draft EIS (CPO & OCIDA, 2025), Appendix E-4, Attachments to CME Report No. 28062B-03-1223, modified in red to highlight selected features

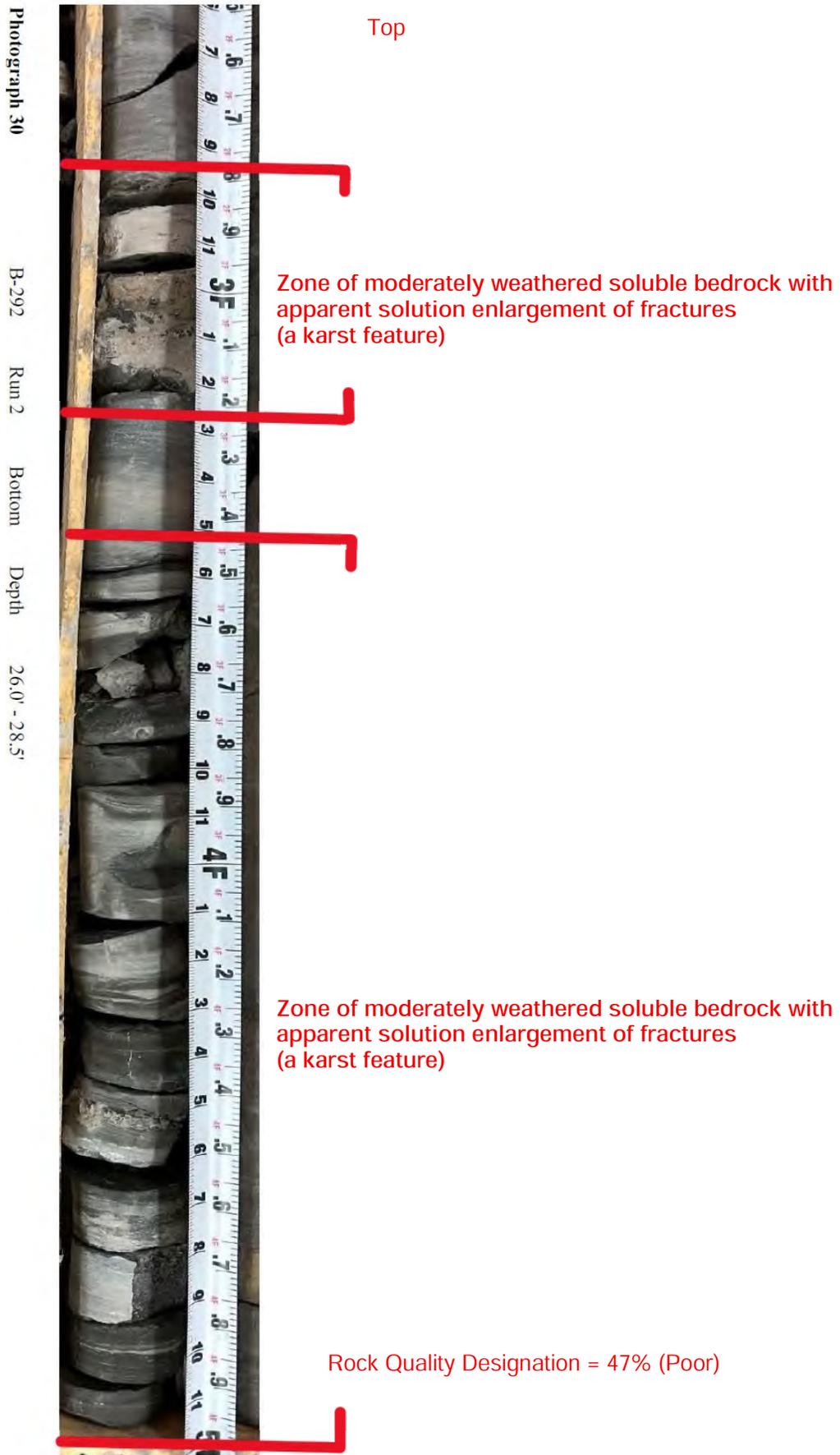


Figure 10 – Example of Slightly Weathered Bedrock Core - Boring B-588 (Top of Run 1)

Source: Micron Draft EIS (CPO & OCIDA, 2025), Appendix E-4, Attachments to CME Report No. 28062B-01-0624, modified in red to highlight selected features

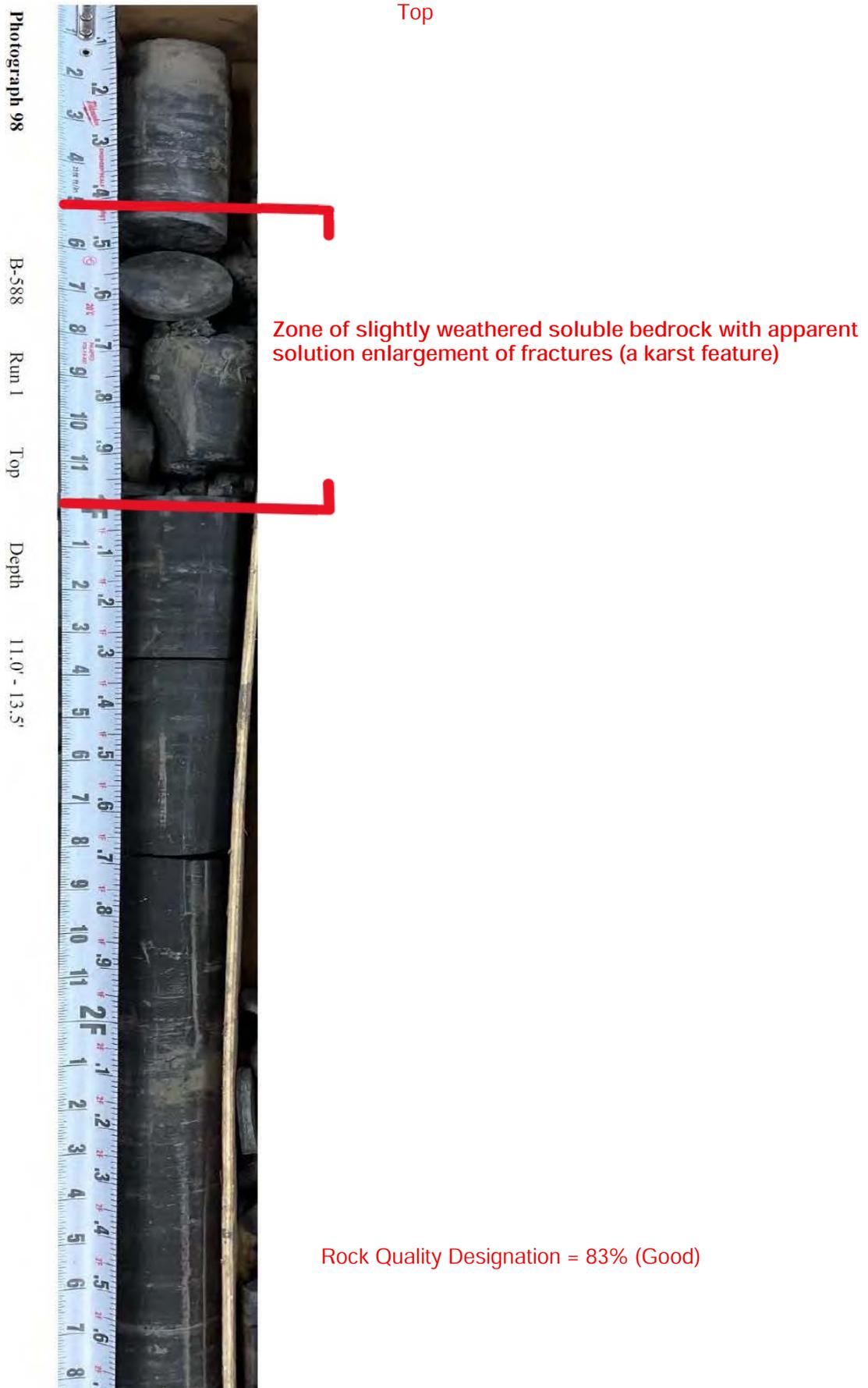


Figure 11 – Example of Unweathered (Fresh) Bedrock Core - Boring B-561 (Bottom of Run 2)

Source: Micron Draft EIS (CPO & OCIDA, 2025), Appendix E-4, Attachments to CME Report No. 28062B-01-0624, modified in red to highlight selected features



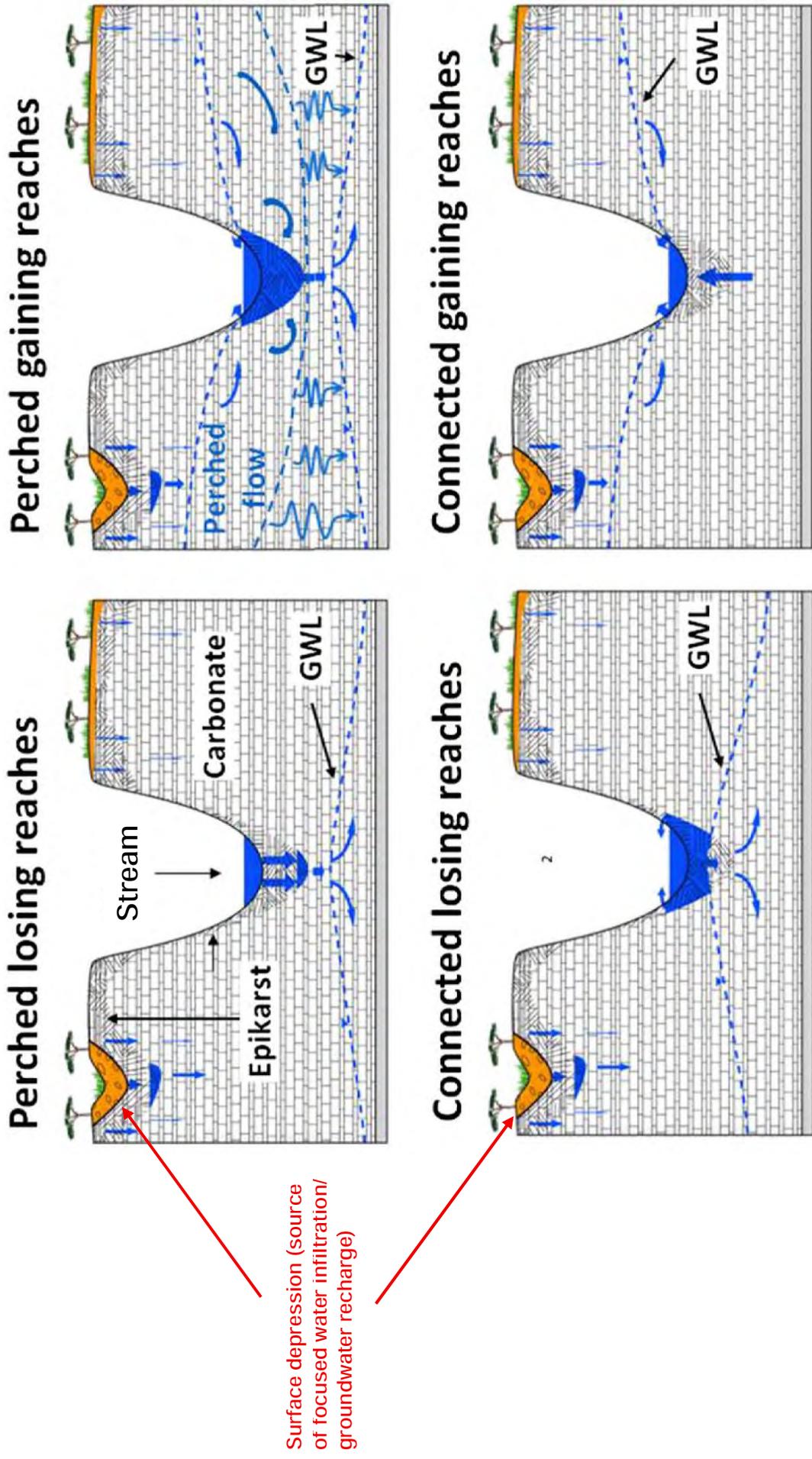
Top

Unweathered bedrock

Rock Quality Designation = 100% (Excellent)

Figure 12 – Diagrams Showing Selected Variations of Surface Water and Groundwater Interactions in Karst

Source: Figure 12, Gutierrez et al. (2014), modified in red to highlight selected features



Surface depression (source of focused water infiltration/ groundwater recharge)

Generalized cross section diagrams illustrating selected variations in gaining, losing, connected, and perched reaches of streams in relation to an underlying karst aquifer. GWL = groundwater level. Perched gaining reaches are typically observed when higher intensity rainfall induces perched groundwater flow due to limited capability of the epiphreatic zone to convey large volumes of water towards the underlying less karstified bedrock. Conversely, connected losing reaches are typically observed when the rainfall intensity is lower. Modified from Figure 12 in Gutierrez et al. (2014).

Figure 13 – Bedrock Removal Locations

Source: Figure 3.2-4, Micron Draft EIS (CPO & OCIDA, 2025), unmodified

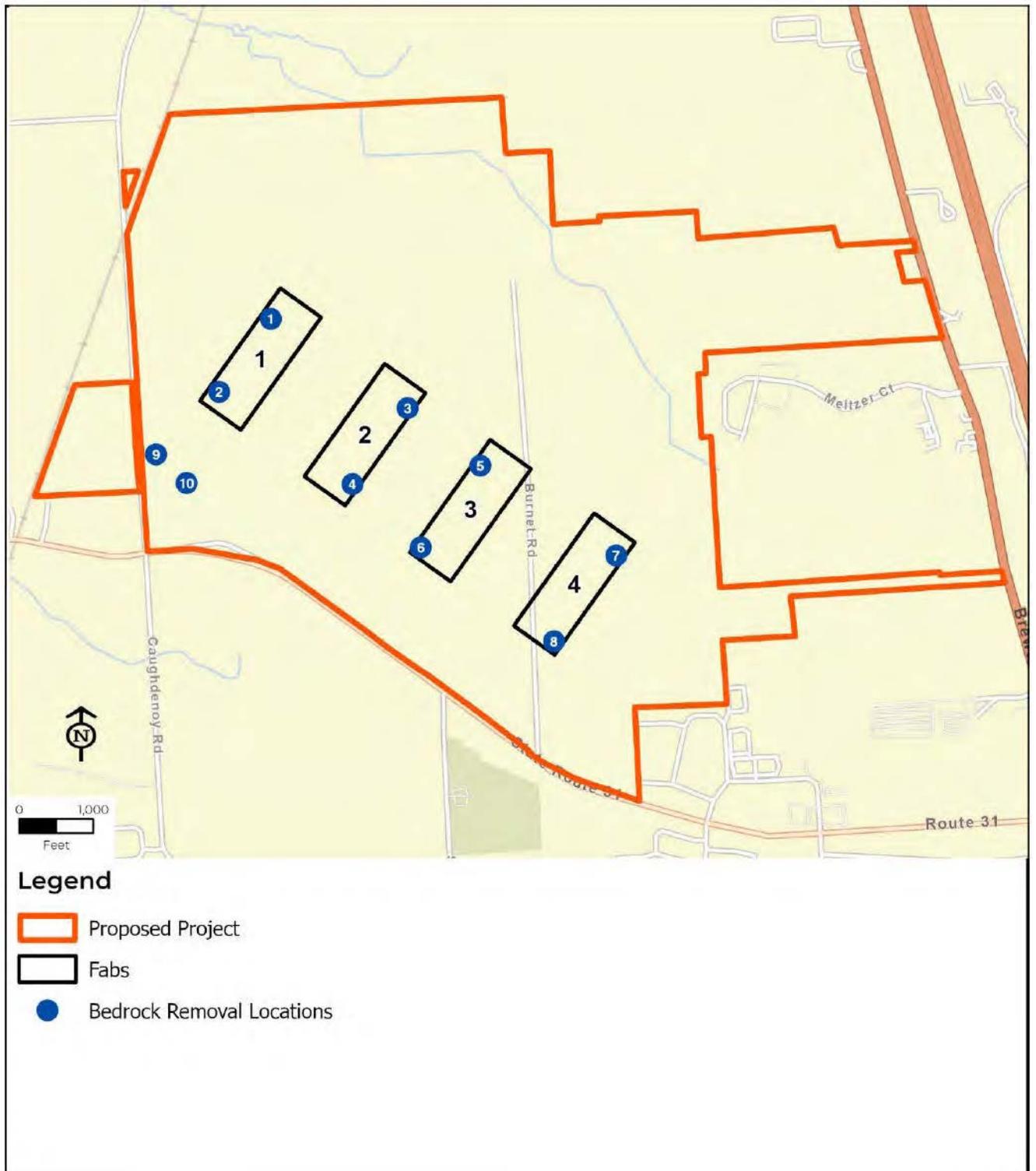


Figure 14 – Water Well Completion Report for Private Water Supply Well OD2031
 Source: DECinfo Locator website (NYSDEC, 2025b), modified with black box to redact well owner's name

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION



(1) COUNTY Onondaga (3) DEC Well Number OD2031
 (2) TOWN Cicero

WATER WELL COMPLETION REPORT

(4) OWNER		(43) LOG Depth to Bedrock <u>8</u> (ft. below ground surface) Ground Elev. <u>426</u> (ft. above S.L.) Top of Casing <u>8"</u> (ft., above (+) or below (-) ground surface)	
(5) ADDRESS <u>Sneller Dr. Cicero</u>			
(6) LOCATION OF WELL (See Instructions On Reverse) (Check here <input type="checkbox"/> if same as address above, also provide Lat / Long below) Show Lat/Long if available and method used: <input checked="" type="checkbox"/> GPS <input type="checkbox"/> Map Interpolation <u>N-43°11.888' W-76°07.551'</u>			
(7) DEPTH OF WELL BELOW LAND SURFACE (feet) <u>39</u>	(8) DEPTH TO GROUNDWATER BELOW LAND SURFACE (feet)	DATE MEASURED	
CASINGS			
(9) DIAMETER <u>6 5/8</u> in. in. in. in.	<div style="border: 1px solid black; padding: 5px; width: fit-content; margin: auto;"> TOP OF WELL hand pan Black lime stone </div>		
(10) LENGTH <u>8</u> ft. ft. ft. in.			
(11) GROUT TYPE / SEALING	(12) GROUT / SEALING INTERVAL (feet) FROM _____ TO _____		
SCREENS			
(13) MAKE & MATERIAL <u>φ</u>	(14) OPENINGS		
(15) DIAMETER in. in. in. in.			
(16) LENGTH ft. ft. ft. in.			
(17) DEPTH TO TOP OF SCREEN, FROM TOP OF CASING (Feet)			
YIELD TEST			
(18) DATE <u>5/5/08</u>	(19) DURATION OF TEST <u>Parts of 2 days</u>		
(20) LIFT METHOD <input type="checkbox"/> Pump <input checked="" type="checkbox"/> Air Lift <input type="checkbox"/> Bail	(21) STABILIZED DISCHARGE (GPM) <u>100</u>		
(22) STATIC LEVEL PRIOR TO TEST (feet/inches below top of casing) <u>6</u>	(23) MAXIMUM DRAWDOWN (Stabilized) (feet/inches below top of casing) <u>bottom</u>		
(24) RECOVERY (Time in hours/minutes) <u>overnight</u>	(25) Was the water produced during the test discharged away from immediate area? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		
PUMP INSTALLATION			
(26) PUMP INSTALLED? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	(27) DATE	(28) PUMP INSTALLER	
(29) TYPE	(30) MAKE	(31) MODEL	
(32) MAXIMUM CAPACITY (GPM)	(33) PUMP INSTALLATION LEVEL FROM TOP OF CASING (Feet)		
(34) METHOD OF DRILLING <input checked="" type="checkbox"/> Rotary <input type="checkbox"/> Cable Tool <input type="checkbox"/> Other _____		(35) USE OF WATER (See instructions for choices) <u>domestic</u>	
(36) DATE DRILLING WORK STARTED <u>5/4/08</u>		(37) DATE DRILLING WORK COMPLETED <u>5/5/08</u>	
(38) DATE REPORT FILED <u>6/08</u>	(39) REGISTERED COMPANY <u>Caster Well</u>	(40) DEC REGISTRATION NO. <u>NYRD 10230</u>	
(41) CERTIFIED DRILLER (Print name) <u>Robin Caster</u>	(42) CERTIFIED DRILLER SIGNATURE <u>[Signature]</u>		
* By signing this document I hereby affirm that: (1) I am certified to supervise water well drilling activities as defined by Environmental Conservation Law §15-1502; (2) this water well was constructed in accordance with water well standards promulgated by the New York State Department of Health; (3) under the penalty of perjury the information provided in this Well Completion Report is true, accurate and complete, and I understand that any false statement made herein is punishable as a class A Misdemeanor under Penal Law §210.45.			
		BOTTOM OF HOLE	
		NYSDEC COPY	

LOCATION SKETCH - Indicate north



Attachment B
Tables

**Summary of Rock Core Data
Micron Draft EIS - Clay, New York**

Boring Designation	Cored Interval(s)	Degree of Weathering	Fractured, Broken, and/or More Weathered Zone Depths (ft)	Core Recovery (%)	Rock Quality Designation (%)
B-13	23.8-28.8	Slight	26.0, 27.1, 28.3	100	Fair (67)
B-15	23.8-28.8	Slight	24.1-24.5	100	Good (85)
B-30	28.8-33.8	Slight	NR	100	Excellent (97)
B-30	7.0-12.0	Moderate	7.0-12.0	100	Very Poor (20)
B-35	4.0-9.0	Weathered	4.4-4.5, 5.1-5.2, 6.8-6.9, 8.1-8.3	100	Fair (65)
B-39	19.0-24.0	Slight	20.3, 21.1, 23.2	100	Good (87)
B-41	4.3-9.3	Slight/Fresh	6.3-6.7	100	Excellent (92)
B-217	21.9-26.9	Moderate	21.9-22.8, 24.5-25.1, 26.1-26.9	98	Poor (37)
B-227	26.9-31.9	Slight	30.4-31.9	100	Poor/Fair (50)
B-227	24.0-29.0	Slight	NR	98	Excellent (95)
B-292	18.5-23.5	ND	19.1, 19.3	100	Good (83)
B-300	23.5-28.5	Moderate	24.8-25.1, 26.3-26.5, 27.0-28.5	100	Poor (47)
B-300	28.0-33.0	Slight	35.7-35.9	100	Good (87)
B-366	33.0-38.0	Sound	NR	100	Excellent (100)
B-400	17.3-22.3	Highly	17.3-18.9, 19.8-20.4	100	Poor (30)
B-400	8.8-13.8	Moderate	10.1, 10.4, 12.4, 12.6	98	Fair (63)
B-426	13.8-18.8	Slight	17.8-18.8	98	Fair/Good (75)
B-511	22.5-27.5	Highly	NR	100	Very Poor (20)
B-511	27.5-32.5	Slight	NR	100	Good (83)
B-518	15.0-20.0	Slight/Moderate	15.6-16.0, 16.5-16.6, 17.3-17.8, 18.1-18.2	70	Very Poor (22)
B-518	20.0-15.0	Slight	20.1-20.2, 20.6-20.8, 21.1-21.2	95	Fair (57)
B-520	14.4-19.4	Slight/Moderate	14.6-15.6, 16.5, 18.0, 18.2, 18.8	93	Poor (38)
B-520	19.4-24.4	Slight/Moderate	19.7-19.8, 20.2, 21.9-22.2	97	Fair (53)
B-523	29.1-34.1	Slight	NR	100	Poor (40)
B-523	34.1-39.1	Slight	25.7-26.4	97	Fair (53)
B-526	7.2-12.2	Slight	9.0, 9.5, 10.8	98	Excellent (97)
B-526	12.2-17.2	Slight	13.9	93	Good (83)
B-526	13.5-18.5	Slight	13.7-14.0, 14.4, 15.3, 15.7	95	Fair (73)
B-526	18.5-23.5	Slight	19.8, 20.7-20.8, 22.4-22.5	98	Good (85)

**Summary of Rock Core Data
Micron Draft EIS - Clay, New York**

Boring Designation	Cored Interval(s)	Degree of Weathering	Fractured, Broken, and/or More Weathered Zone Depths (ft)	Core Recovery (%)	Rock Quality Designation (%)
B-532	24.0-29.0 29.0-34.0	Moderate Slight	24.0-24.9, 26.9 31.4, 33.3, 33.4	92 98	Fair (68) Good/Excellent (90)
B-536	16.0-21.0 21.0-26.0	Slight Slight	16.0-17.2 24.4-24.6	92 95	Fair (70) Fair (53)
B-543	20.2-25.2 25.2-30.2	Slight Slight	22.2, 24.2, 24.7-25.0 25.2-25.4, 25.7, 25.9, 27.3-27.4, 28.8-28.9, 29.1	97 95	Fair (67) Fair (58)
B-544	15.5-20.5 20.5-25.5	Slight Slight	16.4-16.6, 16.7, 17.5-18.5 21.5-21.6, 22.0-22.2	100 100	Poor (40) Good (83)
B-545	25.7-30.7 30.7-35.7	Slight Slight	26.0-26.1, 29.5-29.9 31.8-32.0	100 98	Good (77) Good (83)
B-547	21.0-26.0 26.0-31.0	Slight Slight	21.0-21.2, 21.4, 21.7, 22.6, 23.2, 24.0-24.3 27.9	93 98	Poor (28) Good/Excellent (90)
B-549	25.1-30.1 30.1-35.1	Slight Slight	25.6-25.8, 25.9 NR	95 100	Fair (65) Excellent (100)
B-561	20.4-25.4 25.4-30.4	ND Fresh	NR NR	100 100	Excellent (92) Excellent (100)
B-565	18.0-23.0 23.0-28.0	ND Slight	NR 25.1	100 100	Excellent (100) Good (85)
B-571	9.5-14.5 14.5-19.5	Slight Slight	NR 16.5, 16.7, 16.9, 17.0, 17.2, 17.4-17.5	93 100	Fair (70) Fair (62)
B-585	11.0-16.0 16.0-21.0	Slight/Moderate Slight/Moderate	11.8-12.3, 12.9-13.3, 13.8-14.2, 15.0-15.2 16.7-16.8, 17.2-17.9, 18.7-18.8, 19.3, 19.9-20.0	97 100	Poor (33) Fair (60)
B-588	11.0-16.0 16.0-21.0	Slight Slight	11.4-11.7, 11.9, 14.7, 15.2 NR	100 100	Good (83) Excellent (100)
B-594	19.5-24.5 24.5-29.5	Slight Slight	25.7-25.8, 26.5-26.7 NR	100 100	Poor (48) Fair (72)
B-595	18.6-23.6 23.6-28.6	Slight Slight	NR 24.9, 25.1, 27.0-27.2	98 97	Excellent (93) Good (82)
B-602	21.8-26.8	Moderate	22.0-22.2, 22.2-23.0, 23.2, 23.5-24.0, 24.3-24.6, 26.4-26.8	100	Very Poor (22)

**Summary of Rock Core Data
Micron Draft EIS - Clay, New York**

Boring Designation	Cored Interval(s)	Degree of Weathering	Fractured, Broken, and/or More Weathered Zone Depths (ft)	Core Recovery (%)	Rock Quality Designation (%)
B-602	26.8-31.8	Slight/Moderate	27.0-27.1, 27.5-27.6, 27.8-28.3, 28.4-28.5, 28.8-29.0, 29.6-30.0	95	Poor (28)
B-604	25.0-30.0	Slight	25.2-25.3	100	Excellent (98)
B-612	30.0-35.0	Slight	30.7, 30.8, 31.0, 31.3, 34.5, 34.7	100	Fair (63)
B-616	23.6-28.6	Moderate	24.1-27.4	90	Very Poor (12)
B-624	28.6-33.6	Slight/Moderate	30.4-30.5, 31.2-31.3, 31.4, 31.9, 32.3-32.4, 33.2-33.3	100	Fair (55)
B-625	24.2-29.2	Slight	NR	100	Excellent (97)
B-630	29.2-34.2	Slight	31.3, 31.8	100	Excellent (97)
B-632	24.1-29.1	Slight	25.4, 25.6	98	Poor (37)
B-664	29.1-34.1	Slight	32.1, 32.2	100	Good (78)
B-669	16.0-21.0	Slight/Moderate	16.7, 17.7, 17.8, 18.2, 18.3, 18.6, 18.7, 19.1, 19.2, 19.4, 19.5-20.3	100	Very Poor (17)
B-675	21.0-26.0	Slight/Moderate	21.3, 21.5, 22.3, 24.9, 25.3, 25.5, 25.6, 25.8	100	Poor (42)
B-688	22.0-27.0	Slight	22.8	95	Fair (72)
B-688	27.0-32.0	Slight	NR	95	Excellent (95)
B-688	22.0-27.0	Slight	23.1	100	Excellent (95)
B-688	27.0-32.0	Slight	27.4, 27.6	93	Good (87)
B-688	25.1-30.1	Slight	25.5	98	Good (80)
B-688	30.1-35.1	Slight	30.3	98	Excellent (93)
B-688	13.2-18.2	Slight	13.9, 14.1, 14.8	98	Good (80)
B-688	18.2-23.2	Slight	18.9, 19.1, 21.0, 21.6-21.7	98	Good (80)
B-688	10.5-15.5	Slight	11.0, 11.6	90	Good/Excellent (90)
B-688	15.5-20.5	Slight	19.4	100	Excellent (97)
B-688	16.0-21.0	Slight	17.6-17.8, 18.6, 19.8	97	Fair (60)
B-688	21.0-26.0	Slight	20.2	93	Good (78)

Notes:

All data listed in this table are from CME boring logs contained in Appendix E-4 of the Draft EIS (CPO & OCIDA, 2025)

All intervals or depths are reported in feet below ground surface

Reported bedrock lithology is substantially similar in all rock cores (typically gray to black dolostone, sometimes with interbedded shale)

NR = none reported

ND = not described

**Summary of Rock Core Data
Micron Draft EIS - Clay, New York**

Boring Designation	Cored Interval(s)	Degree of Weathering	Fractured, Broken, and/or More Weathered Zone Depths (ft)	Core Recovery (%)	Rock Quality Designation (%)
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Bold depths = reported as horizontal fractures (typically along bedding planes)

Additional Observations from Rock Cores Suggesting Karst Features
Micron Draft EIS - Clay, New York

Boring Designation	Cored Interval(s)	Degree of Weathering	Additional Observations* Suggesting Possible Karst Features	Core Recovery (%)	Rock Quality Designation (%)
B-129	29.8-34.8	Slight	1.9 feet of no recovery, possible subsurface void from 32.9-34.8	62	ND
B-217	21.9-26.9 26.9-31.9	Moderate Slight	Drilling water lost to formation (no return water) Drilling water lost to formation (no return water)	98 100	Poor (37) Poor/Fair (50)
B-292	18.5-23.5 23.5-28.5	ND Moderate	Drilling water lost to formation @ 19.5 (no return water) Silt seams** ; drilling water lost to formation (no return water)	100 100	Good (83) Poor (47)
B-511	15.0-20.0 20.0-15.0	Slight/Moderate Slight	Silt seams** and weathered rock fragments @ 15.5-15.6 and 18.2-18.4 Void with calcite crystals @ 21.6-21.7	70 95	Very Poor (22) Fair (57)
B-520	29.1-34.1 34.1-39.1	Slight Slight	Silt seam** @ 29.3 Silt seams** @ 36.5-36.7	100 97	Poor (40) Fair (53)
B-545	25.7-30.7 30.7-35.7	Slight Slight	Silt seams** @ 26.8-27.1 Calcite deposit @ 34.2	100 98	Good (77) Good (83)
B-549	25.1-30.1 30.1-35.1	Slight Slight	Silt seam** @ 27.8 NR	95 100	Fair (65) Excellent (100)
B-571	9.5-14.5 14.5-19.5	Slight Slight	Silt seams** @ 10.5-10.7, 11.9, 12.8, 12.9, 13.0 Calcite veins @ 18.8, 19.3-19.4	93 100	Fair (70) Fair (62)
B-594	19.5-24.5 24.5-29.5	Slight Slight	Silt seam** @ 19.8 NR	100 100	Poor (48) Fair (72)
B-595	18.6-23.6 23.6-28.6	Slight Slight	Silt seam** @ 23.0 NR	98 97	Excellent (93) Good (82)
B-602	21.8-26.8 26.8-31.8	Moderate Slight/Moderate	Silt seams** with weathered rock fragments @ 25.8-26.0 Silt seams** with weathered rock fragments @ 28.6-28.8	100 95	Very Poor (22) Poor (28)
B-616	24.2-29.2 29.2-34.2	Slight Slight	Silt seam** @ 24.4 NR	100 100	Excellent (97) Excellent (97)
B-624	24.1-29.1 29.1-34.1	Slight Slight	Clay seam** @ 25.0 Clay seam** @ 29.1	98 100	Poor (37) Good (78)
B-630	22.0-27.0 27.0-32.0	Slight Slight	NR Silt seam** @ 29.3	95 95	Fair (72) Excellent (95)

Additional Observations from Rock Cores Suggesting Karst Features

Micron Draft EIS - Clay, New York

Boring Designation	Cored Interval(s)	Degree of Weathering	Additional Observations* Suggesting Possible Karst Features	Core Recovery (%)	Rock Quality Designation (%)
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Notes:

All data listed in this table are from CME boring logs contained in Appendix E-4 of the Draft EIS (CPO & OCIDA, 2025)

All intervals or depths are reported in feet below ground surface

Reported bedrock lithology is substantially similar in all rock cores (typically gray to black dolostone, sometimes with interbedded shale)

* This column notes observations other than (in addition to) any fractures or broken zones listed in Table 1 with weathering or evidence of solution enlargement

** Silt (or other unconsolidated material) within rock cores may represent sedimentation by turbulent water flow (i.e., a karst conduit)

NR = none reported

ND = not described

Attachment C
Acronyms and Abbreviations

**ATTACHMENT C
ACRONYMS AND ABBREVIATIONS**

ASTM	ASTM International (formerly known as the American Society for Testing and Materials)
CAFOs	Concentrated Animal Feeding Operations
CHIPS	Creating Helpful Incentives to Produce Semiconductors
CPO	CHIPS Program Office
CPS	Conservation Practice Standard
CSM	Conceptual Site Model
DER	Division of Environmental Remediation
DOW	Division of Water
EIS	Environmental Impact Statement
Esq.	Esquire
FoxPG	Fox Professional Geology, PLLC
gpm	gallons-per-minute
ITRC	Interstate Technology and Regulatory Council
LiDAR	Light Distance and Ranging
NIST	National Institutes of Health
NOAA	National Oceanic and Atmospheric Administration
NRCS	Natural Resources Conservation Service
NYSDEC	New York State Department of Environmental Conservation
NYSDOH	New York State Department of Health
NYSDOT	New York State Department of Transportation
NYSGS	New York State Geological Survey
OCDEM	Onondaga County Department of Emergency Management
OCDWEP	Onondaga County Department of Water Environment Protection
OCIDA	Onondaga County Industrial Development Agency
OCWA	Onondaga County Water Authority
P.E.	Professional Engineer
P.G.	Professional Geologist
pH	potential of Hydrogen
PFAS	Per- and polyfluoroalkyl Substances
PLLC	Professional Limited Liability Company
RQD	Rock Quality Designation
SEQR	State Environmental Quality Review Act
SOCPA	Syracuse-Onondaga County Planning Agency
SPDES	State Pollutant Discharge Elimination System
SVOCs	Semivolatile Organic Compounds
TDS	Total Dissolved Solids
TMAH	Tetramethylammonium Hydroxide
TOF	Total Organic Fluorine
TOGS	Technical and Operational Guidance Series
TOP	Total Oxidizable Precursors
TRA	Trinity River Authority
TSS	Total Suspended Solids
USDA	United States Department of Agriculture
USEPA	United States Environmental Protection Agency
USGS	United States Geological Survey
VOCs	Volatile Organic Compounds

Attachment D
References Cited

- Ailing, H.L., 1928. The geology and origin of the Silurian salt in New York State. New York State Museum and Science Service, Bulletin 275, 139 pp.
- ASTM, 2017. Standard Test Method for Determining Rock Quality Designation (RQD) of Rock Core. ASTM Standard D6032/D6032M – 17, ASTM International, West Conshohocken, Pennsylvania.
- ASTM, 2020. Standard Guide for Selecting Surface Geophysical Methods. ASTM Standard D6429 – 20, ASTM International, West Conshohocken, Pennsylvania.
- ASTM, 2023. Standard Practice for Preliminary Karst Terrain Assessment for Site Development. ASTM Standard D8512 – 23, ASTM International, West Conshohocken, Pennsylvania.
- CPO & OCIDA, 2025. Draft Environmental Impact Statement for the Micron Semiconductor Manufacturing Project, Clay, New York. Document Number EISX-006-55-CPO-001, June 2025.
- Engelder, T., 1982. Is there a genetic relationship between selected regional joints and contemporary stress within the lithosphere of North America? *Tectonics*, Vol. 1, pp. 161-177.
- Fox, J.S., DiFrancesco, N.J., Slater, B., and Friedman, R., 2022. Mineralogical and Geochemical Characterization of the Upper Silurian Syracuse Formation and Adjacent Formations in Central New York State. New York State Council of Professional Geologists Continuing Education Course Number 2022-039, Geology Days 2022 Conference, Saratoga Springs, New York, October 2022.
- Gutierrez, F., Parise, M., De Waele, J., and Jourde, H., 2014. A review on natural and human-induced geohazards and impacts in karst. *Earth-Science Reviews*, Vol. 138, pp. 61-88.
- ITRC, 2023. Per- and Polyfluoroalkyl Substances (PFAS) Technical and Regulatory Guidance Document. Interstate Technology and Regulatory Council website, PFAS home page, Section 11.2 - Sampling and Analysis Methods, https://pfaa-1.itrcweb.org/11-sampling-and-analytical-methods/#11_2, published September 2023, accessed 3 August 2025.
- Kappel, W.M., Reddy, J.E., and Root, J., 2020. Statewide Assessment of Karst Aquifers in New York With an Inventory of Closed-Depression and Focused-Recharge Features. United States Geological Survey Scientific Investigations Report 2020–5030, 74 pp.
- NOAA, 2025. Onondaga County, New York precipitation, 1895 through 2024. National Oceanic and Atmospheric Administration, National Centers for Environmental information, Climate at a Glance: County Time Series, <https://www.ncei.noaa.gov/access/monitoring/climate-at-a-glance/county/time-series>, accessed 21 July 2025.
- NIST, 2024. Final programmatic environmental assessment for modernization and expansion of existing semiconductor fabrication facilities under the CHIPS Incentives Program. United States Department of Commerce, National Institute of Standards and Technology CHIPS Program Office, Washington, D.C., 28 June 2024.
- NRCS, 2022. Chapter 31 – Groundwater Investigations. Title 210 - National Engineering Handbook, Part 631 Geology, 210-631-H, 2nd Ed., United States Department of Agriculture, Natural Resources Conservation Service, March 2022.

- NYSDEC, 1990. Primary and Principal Aquifer Determinations. New York State Department of Environmental Conservation Division of Water Technical and Operational Guidance Series Memorandum Number 2.1.3, Albany, October 1990.
- NYSDEC, 1998. Implementation of the NYSDEC Antidegradation Policy – Great Lakes Basin (Supplement to Antidegradation Policy issued September 9th, 1985). New York State Department of Environmental Conservation, Division of Water, Technical and Operational Guidance Series Memorandum 1.3.9, Albany, February 1998, 14 pp.
- NYSDEC, 2010. DER-10: Final Technical Guidance for Site Investigation and Remediation. New York State Department of Environmental Conservation, Division of Environmental Remediation, Albany, May 2010 (errata sheet last revised April 2019).
- NYSDEC, 2025a. NYSDEC State Environmental Quality Review Act website homepage, <https://dec.ny.gov/regulatory/permits-licenses/seqr>, accessed 17 July 2025.
- NYSDEC, 2025b. Water Well Completion Report for private water supply well designation OD2031, Town of Cicero, Onondaga County, New York. DECinfo Locator website, <https://gisservices.dec.ny.gov/gis/dil/index.html?cat=LR>, accessed 8 July 2025.
- NYS DOT, 1989. Brewerton, New York Quadrangle. New York State Department of Transportation, 7.5 Minute Series (Scale 1:24,000), Albany.
- OCWA, 2025. Lake Ontario and the Metropolitan Water Board. OCWA Water Distribution System website, <https://www.ocwa.org/2020/10/07/ocwa-distribution-system/>, accessed 27 July 2025.
- Pagano, T.S., Terry, D.B., and Ingram, A.W., 1986. Geohydrology of the glacial-outwash aquifer in the Baldwinsville area, Seneca River, Onondaga County, New York. United States Geological Survey Water-Resources Investigations Report 85-4094, 7 sheets, scale 1:24,000.
- Palmer, A.N., 2007. Cave geology. Cave Books (Cave Research Foundation), Dayton, 454 pp.
- Palmer, A.N., Rubin, P.A., and Palmer, M.V., 1991. Interaction between karst and glaciation in the Helderberg Plateau, Schoharie and Albany counties, New York. In: Ebert, J.R. (Ed.), *New York State Geological Association 63rd Annual Meeting Field Trip Guidebook*, SUNY Oneonta, pp. 161-173.
- Richardson, J.J., 2020. Regulation of large dairy farms in karst regions of the United States. National Cave and Karst Research Institute Symposium 8: *Proceedings of the 16th Multidisciplinary Conference on Sinkholes and the Engineering and Environmental Impacts of Karst*; Land, L., Kromhout, C., and Byle, M.J. (Eds.), pp. 40-47.
- Rickard, L.V., 1969. Stratigraphy of the Upper Silurian Salina Group, New York, Pennsylvania, Ohio, Ontario. New York State Museum and Science Service, Map and Chart Series Number 12, Albany, 57 pp.
- Rickard, L.V., and Fisher, D.W., 1970. Bedrock Geologic Map of New York - Finger Lakes Sheet. New York State Museum and Science Service Map & Chart Series Number 15, Albany.

- Rubin, P.A., 2009. Geological evolution of the Cobleskill Plateau, New York State, USA. *Proceedings of the 15th International Congress on Speleology*, July 2009, Vol. 2, pp. 972-978.
- SOCPA & OCDEM, 2019. Final Onondaga County Multi-Jurisdictional Hazard Mitigation Plan Update, Volume 1, Section 5.4.4 – Risk Assessment: Hazard Profiles and Vulnerability Assessment for Geologic Hazards. Syracuse-Onondaga County Planning Agency and Onondaga County Department of Emergency Management, April 2019.
- Taylor, C.J. and Greene, E.A., 2008. Hydrogeologic characterization and methods used in the investigation of karst hydrology; Chapter 3 in: *Field Techniques for Estimating Water Fluxes Between Surface Water and Ground Water* (Eds. Rosenberry, D. O. and LaBaugh, J.W.), United States Geological Survey Techniques and Methods Report 4-D2, 135 pp.
- Town of Clay, 2025. Town of Clay website homepage, <https://townofclay.org/>, accessed 14 July 2025.
- TRA, 2025. TMAH Guidance on Prohibition. Trinity River Authority, Arlington, Texas; accessed via the Public Works Utility Operations website of the City of North Richland Hills, <https://www.nrhtx.com/899/Utility-Operations>, accessed 27 July 2025.
- Treesh, M.I. and Friedman, G.M., 1974. Sabkha deposition of the Salina Group (Upper Silurian) of New York State. *Proceedings of the Fourth International Symposium on Salt*, Northern Ohio Geological Society, Cleveland, pp. 35-46.
- USEPA, 2022. Electrical and Electronic Components (40 CFR Part 469) Detailed Study Report. United States Environmental Protection Agency, Office of Water, Report EPA-821-R-22-005, DCN 11197, 108 pp.
- Veni, G., 1999. A geomorphological strategy for conducting environmental impact assessments in karst areas. *Geomorphology*, Vol. 31, pp. 151-180.
- Zhao, M. and Jacobi, R.D., 1997. Formation of regional cross-fold joints in the northern Appalachian Plateau. *Journal of Structural Geology*, Vol. 19, pp. 817-834.

From: Emily Harcourt <emharcourt@gmail.com>
Sent: Sunday, August 10, 2025 7:30 PM
To: chipsnepa@chips.gov
Subject: [EXTERNAL] Comments on DEIS for Micron Semiconductor Manufacturing Project

To whom it may concern:

I am writing to submit comments on the draft environmental impact statement for the Micron semiconductor manufacturing project proposed in Clay, NY. I am a professor of chemistry at Le Moyne College in Syracuse, NY and a resident of Syracuse. I also row on Onondaga Lake and the Seneca River. The Micron semiconductor manufacturing project presents an exciting economic opportunity. However, residents of this area are well aware of the negative environmental impacts that can result from industrial development, as evidenced by the long history of Allied Chemical and its predecessors polluting Onondaga Lake. The Micron project is enormous in scale; it is of the utmost importance that environmental and other impacts are fully and thoughtfully addressed both before the project begins and throughout the lifetime of the facility so that the project not only provides economic benefits but also minimizes environmental impacts and contributes to a healthy, sustainable future for all in this region.

While the DEIS is vast, there are a number of elements that are not adequately addressed. Those that are of most concern to me are the following:

Plans for (renewable) energy use and GHG emissions. When operational, Micron is expected to consume ~5% of all the energy in the state of New York. Greenhouse gas emissions will be ~4.7 million CO₂ equivalents, equivalent to 29.5% of New York's 2022 industrial sector emissions (Section 3.3). Under the Green CHIPS act, Micron must utilize 100% renewable energy. The DEIS indicates that Micron will "Install on-site renewable energy systems and onsite battery storage systems to supplement the Proposed Project's energy supply to the extent practicable," and otherwise "reduce its Scope 2 emissions by purchasing 100 percent carbon-free electricity utilizing power purchase agreements and renewable energy credits for the power consumption of the Micron Campus." Given the incredible energy use expected for this project, renewable energy credits do not seem sufficient. Micron has not demonstrated that these credits will be available in New York and not already committed to other users. Although there are uncertainties, the DEIS should provide more detail on the energy that will be produced on-site, and provide alternatives for GHG emission mitigation such as additional construction of renewable energy sites.

Transportation plans. The construction of the Micron facility will lead to significant traffic increases, and all of the proposed mitigation plans involve roadway improvements (3.11.3.4). In line with the goals of the CHIPS Act and the Green CHIPS Act, alternative transportation solutions and traffic mitigation measures such as buses, bicycle lanes, and incentives for carpooling should be considered. These measures could also allow the size of the parking lot to be decreased, decreasing other environmental impacts, as well as indirect CO₂ emissions.

Plans for dealing with waste and hazardous substances. The DEIS does not specify the specific fluorinated chemicals that will be used and their quantities. While monitoring of PFOA and PFOS are specified in the DEIS (3.8.3.2), many other fluorinated compounds are used in the semiconductor industry,^[1] and they are likely to have significant environmental and health impacts. Micron should commit to monitoring and limiting all fluorinated compounds in wastewater, solid waste, and gases emitted.

There are concerns about the ability of Onondaga County to deal with the waste generated due to recent failures; a new \$23 million sewage treatment building is not operational due to toxic air quality.^[2] Most of the waste will be shipped off-site by contracted waste handlers. The sites of this waste and environmental justice impacts should be addressed.

Wetland destruction and restoration plans. The DEIS reports the permanent loss of ~200 acres of wetlands. The proposed mitigation is the restoration of 422 acres of wetlands. The proposed mitigation ratio is near the minimum required (Table 3.3-13). The proposed wetlands for restoration are not contiguous. Restored wetlands take years to develop, are, on average, not as productive as original wetlands, and may not be effective in the same ecosystem services.^[3] Additionally, more than 193.4 acres of wetlands may ultimately be degraded at the original site due to the large increase in impervious surfaces nearby, as laid out in Section 3.3.4.2 of the DEIS, even if BMPs and SMPs for stormwater are implemented. Micron should preserve and restore larger and more contiguous sections of wetlands to more effectively offset those that they will destroy.

Finally, with such a huge project incurring large impacts on the environment and the economy and with significant potential impacts for human health, I hope Micron will be transparent and inclusive in developing and sharing the details of the project and of mitigation strategies. Engaging local experts and communities will help to ensure that all aspects are considered and that the benefits of the project (not just the negative impacts) are spread equitably to those already living in the area.

Thank you for your consideration,

Emily Harcourt, Ph.D.

^[1] Ober, C.K.; Kafer, F.; Deng, J. Review of essential use of fluorochemicals in lithographic patterning and semiconductor processing. 2022. *Journal of Micro/Nanopatterning, Materials, and Metrology*. 21:010901. <https://doi.org/10.1117/1.JMM.21.1.010901>

^[2] <https://www.syracuse.com/news/2025/07/the-air-is-so-toxic-in-onondaga-countys-new-23-million-sewage-building-that-workers-cant-go-inside.html>

^[3] Moreno-Mateos, D.; Pwer, M.E.; Comin, F.A.; Yockteng, R. Structural and functional loss in restored wetland ecosystems. 2012. *PLOS Biology*. <https://doi.org/10.1371/journal.pbio.1001247>

From: AMK-MLP@twcny.rr.com
Sent: Sunday, August 10, 2025 10:29 AM
To: 'CHIPSNEPA@chips.gov'
Subject: [EXTERNAL] Micron project

I am writing to voice my concerns regarding the micron plans to build four computer chip factories at the corner of Route 31 and Caughdenoy Road. I am a life time resident of the Syracuse area and currently reside off Caughdenoy Road near the proposed factory site. I echo the concerns voiced at the public hearing at Liverpool High School regarding traffic, noise, air quality especially emissions of forever chemicals. On the environmental concerns flooding already exist and with this project it would exacerbate our current situation. We have septic systems and some residents still have well water. The disruption of natural run off will increase are flooding and cause contamination of drinking water and compromise are waste systems. Having public sewage systems in place for the current residents to secure our health and well being as well as for future home development in the area. would help resolve some of this problem. I believe that with all the new technology, co-operation and commitment of all parties involved this could be an asset to the community showing when we all work together good things can happen. Sincerely, AnnMarie Kazmirski
residing at 4781 Becker Road Brewerton NY

From: Peter King <pking271@pm.me>
Sent: Sunday, August 10, 2025 11:59 PM
To: chipsnepa@chips.gov
Subject: [EXTERNAL] Micron in Clay, NY comments, Moving People Transport Coalition
Attachments: Micron DEIS comments_Moving-People.docx

Hello CHIPS Program Office ,

I submit here, comments on the Micron Project in Clay, NY from Moving People Transport Coalition in Syracuse, NY.

Moving People is submitting these comments now, but we would like to know if revisions and further comments could be accepted tomorrow Aug.

11th.

Best regards,

Peter King for Moving People Transport Coalition, Syracuse, NY.

August 8, 2025

Onondaga County Industrial Development Agency (OCIDA)
ATTN: Micron Project
335 Montgomery Street, Floor 2M
Syracuse, NY 13202

To whom it may concern:

On behalf of the Moving People Transportation Coalition, I submit the following comments regarding the Micron Semiconductor Manufacturing Project, Clay, NY, Draft Environmental Impact Statement. Moving People Transportation Coalition advocates for a sustainable and equitable regional transportation system that prioritizes pedestrians, public transportation, and micromobility.

MPTC is particularly concerned with the environmental harms related to increased vehicle miles travelled (VMT) predicted in the DEIS. The DEIS predicts that the Micron project will increase regional VMT by 67 million miles travelled annually by 2041 (*DEIS Table 3.7-12, p.3-208*). This increase will result in additional greenhouse gas pollution including over 16,000 additional metric tons of CO₂ equivalent (CO₂e) emitted annually by 2041, and over 22,500 tons CO₂e as considering Upstream Fuel Production and Transport (*Ibid.*). Increased VMT will also impose broader costs on the region including increased flood risk due to expanded impermeable surface area, worsening congestion, and additional traffic fatalities. For these reasons, local planning efforts including the City of Syracuse's Vision Zero initiative, Syracuse Metropolitan Transportation Council's Metropolitan Transportation Plan, and Onondaga County's Comprehensive Plan all aim to reduce VMT, and in that context, the anticipated increase in regional VMT expected to be caused by the Micron project requires substantial mitigation.

The DEIS proposes no mitigation for increased VMT. The DEIS considers VMT as a potential cause of traffic congestion in the immediate area of the project site and proposes a series of road widenings to mitigate that congestion. However, the DEIS anticipates that these proposed mitigations will actually increase VMT by ~1 million miles annually by 2041 even while maintaining acceptable levels of service on the identified vehicle routes (*Comment on Table 3.7-12 Regional Mobile Source VMT, and Sec. 3.11.3.4*). The proposed mitigations, then, will worsen the other environmental harms associated with increased VMT including increased traffic fatalities and surface runoff. The DEIS touches briefly on traffic safety, but avoids mentioning potential flood risks from increasing paved surface area (*Comment on Sec.'s 3.11.3.9 Safety, 3.11.3.4 Analysis of Recommended Mitigations and 3.11.4 Summary of Impacts*).

A better measure would mitigate traffic congestion *and* other environmental harms caused by increased VMT, by addressing VMT directly. Although Micron will inevitably attract more vehicles to the area, there is ample opportunity to mitigate VMT by encouraging mode shift. The DEIS predicts that Micron will only generate 80 bus trips and 80 bicycle trips daily.

Each of these figures could be improved by implementing a Transportation Demand Management (TDM) plan after Micron begins regular operation. Such a plan would encourage people travelling to the site—both employees and visitors—to arrive by some means other than driving themselves alone.

Micron can provide incentives for people who arrive by bus, bike, or who carpool to decrease VMT by reducing the total number of cars driving to and from the site. Measures could include providing more convenient parking spaces for carpools, charging for onsite parking, reimbursing bus fare, providing vouchers for the purchase of ebikes, and coordinating with Centro to subsidize useful bus service at shift changes. (*Comment on Sec. 3.11, Transportation*).

Furthermore, Micron's TDM planning needs to include more than the limited agency stakeholders named in their proposed transportation mitigation plan, by collaborating with more local transportation and planning stakeholders. Micron broadly names New York State Dept. of Transportation (NYSDOT) and Onondaga County Dept. of Transportation (OCDOT), and the Towns of Clay and Cicero Planning Boards as "Involved agencies" (*Table 1.2-1*). However, Micron's transportation footprint will affect a wider area and more stakeholder groups than those agencies represent. Micron's TDM should include Centro, Syracuse Metropolitan Transportation Council (SMTC), and other local planning departments, agencies as applicable for TDM planning. Micron's TDM should be adaptive, based in stakeholders openly sharing data and reassessing methods for meeting TDM goals, including traffic safety and reducing VMT. (*Comment on Sec. 3.11, Transportation, 1.2.2 Participating Agencies and Entities*).

Measures such as these would fulfill the requirements identified in the NYS Green CHIPS program to "plan for supporting public transportation or alternative transportation options for employees" including "measures supporting smart growth, integrating facilities into public transportation services, and providing incentives for businesses to accommodate non-vehicular commuting, including employee-based trip reduction programs, low/no-cost transit passes for employees, micro-transit options for employees, ride-sharing programs, bike-sharing, and scooter-sharing; and cycling accommodations." (*Green CHIPS Sustainability Plan Template, from NYS Empire State Development*). (*Comment on 1.1.2 Micron Purpose and Need, Table 1.2-1 State and Local Involved and Interested Agencies*).

These measures will also reduce the need for surface parking at the site—the DEIS anticipates an unreasonable 12,000 parking spaces which will destroy wetlands and increase runoff—and it will further reduce indirect VMT increases by eliminating the need for proposed road widenings (*Comment on Sec.3.3 Water Resources, > 3.3.4.2 Preferred Action Alternative*)

There is still a need for further mitigation measures to address the regional increase in VMT predicted to result from the Micron project. Micron, the New York State Department of Transportation and Onondaga County should mitigate the growth-induced effects of increased VMT by building regionally significant bike and pedestrian infrastructure, expanding access to ebikes and other micromobility devices, and improving public transportation service across the region (*Comment on Sec. 3.11, Transportation*).

Sincerely,

/s/ Alex Lawson

Alex Lawson

Steering Committee Chair

Moving People Transportation Coalition

From: Alex Lawson <alexander.m.lawson@gmail.com>
Sent: Sunday, August 10, 2025 10:37 PM
To: chipsnepa@chips.gov
Subject: [EXTERNAL] Micron 2025 DEIS comments
Attachments: Micron DEIS comments.pdf

Please find attached comments submitted in response to the Micron 2025 Draft Environmental Impact Statement.

Sincerely,
Alex Lawson

August 8, 2025

Onondaga County Industrial Development Agency (OCIDA)

ATTN: Micron Project

335 Montgomery Street, Floor 2M

Syracuse, NY 13202

To whom it may concern:

On behalf of the Moving People Transportation Coalition, I submit the following comments regarding the Micron Semiconductor Manufacturing Project, Clay, NY, Draft Environmental Impact Statement. Moving People Transportation Coalition advocates for a sustainable and equitable regional transportation system that prioritizes pedestrians, public transportation, and micromobility.

MPTC is particularly concerned with the environmental harms related to increased vehicle miles travelled (VMT) predicted in the DEIS. The DEIS predicts that the Micron project will increase regional VMT by 67 million miles travelled annually by 2041. This increase will result in additional greenhouse gas pollution including over 16,000 additional tons of CO₂ equivalent emitted annually by 2041. Increased VMT will also impose broader costs on the region including increased flood risk due to expanded impermeable surface area, worsening congestion, and additional traffic fatalities. For these reasons, local planning efforts including the City of Syracuse's Vision Zero initiative, Syracuse Metropolitan Transportation Council's Metropolitan Transportation Plan, and Onondaga County's Comprehensive Plan all aim to reduce VMT, and in that context, the anticipated increase in regional VMT expected to be caused by the Micron project requires substantial mitigation.

The DEIS proposes no mitigation for increased VMT. The DEIS considers VMT as a potential cause of traffic congestion in the immediate area of the project site and proposes a series of road widenings to mitigate that congestion. However, the DEIS anticipates that these proposed mitigations will actually increase VMT by 1 million miles annually by 2041 even while maintaining acceptable levels of service on the identified vehicle routes. The proposed mitigations, then, will worsen the other environmental harms associated with increased VMT including increased traffic fatalities and surface runoff.

A better measure would mitigate traffic congestion *and* other environmental harms caused by increased VMT by addressing VMT directly. Although Micron will inevitably attract more vehicles to the area, there is ample opportunity to mitigate VMT by encouraging mode shift. The DEIS predicts that Micron will only generate 80 bus trips and 80 bicycle trips daily.

Each of these figures could be improved by implementing a Transportation Demand Management (TDM) plan after Micron begins regular operation. Such a plan would encourage people travelling to the site—both employees and visitors—to arrive by some means other than driving themselves alone. Micron can provide incentives for people who arrive by bus, bike, or

who carpool to decrease VMT by reducing the total number of cars driving to and from the site. Measures could include providing more convenient parking spaces for carpools, charging for onsite parking, reimbursing bus fare, providing vouchers for the purchase of ebikes, and coordinating with Centro to subsidize useful bus service at shift changes. The TDM plan should be adaptive, by responding to ongoing data collection and reassessment by all stakeholders for meeting TDM goals, including traffic safety and reducing VMT.

Measures such as these would fulfill the requirements identified in the NYS Green CHIPS program to “plan for supporting public transportation or alternative transportation options for employees” including “measures supporting smart growth, integrating facilities into public transportation services, and providing incentives for businesses to accommodate non-vehicular commuting, including employee-based trip reduction programs, low/no-cost transit passes for employees, micro-transit options for employees, ride-sharing programs, bike-sharing, and scooter-sharing; and cycling accommodations.”

These measures will also reduce the need for surface parking at the site—the DEIS anticipates an unreasonable 12,000 parking spaces which will destroy wetlands and increase runoff—and it will further reduce indirect VMT increases by eliminating the need for proposed road widenings.

There is still a need for further mitigation measures to address the regional increase in VMT predicted to result from the Micron project. Micron, the New York State Department of Transportation and Onondaga County should mitigate the growth-induced effects of increased VMT by building regionally significant bike and pedestrian infrastructure, expanding access to ebikes and other micromobility devices, and improving public transportation service across the region.

Sincerely,

/s/ Alex Lawson

Alex Lawson

Steering Committee Chair

Moving People Transportation Coalition

From: Christopher Minardi <chrisminardi@icloud.com>
Sent: Sunday, August 10, 2025 8:56 PM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Micron Project

Hello my name is Chris Minardi, my address is 5108 Old Barn Rd, Clay NY 13041. I am against Micron for three main reasons.

The first is the negative environmental impact, both to wildlife and people. Many species of plant life and wildlife will be displaced and/or destroyed due to the building of the plant. It may take decades or longer to fully recover from the damage. Entire Waste products including heavy metals and forever chemicals could end up in the ground and in our water supply. This risk alone is far too great to offset any economic or technological benefits.

The second is the noise pollution and extra traffic the plant will bring. This will disrupt residents including myself who have worked very hard to be a part of a community that prides itself on safety and tranquility, which will be disrupted.

The third reason is the cost of moving if the plant comes. My girlfriend whom I reside with has acute myeloid leukemia, and she cannot be around the aforementioned heavy metals and chemicals. If the plant comes, we will be forced to move, which is expensive and disruptive to the life we've build and become accustomed to.

Please consider this message when making your final decisions and say no to Micron. Thank you.

-Chris Minardi

Sent from my iPhone

From: Madeline Nyblade <mnyblade21@gmail.com>
Sent: Sunday, August 10, 2025 3:25 PM
To: chipsnepa@chips.gov
Subject: [EXTERNAL] Micron DEIS Public Comment

August 10th, 2025

Dear US Department of Commerce and Onondaga County Industrial Development Agency,

Thank you for the opportunity to comment on the July 10, 2025 Draft Environmental Impact Assessment (DEIS) for federal financial assistance to Micron Technology under the CHIPS incentives program and state financial assistance under the Green CHIPS Act for Micron's proposed Semiconductor Manufacturing Project in Clay, New York (EISX-006-55-CPO-001).

I am an Environmental Studies Professor at SUNY College of Environmental Science and Forestry. I completed my doctorate in Earth and Environmental Science at the University of Minnesota with a focus on hydrology. I also have a Bachelor of Science in Geoscience from Penn State. I do not speak on behalf of my employer, SUNY ESF, or any other organization. My comments are my own from my own expertise.

Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025.

The DEIS raises several concerns. I am writing to urge the Department of Commerce (DOC) and Onondaga County Industrial Development Agency (OCIDA) to minimize health, safety, and environmental harms; protect workers; and maximize equitable quality-of-life and socioeconomic benefits for communities impacted by Micron's development in Central New York (CNY).

Loss of Water Storage & Increased Runoff:

Micron's plans will turn 200 acres of wetlands and ~8,000 linear feet of streams into 645 acres of impervious surfaces (asphalt, concrete) and 58 acres of semi-impervious surfaces. Rainwater that was once contained on this site and recharged into aquifers will now be quickly discharged downstream as stormwater. This will be especially true during heavy rainstorms, which are predicted to increase with climate change.

Micron proposes to restore existing farm fields into wetlands. However, the proposed wetland restoration sites indicated in the DEIS are not downstream of Micron and therefore do not mitigate this loss of water storage.

While Micron's Draft Environmental Impact Statement recognizes this increase of stormwater runoff, they do not provide detailed stormwater management plans in their statement. Once complete, Micron project site will contain 66.6 acres of

stormwater management areas. Micron will implement stormwater best management practices and adaptive management informed by monitoring, all following NYS law and permitting requirements. Preliminary calculations of stormwater have been conducted for the project, but results were not included in the Draft Environment Impact Statement.

Following the Rational method, the standard yet simplified equation for estimating stormwater runoff (Thompson 2006), the Micron site will have about 1,360 cubic feet per second of runoff with rain at 2 inches per hour. For comparison, the Onieda River ranges from 2000 to 8000 cubic feet per second year just downstream of the Micron site in Euclid, New York ([USGS Stream Gauge Data](#)). Additionally, increased heavy rainstorms with climate change will further increase this stormwater runoff quantity, and has not been considered or addressed in this plan.

Stormwater quantities associated with the Rail Spur, Childcare Center, and the Wastewater Treatment Plant expansion have not been quantified. Water quality impacts of this stormwater are not addressed.

Comment: Sufficient information has not been provided to take a hard look at stormwater runoff and make a reasoned judgement justifying that the proposed 66.6 acres stormwater management and wetland restoration plans fully mitigate the water quantity and quality of increased runoff and loss of wetlands on the site.

Recommendation: Micron must provide detailed stormwater modeling and management plans as part of their Environmental Impact Statement. Independent experts should review this modeling and downstream communities should be included in the decision making process around acceptable levels of flood risk.

Sources: Thompson, D.B., 2006. The rational method, Regional regression equations, and site-specific flood-frequency relations. Austin, TX: Texas Department of Transportation Research and Technology, Report No. 0-4405-I. 78763-5080.

Increased Downstream Flood Risk:

Micron's flood analysis included looking at FEMA flood maps to see if any of their sites were in a 100- or 500-year floodplain. While they acknowledge that the extensive changes to their site will increase stormwater runoff rates and therefore lead to expanded floodplain boundaries, *their analysis does not include any such modeling or calculations*. They also acknowledge that significant growth of residential and commercial areas in the surrounding region is likely, and will lead to the loss of more wetlands and streams and an increase in impervious surfaces. This will raise risks for pollution and downstream flooding, yet they do not include this in their modeling or calculations. Additionally, they do not consider increased risks for heavy precipitation events with climate change in their flood risk analysis. Instead of fully exploring the impacts of climate change and development to flooding on their site, they conclude that their site is not within a floodplain or directly adjacent to one, and therefore there is no risk.

The Draft Environmental Impact Analysis does not include analysis of downstream flooding impacts of the proposed Micron site. They do not consider how their extensive development with increased impervious surfaces will impact flooding downstream, especially compounded with the increased residential and commercial development anticipated across the region. Additionally, the Micron facility will discharge ~40 million gallons per day of treated industrial and sewage wastewater once the facilities are fully built out. For comparison, the current wastewater treatment plant discharges about 6 million gallons per day. This water is discharged into the Onieda River which flows into the Oswego River to Lake Ontario. This discharge will increase the water flowing in Onieda and Oswego Rivers, along with the increased stormwater runoff, and could increase downstream flood risk.

While upstream [Brewerton](#) is projected to have only moderate flood risk, downstream towns of [Phoenix](#) and [Fulton](#) have severe and extreme flood risks respectively, according to First Street Map analysis. These risks will only increase with climate change and increased impervious surfaces in the watershed.

Comment: The Draft Environmental Impact Statement says the Micron development will not result in significant adverse or cumulative effects on water resources and floodplains. However, sufficient information has not been provided to take a hard look at cumulative flooding impacts and make a reasoned judgement justifying that the proposed stormwater management and wetland restoration is enough mitigation to address all of these impacts and claim not significant adverse effects.

Recommendation: Micron must provide detailed stormwater modeling and management plans that account for climate changes, increasing regional development, changes in floodplains, wastewater discharge, that mitigates downstream flooding risk.

Dewatering for construction:

The Micron Draft Environmental Impact Statement notes that groundwater was 0.1 to 4.2 feet below the surface. To construct the fabrication facilities and other infrastructure on site that extend deep underground, Micron will have to pump out water, as they mention in their Draft Environmental Impact Statement. This “dewatering” will artificially lower the water table, potentially draining nearby wetlands, streams, and wells. This water will also have to be stored and discharged somewhere. Construction is estimated to take 16 years.

Comment: The Micron Draft Environmental Impact Statement does not take a hard look at the environmental impacts of dewatering in their construction process to justify use of this process without a mitigation plan to protect the surrounding wetlands, streams, and wells.

Recommendation: Micron should disclose when, where, and how long they will dewater this site and how they will mitigate the impacts to surrounding wetlands.

Interim Wastewater Discharge during build-out:

Before the full wastewater treatment plan upgrade, Micron will begin discharging water from their construction, initial equipment testing, and possibly initial manufacturing in Fab 1. Micron will construct a temporary water treatment project to treat this water, consisting of temporary biological treatment. Fab 1 is scheduled to be complete by 2029 by which point they will be producing 8.7 MGD of industrial wastewater. Therefore, it seems this temporary water treatment plan will span at least four years and include significant amounts of wastewater.

Comment: Very few if any details of their temporary plan are included in the Draft Environmental Impact Statement. Therefore, the Micron Draft Environmental Impact Statement does not take a hard enough look at the first four years of wastewater discharge (up to 8.7 MGD) and provide an adequate plan for treating this pollution to justify the claim there will be no significant adverse effects.

Recommendation: Micron must provide such plan and justification.

Water contamination from construction:

During the 16-year construction period, large expanses of the Micron site will be cleared and excavated, exposing sediment that was previously held in place by vegetation to erosion. The Micron Environmental Impact Statement says “temporary erosion and sediment controls, stormwater management areas, and stormwater infrastructure” will be put in place. New utility lines will be buried in 420 acres of land by excavating trenches, laying pipe, and recovering trenches, or by jack and bore drilling. Hydraulic directional drilling will also be used to lay pipe underneath streams.

Comments: These methods have the potential to release drilling fluids and sediment into downstream waters. While Micron commits to using sediment controls, no specifics are detailed. This is especially concerning because the construction is proposed to last for 16 years, which is a long time to maintain temporary sediment erosion controls.

Recommendation: Micron must fully account for these impacts and mitigations plans in detail.

Industrial Pollution

The DEIS does not discuss in any detail the pollutants that are likely to be part of its industrial wastewater stream. The DEIS acknowledges process-related wastewater will likely contain PFAS substances, but there is no information on the type or amount of PFAS that will likely be present. Instead, the DEIS relies on bald assertions that the Micron facility and the planned Oak Orchard Industrial Wastewater Treatment Plant (WWTP) will use advanced treatment technologies and will comply with their respective Clean Water Act permits. Based on a promise of permit compliance, Micron asserts that its wastewater discharges will have no significant environmental impact. This is an incomplete assessment for several reasons.

First, PFAS is a common component of all semiconductor manufacturing and is likely used in and discharged from Micron's other facilities. Micron relies on its experience in Idaho and Taiwan to estimate overall waste levels (Table 3.8-4, p. 3-232). It should be able to use that same experience to provide additional information on the type and amount of PFAS substances used in production, the discharge methods that have been implemented in other facilities, and their effectiveness.

Second, PFAS is an emerging contaminant and, despite the known hazards of exposure, environmental regulations haven't caught up. Micron acknowledges that there are at least 10,000 PFAS substances known to be used in or produced by manufacturing processes (p. 3-240). Fewer than 10 PFAS substances have established federal or state drinking water standards that could be translated into permit terms. This is complicated even more by the lack of reliable detection methods. As stated in the DEIS, EPA's most up-to-date methods can detect only 40 PFAS substances. For these reasons, compliance with permit terms does not mean no significant environmental effects.

Recommendation: Micron should provide more information about the type and amount of PFAS that are used in the production processes in its other facilities and the amount and type found in those waste streams. Unless Micron can demonstrate otherwise, the DEIS should assume that all -- or a percentage based on past experience -- of this PFAS will escape detection or capture by any industrial wastewater treatment plant and assess the impacts of its discharge into the environment.

Contamination in Wastewater Sludge

The DEIS does not consider the potential contaminants in sludge generated by its on-site industrial wastewater treatment facility. As noted in the first comment and acknowledged by Micron, there are likely to be PFAS substances in the process-related wastewater. If Micron is able to remove PFAS from this wastewater stream before discharging to Oak Orchard WWTP, that PFAS will likely be contained in the sludge, which will limit its beneficial reuse.

Recommendation: Micron should provide additional detail on the PFAS treatment systems proposed for its on-site Industrial WWTP, including an assessment of where PFAS removed from the process wastewater will end up. Unless Micron can show that PFAS will fall out elsewhere in the treatment process, the sludge from the on-site industrial WWTP should be considered hazardous and not suitable for land application as fertilizer or soil enhancer.

Air Pollution:

The DEIS asserts that air pollution emissions from the construction nor operation of the Micron facility will not violate the National Ambient Air Quality Standards (NAAQS) for the study area. However, most of the monitoring data for criteria air pollutants (those with established NAAQS) on which this assessment relies comes from monitors in Rochester, NY, more than 70 miles from the project site. Only ozone and small diameter particulate matter (PM_{2.5}) are measured in the Syracuse area. Conditions in Rochester may be expected to be similar, but Micron should at least be required to demonstrate -- with actual local monitoring data -- that they are before relying on these figures to demonstrate that the facility will not have any significant environmental impacts.

In addition, in making this assessment, the DEIS does not allow for or consider the impacts of any exceedances, upsets, or violations in assessing the environmental impacts of air emissions. However, no equipment works perfectly. Again, based on its experience in chip manufacturing, Micron should have some sense of how often its facilities encounter upsets, exceedances, or unavoidable permit violations that may result in excess air emissions. If Micron doesn't have that data, it could rely on industry-wide statistics. For example, the Environmental Working Group found that, as of October 25, 2024, 10% of active semiconductor manufacturing facilities had violated federal environmental laws and regulations in the last 10 years and 27% of the facilities with individual discharge permits had violated those permits. (Environmental Working Group (2024, Oct. 25), "What the Building CHIPS America Act Could Mean for Public Health and the Environment," available on-line at <https://www.ewg.org/news-insights/news/2024/10/what-building-chips-america-act-could-mean-public-health-and-environment>).

Finally, assuming that the DEIS NAAQS compliance analysis is correct, modeled levels of both NO_x and PM_{2.5} are very close to NAAQS limits. Given the uncertainty inherent in modeling data, Micron should be required to keep a closer eye on the regional levels of these pollutants during construction and operation.

Recommendation: Micron should be required to either provide background data supporting its assumption regarding the comparability of Rochester and Syracuse air quality conditions for most of the critical air pollution evaluated OR install air quality monitors in the airshed directly affected by the Micron facility. The data from those monitors could be used to both check NAAQS compliance under regular operating conditions and to identify the environmental impacts of exceedances, upsets, or other unavoidable violations of air emission limits. Micron can then adjust its operations or its controls if the localized air monitoring shows a problem.

Data Requirements

Throughout the air, water, and solid/hazardous waste sections of the DEIS, Micron asserts that it will comply with all applicable federal and state laws, regulations, and permits and therefore its operations will have no significant environmental impacts. That is not appropriate. Both NEPA and SEQRA assume compliance with applicable laws. The goal of these environmental assessment statutes is to determine what the environmental impacts of otherwise legal actions will be. In some cases, such as the NAAQS which are based on achieving or maintaining ambient air standards designed to protect public health, this may be appropriate. (Even in NAAQS-compliant airsheds, however, there may be localized exceedances that create public health impacts. *See* Carlson, A.E. (2018). The Clean Air Act's Blind Spot: Microclimates and Hotspot Pollution, 65 U.C.L.A. Law Rev. 1036.) For other environmental standards based on best available technology or, in particular, in areas where regulations are struggling to catch up with data on environmental impacts, this assumption is not valid.

Recommendation: Rather than simply reciting the applicable legal standards and its intent to comply with those standards, Micron should be required to provide data on the pollution reduction that can be achieved via available air emission or water discharge controls and assess the environmental impacts of the resulting emissions/discharges directly.

Community Oversight

The Micron project will take more than 15 years to build, involves complex and evolving technology, and admittedly includes many uncertain environmental impacts. As noted above, the type and amount of PFAS discharges in wastewater, the level of control achievable from available PFAS control technology, the actual regional levels of most criteria air pollutants, the likely air emissions from the facility, particularly in terms of upsets and exceedances are unclear. The DEIS acknowledges other major uncertainties, such as the location and intensity of residential or commercial development sparked by the project; and the success of wetlands, bat, and grassland bird mitigation projects. Because of the inherent uncertainty surrounding other impacts, Micron has committed to adaptive management for issues such as managing groundwater and stormwater run-off on-site wetlands, and flood response.

The DEIS mentions air and water quality monitoring, but it lacks detail on how data will be shared with the public and how health outcomes will be tracked over time. Establishing a community advisory and oversight board to oversee environmental monitoring and ensure transparency should be considered. The DEIS references the idea of adaptive management as best management practice in many areas, including managing groundwater during construction, managing stormwater run-off, managing on-site wetlands, and flood response. The DEIS also discusses complying with evolving best management practices or installing new control technology to limit emissions or other environmental impacts. This means that, as new best practices come online over the course of construction or operations, the project might be amended to incorporate less environmentally harmful projects.

Recommendation: Given the inherent uncertainties and evolving nature of this enormous and long-term project, Micron should be required to create and support a community advisory and oversight committee which can help with on-going monitoring, environmental impacts assessment and response, and community engagement. This committee should be composed of both community members and local experts who can provide grounded information to and review of continuing assessment and adaptive management at the site and a direct line of communication with the affected public.

The baseline and long-term monitoring must include:

1. Air and Water: Long-term and local air quality monitoring as well as monitoring of surface waters and both shallow and bedrock groundwater quality and quantity.
2. Restored Wetlands: The wetland mitigation plan acknowledges that changes in restoration methods may be required based on restoration successes or failures in the field. Further the restored wetland sites are meant to operate in perpetuity. On-going monitoring and opportunities for citizen or community expert engagement is critical to ensure that this mitigation measure operates as designed.
3. Impact of Habitat Loss: The DEIS presumes that, between mitigation plans and available habitat near Micron campus, the loss of habitat for bats, birds, small mammals, amphibians/reptiles, and native plants will not be a significant problem. Additional baseline and post-construction impact monitoring of wetland, forest, grassland loss is necessary to demonstrate that this assumption is correct.

The Community Oversight committee would review:

1. Micron's mitigation measures sequentially for each FAB to ensure that the best available practices are adopted.
2. Micron's ongoing mitigation efforts to prevent climate change will also evolve in response to technical developments.
3. The several areas in the DEIS where impacts are uncertain, unpredictable, or based primarily on modeled data:
 1. Use of best available technology to detect and remove PFAS from wastewater and air emissions;
 2. The location and intensity of residential or commercial development sparked by the project, including the traffic impacts;
 3. Noise effects from construction and operation, including related traffic, which are based on modeled data;
 4. The success of wetlands mitigation projects; and
 5. The likely air emissions from the facility

Public engagement and communication would be promoted through an on-going community advisory and oversight committee. This Committee should have a meaningful oversight role and should be considered an enforceable condition of Micron's CHIP grant.

More Consideration of Alternatives

The DEIS considered and rejected project alternatives that involved a smaller production facility (two or three "fabs" rather than four). This assessment was based on a stated need for Micron to produce 52,000 wafers per week to meet the national need for domestic chip production. Since this assessment was completed, Micron announced plans to build a second fab at its Idaho facility and a new plant on its Virginia site. (Day, Don (Jun 12, 2025). *Micron Announces Second Fab*, BoiseDev, <https://boisedev.com/news/2025/06/12/micron-boise-second/>). Given this significant production expansion, the 52,000 wafer per week production goal may be met in other ways, allowing for Micron to consider a scaled-down version of its Clay facility. Even a slightly smaller three- fab alternative in Clay might eliminate significant environmental impacts by avoiding wetlands clustered east of Burnett Road.

Recommendation: For that reason, the DEIS should be expanded to consider a three-fab alternative.

Sincerely,

Madeline Nyblade

Assistant Professor, SUNY ESF

Archived: Thursday, August 14, 2025 12:32:54 PM

From: [Linda B. Radin](#)

Mail received time: Sun, 10 Aug 2025 19:26:48

Sent: Sun, 10 Aug 2025 15:26:41

To: [chipsnepa](#)

Cc: [Linda B. Radin](#)

Subject: [EXTERNAL] Micron project feedback

Importance: Normal

Sensitivity: None

Hello-

I am writing as part of the public commentary on the Micron project. The Micron report says that the land was purchased by the Onondaga Industrial Development Agency to put some kind of industrial park on the property to begin with, so there's probably not much anyone can say about adverse effects on nature for this project or any other. Given that, I can appreciate that Micron is attempting to mitigate loss of habitat by creating alternative habitat elsewhere. However, the alternative habitat is not going to help the hundreds of thousands of plants and animals currently living in the target zone, who face death by loss of their homes, food supply, water supply, and outright suffocation by being buried alive in their burrows as acres of concrete get poured on top of them. There may also be migratory ill-effects that we are unaware of. There should be a substantive relocation effort for the myriad species already living in the target zone, who can't read a map to tell them where their new homes are.

Additionally, the use of untold quantities of water from Lake Ontario is troubling, as much of the country faces drought. The factory would pretty much be poisoning great quantities of the freshwater supply every day, which would then have to be piped and stored elsewhere. Every environmental worker knows that the pipes and storage vats eventually leak into the soil and groundwater, contaminating the food and water we need to survive. Micron's storage system is not likely that much better than anyone else's. They also use the phrase "renewable freshwater" to refer to Lake Ontario. As any fifth-grader can tell you, the water system is a closed circuit: rain falls, water moves and evaporates into the air, which moves and falls again as rain. Water is not "renewable". Once it's poisoned, it's gone. This jeopardizes freshwater availability for our survival in the not-so-far future, as well as for other communities near the lake and various other affected streams and creeks, which depend on that water for their own livelihoods, such as fishing and tourism (and eating and drinking).

The use of "billions of cubic feet of natural gas per year" also makes the project dependent on a dirty fuel supply, contributing greatly to climate change and further poisoning the air we breathe, as well as the water we drink and the soil we grow our food in. Investing in clean credits is nice, but it doesn't do much to mitigate this impact locally, as the gas still needs to be extracted from the ground, which causes its own pollution, and then burned for energy. They are also clear-cutting away hundreds of acres of trees, which will no longer be available to help clean the air, will release more carbon, and be a major habitat loss for birds and other species. With all of that construction, Micron could at least set up solar panels on the rooftops of the new buildings. (I know, this is Syracuse, mostly overcast but we still *sometimes* have pretty sunny days.). They could also invest in and use energy from some of the nearby wind farms, which are already up and functional.

Thank you for the opportunity to comment.

-Linda B. Radin

Onondaga County resident

From: Barb <broot1@twcny.rr.com>
Sent: Sunday, August 10, 2025 1:24 PM
To: CHIPSNEPA@chips.gov
Subject: [EXTERNAL] Comments to Micron DEIS

As different groups are submitting comments on a list of specific DEIS items, I'll comment here just on land preservation.

The Micron project will bring huge changes to our region. The region has lost most of its manufacturing base over the past many years, and it seems the Micron project will be a big boost. Syracuse's history with our large manufacturers, however, has been fraught with environmental consequences. For example, Allied Chemical brought jobs but poisoned Onondaga Lake. Remediation moved dredged waste material to other sites to the dismay of neighbors; lake shores are still contaminated yet we build and plant on them to camouflage the white contaminants that remain. This is all to say that Micron must do better — must be required to be a regional environmental partner as it brings job opportunities to us and income to itself and shareholders.

The project is going to destroy critical wooded wetland habitat. Micron should purchase, and preserve from development, contiguous parcels of equal or better habitat quality. It should support our local land preservation not-for-profit organization, CNY Land Trust, through partnering, donation, and by establishing, in perpetuity, a stewardship endowment.

On site, instead of the usual non-native landscaping with lawns, establish native conservation plantings following the ideas of Homegrown National Park.

<https://homegrownnationalpark.org/>

Sincerely,
Barb Root

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**Archived:** Thursday, August 14, 2025 12:36:56 PM

**From:** [Robert Sarason](#)

**Mail received time:** Sun, 10 Aug 2025 21:52:31

**Sent:** Sunday, August 10, 2025 5:52:32 PM

**To:** [chipsnepa](#)

**Subject:** [EXTERNAL] Micron Comments

**Importance:** Normal

**Sensitivity:** None

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Dear Micron and OCIDA,

I request that there should be additional public hearings and that the comment period be extended six months since there is not enough time to listen to the community stakeholders. I am interested in the transportation and housing. I believe the influx of new people into our community will increase the cost of housing, especially since there will not be enough of new residential construction, Consequently, the poor will be driven from their homes and the the economic disparities in our community will get worse.

I also believe the transportation issues were not adequately addressed since there is no point of having new jobs with higher pay than normal manufacturing jobs in the Syracuse area if the people of the city of Syracuse, particularly people of color do not have meaningful access to Micron by adequate , subsidized transportation. One way to resolve the transportation problem is having Micron pay full fare for a transportation system that would guarantee that all residents of the city of Syracuse receive free transportation to and from Micron in less than 45 minutes one way. This could be handled by the metropolitan transit system and/or Micron vans. Either way, the cost of this service should be subsidized by Micron.

Since Micron is receiving so much financial assistance and since the poverty in Syracuse is so glaring, Micron must provide some assistance in providing economic assistance to people who desperately need economic assistance to get to well-paying jobs in the suburbs. Building a new facility without an upgraded transportation system would be one more fatal step in disregarding the needs of the residents of the City of Syracuse.

Sincerely,

Robert Sarason

6110 Bay Hill Circle

Jamesville, NY 13078

315-744-0145

[robert.sarason@gmail.com](mailto:robert.sarason@gmail.com)

**Archived:** Thursday, August 14, 2025 12:35:46 PM

**From:** [Caroline Schipper](#)

**Mail received time:** Sun, 10 Aug 2025 21:09:10

**Sent:** Sunday, August 10, 2025 5:09:11 PM

**To:** [chipsnepa](#)

**Subject:** [EXTERNAL] Re: Public Transportation

**Importance:** Normal

**Sensitivity:** None

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CHIPS Program Office CHIPS Program Office,

I am very concerned that there will not be equal access to jobs at MICRON if the transportation system in Syracuse is not greatly improved. Many people in our community live in poverty, do not have cars, and confront a transportation system that does not run in all neighborhoods. Buses do not run regularly through out the day. Micron must have plans to work with the New York Dept. of transportation to increase bus stops and routes through out the city. Many of Micron's future workers will live in our city and will desire a more comprehensive bus schedule as well.

This is also an environmental issue because more appropriate transportation will also deal with the traffic congestion and car exhaust pollution which will certainly develop when your factories open.

Caroline Schipper  
schipper44@gmail.com  
410 Scott Ave  
Syracuse, New York 13224

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**From:** applepies <wishtomakeanapplepie@gmail.com>  
**Sent:** Monday, August 11, 2025 11:57 PM  
**To:** CHIPSNEPA@chips.gov  
**Subject:** [EXTERNAL] Micron Environmental impact  
**Attachments:** battykoda.jpg

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There are so many concerns I could address. From the obvious PFAS to offsetting and displacing a flood basin that will alter the landscape and flood residences. I could also talk about the unprecedented size of the project and how fun it will be for days when hydrogen sulfide is giving a pleasant fragrance of rotten eggs to an otherwise fresh air region of once quiet and quaint suburbs. I could talk about how few people brought up the Manassas incident and what happens when chemicals go wrong... The traffic, the unneeded infrastructure / population increase, the disruption for classes of people who are already having a hard time in a sellers market. I could talk about how disgusting it is to waste the habitat of endangered species regardless of construction windows or attempting a 2:1 "reconstruction". Don't listen to ecologists or biologists. What could they know? It cannot "truly" be recreated regardless of the long term scope. Some things also just have to be stood on principle in the face of the seemingly always industrial disregard for the natural environment. We could also discuss at length people's ignorance of industrial heat island effect, the emissions (as we know this is not going to be net zero for a long time) etc. Everyone is complaining about record heat averages yet they just continue to assist in the rise. I could even talk about how this project's location is going to absolutely eat into the Adirondack territory with population and possible pollution. Another place slowly becoming less and less sacred.

This all seems immaterial to address for a people who will quite literally destroy themselves and everyone else by continually disrupting the natural environments and over-populating, over paving and needing plazas at every turn. Refusal to release reports, threats of eminent domain. Business as usual. Not a good look. Yet somehow is trying to sell a community on "growth". The community has no say. They will be placated with every lie in the book under the pressure of greed.

What else doesn't look very good? Onondaga lake, once sacred to the Haudenosaunee (aka Iroquois people) became the most polluted lake in the world. You want to say "that was then this is now"? Understandably so but also a fool's point. It's something a greedy person without foresight would say. We are just now catching up to understanding the dangers of microplastics being discovered in our bodies and all life on Earth. We don't even understand some of the long term effects of the materials / process we're using with "PFAS" chemicals. You think it's going to be good? Do you think that's a good look for the "largest chip-making facility" to be built in the region of one of the world's most polluted

lakes? Not just America. What Allied Chemical did? That was sacrilege. The building of this plant is also sacrilegious. The history and destruction of that lake's ecosystem should have served as the entire community's (and international) cautionary tale for things that happen when disrupting the natural world and taking a dump on it. As a point of principle (not just preserving the natural biomes as much as possible), things like this should never come on the desk of the wrong local politicians in this beautiful region. Syracuse was once upon a time a place of industry but guess what... The times are changing. Neither the economy nor the community needs or wants something of that magnitude. The only people who obviously want it are those who stand to turn a profit from it. Obviously. Generations of good people and families don't need the concern of a "new pollution". They don't need the concern of being out-classed and not being able to afford the region they grew up in.

I do utilize technology. I'm realistic in understanding it's a monster we've created in civilization. I also understand that no one wants certain things in "their back yard". At the same time, are there not better regions near large bodies of water? Michigan and Ohio have miles of abandoned car manufacturing plants already paved. No natural habitat destruction. It's blight. Wetlands are not "blight". It's an ecosystem. It's alive. It just feels like a small people is being taken advantage of (being dumped on) and we're being overpowered by aliens who want our water... Not dissimilar to Independence Day. Do we have a choice? Will our voices actually matter? Or will we simply be placated and bossed around. I can't emphasize enough (because I didn't hear many others bring this up) again that this location would be in the underbelly of the Adirondack territory and will also have a negative impact on that region with population growth. So please don't.

Thank you for your time if you didn't use Ai to shorten my email. Comprehend the reasons for rejecting the potential reality and consequences of this project. This is NOT what we the people of Onondaga county wish to represent or be known for. We are NO LONGER a people of industry. If it were up to us there would be a wooded trail through the wetlands so people might become more educated before they scarf up the planet. That's who we are. We respect the land. Outsiders and greed have already made the mark to make things like this unwelcome.

Also I ask this to whom it may concern... You may find this corny but I'm serious.

Go watch Fern Gully: The Last Rainforest with your kids (heres a link it's free). Then look them in the eyes and tell them what you do... Let them know you might be helping not one species of "Batty Kodas" but 2 make the soon to be extinct short list. Tell them why you have to evict them. Construction around roosting seasons will mean nothing. It will do anything but help protect wildlife.

Again, thank you for your time to understand what is sacred here that should be sacred everywhere.

[FernGully: The Last Rainforest](#)

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**From:** peter@pjaarch.com  
**Sent:** Monday, August 11, 2025 6:37 PM  
**To:** CHIPSNEPA@chips.gov  
**Subject:** [EXTERNAL] DEIS Comments for Micron Project, Clay, NY - Section 5.1  
**Attachments:** Micron DEIS comments PJA 2.pdf

As a long-time practicing architect and sustainable community planner in Central New York, I am submitting comments on the Draft Environmental Impact Statement (DEIS) for the proposed Micron plant in Clay, NY.

These comments are contained in the body of this email and attached as a pdf file. Should there be any reason why these comments cannot be included in the public record for this action please advise ASAP so that a remedy can be sent; otherwise I will assume that these comments are acceptable for inclusion in the public record and for appropriate response and consideration when the Final EIS is issued.

Thank you for the opportunity to submit these comments. If you have any questions, please contact me anytime.

**To: OCIDA / CHIPSNEPA**

**RE: Micron Project – Clay, NY DEIS comments**

**From: Peter J. Arsenault, FAIA, Architect**

**Date: August 11, 2025**

**Comments herein refer to  
DEIS Section 5.1 – Unavoidable Significant Adverse Impacts**

Page 682 of the Micron DEIS points out the SEQRA requirement to identify any “adverse environmental impacts that cannot be avoided or adequately mitigated if the proposed action is implemented” (6 NYCRR § 617.9 (b)(5)(iii)(b)). The document goes on to say that “A significant adverse impact is considered “unavoidable” if there are no reasonably practicable mitigation measures to eliminate the impact, or if there are no reasonable alternatives to the proposed project that would meet the purpose and need of the action, eliminate the impact, and not cause other or similar significant adverse impacts.”

The DEIS then lists 5 areas where the Preferred Action Alternative “would result in some unavoidable significant effects that cannot reasonably be avoided or mitigated below the level of significance.” These areas include Water Resources, Biological Resources, Climate Change, Transportation, and Noise.

As a practicing, licensed architect in New York State and elsewhere in the United States, I have been directly engaged in creating “sustainable” and “green” buildings and communities since 1980 – long before those terms were popular. I take exception to the acceptance of some of the “unavoidable” significant impacts identified in the DEIS. Over the past 45 years, I have witnessed changes in design approaches, technology, and construction systems that reveal many things previously thought to be unavoidable were being overcome and even fully abated. Therefore, I submit that there are many reasonable, practical, methods or alternatives to achieve mitigation or avoidance which are omitted from the DEIS and need to be addressed.

The successes of the past 40+ years have been based on several key factors. First, a recognition that “business as usual” does not need to be the norm when designing and engineering an industrial building or providing it with energy and other resources. Second, an exploration of available alternative options for building construction, energy generation, land-use planning, and building operations. Finally, a commitment by all of the stakeholders to go beyond the “status quo” and achieve something that is truly better for the people who work in and use the facility as well as for the surrounding community. Yes, this means a bit more work on the part of the professionals involved in the project, but it also means that a facility like the Micron plant can truly achieve a higher standard of sustainability and green building operations, thus avoiding significant impacts.

Based on the foregoing, I submit that the following points be reconsidered or be made a condition of any permit that is issued as a result of the EIS.

**Water Resources** The impact on the nearly 200 acres of wetlands on the site seems to be the result of the location of the buildings, roadways, and parking. The four planned buildings of 1.2 million square feet each (4.8 million square feet total) are being located and placed on a site that is 1,377 acres or 59.9 million square feet. That means the buildings only require approximately 8 percent of the entire site. The wetlands are about 8.7 million square feet or about 16 percent of the entire site. Consider the following points:

- **Building Locations:** If the buildings were located outside of the wetlands, that means approximately 75 percent of the site is still available for development. The placement of the buildings has been shown in renderings as four identical facilities lined up in a row. Have other layouts been assessed which would still allow efficient operation and flow while avoiding the wetlands? Such an approach would mean that wetland impacts would indeed be avoidable.
- **Access and Site Roadways:** The second apparent reason for the wetlands and water resource impact is the need for access and onsite roads. The DEIS refers to, but fails to provide any details on, other planning alternatives that were considered for the layout and design of the roadways and access points for the project. Alternative road layouts that avoid crossing the 16 percent of the site that has wetlands, means direct water resource impact could be avoidable. Runoff water can also be managed, filtered and controlled using readily available porous paving methods, well-designed bio-filters, and controlled water retention. In fact, the wetland areas can play a role in that if designed properly. It would be more appropriate to transfer some of the construction budget into these types of measures instead of constructing multiple smaller off-site wetlands that are likely to fail in their attempt to serve the natural environment. Hence, more impacts would be avoidable.

- **Parking:** The DEIS fails to adequately address transportation options beyond the use of automobiles. As others have commented, if public transportation were provided and planned for, the need for automobile parking would be reduced as would the need for paved parking areas. Porous pavement and controlled water runoff management could similarly mitigate water resource issues as well as “heat island” effects, making all of these avoidable.

**Biological Resources** As with the water resources impacts stated above, alternatives in planning and layout that consider avoiding critical habitat locations, or preserving them to the extent possible, could significantly reduce the impact making at least some of them avoidable.

**Climate Change** There are two areas noted in the DEIS which impact climate change:

- **Construction Activity:** For the past decade or longer, the North American design and construction community has been actively engaged in and exposed to alternative materials, products, and construction methods which directly reduce the GHG impacts of construction. This is particularly true for omnipresent materials such as concrete, aluminum, and steel which can account for the vast majority of GHG emissions. As a result, it is quite possible, today, to use low-carbon concrete which can reduce the carbon emissions of the process literally by nearly 50 percent. With an accelerated rate of development and adoption in New York State, it is entirely conceivable that very low carbon, or even no-carbon concrete may be available soon, during the construction of the first fab plant. By making low carbon concrete a required stipulation of permitting, a very significant amount of GHG emissions can be avoided. Further, the sheer quantity needed (680,000 cubic yards estimated for each fab plant) would directly impact the market offering a positive “ripple effect” for wider use of low carbon concrete in NY State, instead of producing a negative impact. The same can be said about steel, particularly structural steel and reinforcing steel. The not-for-profit organization Architecture 2030 has information on this topic - <https://www.materialspalette.org/steel/> I would propose that the use of recycled steel processed in an electric arc furnace (preferably from sustainable electricity) be a stipulated requirement of any permits. Notably, the CNY local company, Auburn Steel, has been well known for providing such steel products in the past, others are available as well.
- **Building Operations:** There is a plethora of information and knowledge about ways to design buildings, so they use less energy. Therefore, at a minimum, the buildings should be required to meet a significant level of energy use reduction as evidenced in third party certifications such as LEED® or others. Process energy is not typically included in such certifications, so if Micron is to live up to its promise of being “truly sustainable” then the sources of their immense energy requirements need to be sustainable. That either means renewable, non-polluting on-site energy generation (i.e., wind, solar, hydro, etc.) or purchasing renewable energy. The statement that Micron intends to use significant amounts of renewable electricity is a start, but based on the numbers in the DEIS, that only accounts for half of the total energy requirements. The other half is currently shown as being provided by natural gas or diesel -polluting fossil fuels. Converting those needs to

renewable electricity or to a non-polluting alternative (i.e., hydrogen, biomass, etc.) would mean that more of the Climate Change impacts would be avoidable and would reduce their significance.

**Transportation** The unavoidable impacts cited in the DEIS related to transportation are all related to automobile and truck traffic on roadways. As noted above, the use of public transportation, mass transit, or other automobile alternatives would greatly reduce the significance of this impact and make them quite avoidable. There are countless examples of successful rubber-tire based transport (i.e., buses with “stations”), light rail, or even cable-based systems that dramatically relieve the burden on traffic. In the process, they can directly reduce air pollution from gasoline or diesel-powered vehicles, particularly if electric vehicles are used. Implementing alternatives such as these, including the option of dedicated travel lanes or travel ways, not only reduces the impacts from transportation, but they can also make the travel experience more palatable and appealing for workers, visitors, and vendors accessing the Micron plant. A greater focus on alternative modes of transportation could create more positive outcomes individually and cumulatively. Therefore, directing public or other funds towards these mass transit/ public transportation options instead of only on highway improvements can yield a notable reduction in the significance of the transportation impacts.

**Noise** The DEIS presumes that noise during construction can be effectively mitigated, which is reasonable although the details of what is being proposed there are not clear. The post-construction noise concern is again with traffic. This is another case where mass transit/ public transportation can yield positive instead of negative impacts. By reducing the number of cars and other vehicles, the noise levels are directly reduced.

**Conclusion** Based on all of the foregoing, **I submit that the list of unavoidable significant adverse effects in the DEIS is flawed.** It reflects a lack of commitment to truly sustainable planning, design, and construction and allows for the “easy way out”. **It is not appropriate for the lead agencies to accept these things as “unavoidable” when there is so much evidence to the contrary** as shown in successfully constructed and operating facilities today – and with the trend to be able to do even better during the decades of construction of the Micron project. **I urge you to acknowledge this reality and make it a requirement of the project to meet all of the currently achievable levels of sustainability as described.**

***Peter J. Arsenault***

**Peter J. Arsenault, FAIA, NCARB, LEED-AP**

Principal

Peter J. Arsenault, Architect

Cell Phone: (315) 439-2458

Email: [Peter@PJAArch.com](mailto:Peter@PJAArch.com)

Website: [www.PJAArch.com](http://www.PJAArch.com)

Missouri Office

919 Camargo Drive

Ballwin, MO 63011

New York Office

4607 Dartmouth Circle

Manlius, NY 13104

**To: OCIDA / CHIPSNEPA**

**RE: Micron Project – Clay, NY DEIS comments**

**From: Peter J. Arsenault, FAIA, Architect**

**Date:** August 11, 2025

Comments herein refer to

**DEIS Section 5.1 – Unavoidable Significant Adverse Impacts**

Page 682 of the Micron DEIS points out the SEQRA requirement to identify any “adverse environmental impacts that cannot be avoided or adequately mitigated if the proposed action is implemented” (6 NYCRR § 617.9 (b)(5)(iii)(b)). The document goes on to say that “A significant adverse impact is considered “unavoidable” if there are no reasonably practicable mitigation measures to eliminate the impact, or if there are no reasonable alternatives to the proposed project that would meet the purpose and need of the action, eliminate the impact, and not cause other or similar significant adverse impacts.”

The DEIS then lists 5 areas where the Preferred Action Alternative “would result in some unavoidable significant effects that cannot reasonably be avoided or mitigated below the level of significance.” These areas include Water Resources, Biological Resources, Climate Change, Transportation, and Noise.

As a practicing, licensed architect in New York State and elsewhere in the United States, I have been directly engaged in creating “sustainable” and “green” buildings and communities since 1980 – long before those terms were popular. I take exception to the acceptance of some of the “unavoidable” significant impacts identified in the DEIS. Over the past 45 years, I have witnessed changes in design approaches, technology, and construction systems that reveal many things previously thought to be unavoidable were being overcome and even fully abated. Therefore, **I submit that there are many reasonable, practical, methods or alternatives to achieve mitigation or avoidance which are omitted from the DEIS and need to be addressed.**

The successes of the past 40+ years have been based on several key factors. First, a recognition that “business as usual” does not need to be the norm when designing and engineering an industrial building or providing it with energy and other resources. Second, an exploration of available alternative options for building construction, energy generation, land-use planning, and building operations. Finally, a commitment by all of the

## **Micron Project – Clay, NY**

DEIS comments prepared and submitted by

**Peter J. Arsenault, FAIA, Architect**

August 11, 2025

stakeholders to go beyond the “status quo” and achieve something that is truly better for the people who work in and use the facility as well as for the surrounding community. Yes, this means a bit more work on the part of the professionals involved in the project, but it also means that a facility like the Micron plant can truly achieve a higher standard of sustainability and green building operations, thus avoiding significant impacts.

**Based on the foregoing, I submit that the following points be reconsidered or be made a condition of any permit that is issued as a result of the EIS.**

**Water Resources** The impact on the nearly 200 acres of wetlands on the site seems to be the result of the location of the buildings, roadways, and parking. The four planned buildings of 1.2 million square feet each (4.8 million square feet total) are being located and placed on a site that is 1,377 acres or 59.9 million square feet. That means the buildings only require approximately 8 percent of the entire site. The wetlands are about 8.7 million square feet or about 16 percent of the entire site. Consider the following points:

- **Building Locations:** If the buildings were located outside of the wetlands, that means approximately 75 percent of the site is still available for development. The placement of the buildings has been shown in renderings as four identical facilities lined up in a row. Have other layouts been assessed which would still allow efficient operation and flow while avoiding the wetlands? Such an approach would mean that wetland impacts would indeed be avoidable.
- **Access and Site Roadways:** The second apparent reason for the wetlands and water resource impact is the need for access and onsite roads. The DEIS refers to, but fails to provide any details on, other planning alternatives that were considered for the layout and design of the roadways and access points for the project. Alternative road layouts that avoid crossing the 16 percent of the site that has wetlands, means direct water resource impact could be avoidable. Runoff water can also be managed, filtered and controlled using readily available porous paving methods, well-designed bio-filters, and controlled water retention. In fact, the wetland areas can play a role in that if designed properly. It would be more appropriate to transfer some of the construction budget into these types of measures instead of constructing multiple smaller off-site wetlands that are likely to fail in their attempt to serve the natural environment. Hence, more impacts would be avoidable.
- **Parking:** The DEIS fails to adequately address transportation options beyond the use of automobiles. As others have commented, if public transportation were provided and planned for, the need for automobile parking would be reduced as

## **Micron Project – Clay, NY**

DEIS comments prepared and submitted by

**Peter J. Arsenault, FAIA, Architect**

August 11, 2025

would the need for paved parking areas. Porous pavement and controlled water runoff management could similarly mitigate water resource issues as well as “heat island” effects, making all of these avoidable.

**Biological Resources** As with the water resources impacts stated above, alternatives in planning and layout that consider avoiding critical habitat locations, or preserving them to the extent possible, could significantly reduce the impact making at least some of them avoidable.

**Climate Change** There are two areas noted in the DEIS which impact climate change:

- **Construction Activity:** For the past decade or longer, the North American design and construction community has been actively engaged in and exposed to alternative materials, products, and construction methods which directly reduce the GHG impacts of construction. This is particularly true for omnipresent materials such as concrete, aluminum, and steel which can account for the vast majority of GHG emissions. As a result, it is quite possible, today, to use low-carbon concrete which can reduce the carbon emissions of the process literally by nearly 50 percent. With an accelerated rate of development and adoption in New York State, it is entirely conceivable that very low carbon, or even no-carbon concrete may be available soon, during the construction of the first fab plant. By making low carbon concrete a required stipulation of permitting, a very significant amount of GHG emissions can be avoided. Further, the sheer quantity needed (680,000 cubic yards estimated for each fab plant) would directly impact the market offering a positive “ripple effect” for wider use of low carbon concrete in NY State, instead of producing a negative impact. The same can be said about steel, particularly structural steel and reinforcing steel. The not-for-profit organization Architecture 2030 has information on this topic - <https://www.materialspalette.org/steel/> I would propose that the use of recycled steel processed in an electric arc furnace (preferably from sustainable electricity) be a stipulated requirement of any permits. Notably, the CNY local company, Auburn Steel, has been well known for providing such steel products in the past, others are available as well.
- **Building Operations:** There is a plethora of information and knowledge about ways to design buildings, so they use less energy. Therefore, at a minimum, the buildings should be required to meet a significant level of energy use reduction as evidenced in third party certifications such as LEED® or others. Process energy is not typically included in such certifications, so if Micron is to live up to its promise of being “truly

## **Micron Project – Clay, NY**

DEIS comments prepared and submitted by

**Peter J. Arsenault, FAIA, Architect**

August 11, 2025

sustainable” then the sources of their immense energy requirements need to be sustainable. That either means renewable, non-polluting on-site energy generation (i.e., wind, solar, hydro, etc.) or purchasing renewable energy. The statement that Micron intends to use significant amounts of renewable electricity is a start, but based on the numbers in the DEIS, that only accounts for half of the total energy requirements. The other half is currently shown as being provided by natural gas or diesel -polluting fossil fuels. Converting those needs to renewable electricity or to a non-polluting alternative (i.e., hydrogen, biomass, etc.) would mean that more of the Climate Change impacts would be avoidable and would reduce their significance.

**Transportation** The unavoidable impacts cited in the DEIS related to transportation are all related to automobile and truck traffic on roadways. As noted above, the use of public transportation, mass transit, or other automobile alternatives would greatly reduce the significance of this impact and make them quite avoidable. There are countless examples of successful rubber-tire based transport (i.e., buses with “stations”), light rail, or even cable-based systems that dramatically relieve the burden on traffic. In the process, they can directly reduce air pollution from gasoline or diesel-powered vehicles, particularly if electric vehicles are used. Implementing alternatives such as these, including the option of dedicated travel lanes or travel ways, not only reduces the impacts from transportation, but they can also make the travel experience more palatable and appealing for workers, visitors, and vendors accessing the Micron plant. A greater focus on alternative modes of transportation could create more positive outcomes individually and cumulatively. Therefore, directing public or other funds towards these mass transit/ public transportation options instead of only on highway improvements can yield a notable reduction in the significance of the transportation impacts.

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**Conclusion** Based on all of the foregoing, **I submit that the list of unavoidable significant adverse effects in the DEIS is flawed.** It reflects a lack of commitment to truly sustainable planning, design, and construction and allows for the “easy way out”. **It is not appropriate for the lead agencies to accept these things as “unavoidable” when there is so much**

**Micron Project – Clay, NY**

DEIS comments prepared and submitted by

**Peter J. Arsenault, FAIA, Architect**

August 11, 2025

**evidence to the contrary** as shown in successfully constructed and operating facilities today – and with the trend to be able to do even better during the decades of construction of the Micron project. I urge you to acknowledge this reality and **make it a requirement** of the project to meet all of the currently achievable levels of sustainability as described.

---

**From:** ED - Web 1 <economicdevelopment@ongov.net>  
**Sent:** Monday, August 11, 2025 4:02 PM  
**Cc:** Davis, Jeffrey W.; Nancy Lowery; Robert Petrovich  
**Subject:** Fw: NYSDEC Comments- Micron New York Semiconductor Manufacturing Project DEIS  
**Attachments:** NYSDEC Micron DEIS Comments.pdf

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**From:** Balduzzi, Kevin M (DEC) <kevin.balduzzi@dec.ny.gov>  
**Sent:** Monday, August 11, 2025 3:56 PM  
**To:** CHIPSNEPA@chips.gov <CHIPSNEPA@chips.gov>; ED - Web 1 <economicdevelopment@ongov.net>; Yhennessey@barclaydamon.com <yhennessey@barclaydamon.com>  
**Cc:** Foster, Patrick E (DEC) <patrick.foster@dec.ny.gov>; Glance, Dereth B (DEC) <Dereth.Glance@dec.ny.gov>; Logan, Marissa G (DEC) <Marissa.Logan@dec.ny.gov>  
**Subject:** NYSDEC Comments- Micron New York Semiconductor Manufacturing Project DEIS

**NOTICE:** This email originated from **outside** of Onondaga County's email system. **Use caution** with links and attachments.

Good afternoon,

Please find attached NYSDEC's comments on the Micron New York Semiconductor Manufacturing Project DEIS.

Thank you.

**Kevin M. Balduzzi**

Regional Permit Administrator, Region 7

**New York State Department of Environmental Conservation**

**Division of Environmental Permits**

5786 Widewaters Parkway, Syracuse, NY 13214-1867

W: (315)-426-7493 | [kevin.balduzzi@dec.ny.gov](mailto:kevin.balduzzi@dec.ny.gov)

[dec.ny.gov](http://dec.ny.gov) | @NYSDEC on Social Media | [Podcast](#)



August 11, 2025

Robert Petrovich  
Onondaga County Industrial Development Agency  
335 Montgomery Street, 2<sup>nd</sup> Floor  
Syracuse, NY 13202

Dear Robert Petrovich,

The New York State Department of Environmental Conservation (DEC) offers the following comments on the joint National Environmental Policy Act (NEPA), State Environmental Quality Review (SEQR) Draft Environmental Impact Statement (DEIS) for the proposed Micron New York Semiconductor Manufacturing Project (Micron Project) and the connected actions. As an involved agency, DEC provided input on the development of individual resource sections and the evaluation of the potential environmental impacts. DEC reviewed, assessed, and provided feedback on the development of the DEIS's initial evaluation of impacts to: land use; geology/soils/topography; water resources (including wetlands); biological resources; historic and cultural resources; air quality; greenhouse gas emissions, climate change, and climate resiliency; solid and hazardous waste and materials; human health and safety; utilities and supporting infrastructure; transportation and traffic; noise and vibration; visual effects and community character; community facilities, open space, and recreation; socioeconomic conditions; environmental justice; and cumulative impacts. This iterative process occurred over several months prior to publication of the DEIS and resulted in the current state of the DEIS. DEC appreciates and encourages the continued opportunity to collaboratively review the proposed project with Onondaga County, the U.S. Department of Commerce-CHIPS Program Office, various State agencies, and the Federal cooperating agencies.

In addition to the SEQR-NEPA environmental impact review detailed in the Micron DEIS, DEC is evaluating potential environmental impacts through a concurrent review of application materials submitted by the applicants for permits under the Environmental Conservation Law (ECL) which are required for construction and operation of the Micron Project and the connected actions.

Along with this continued evaluation of potential environmental impacts through the permitting process, the following comments pertain specifically to the DEIS:

## **Geology Chapter 3.2**

The DEIS states that bed rock removal may require blasting operations as a last resort to fragment bedrock, and a blasting plan was included in DEIS Appendix E, Volume 2. DEC recommends:

- permanent blasting lines are kept clear of conductive materials such as power circuits, pipes, rails, etc., and ideally maintained at least 20 feet away from power lines;
- the NYS licensed blaster must follow standard state and federal guidelines, including air blast limits and safe ground vibration levels, which shall be protective for the surrounding structures and residences; and
- all blasts are monitored by a seismograph.

## **Water Resources Chapter 3.3**

DEC notes the discussion on Micron's wetland adaptive management plan and the proposed ground and surface water monitoring plans as best management practices during construction. DEC asked Micron to evaluate surface and groundwater resources during construction to ensure that the remaining wetlands would not be impacted by changes to hydrology. DEC appreciates that this evaluation is now included in the DEIS.

### **Wetlands**

The Freshwater Wetland Act, Article 24 of the ECL, and the implementing regulations require that a project first avoid and then minimize impacts to regulated wetlands and then mitigate for all unavoidable impacts. Chapter two of the DEIS demonstrates Micron's evaluation of alternative layouts with consideration for onsite natural resource impacts. Micron and The Wetland Trust have submitted wetland mitigation plans to DEC and the US Army Corps of Engineers to mitigate the unavoidable and irreversible loss of wetlands. DEC is working collaboratively with Micron to further refine these plans, which must mitigate for the specific wetland functions, benefits, and acres lost as part of the Micron Project. DEC recommends the Final Environmental Impact Statement (FEIS) contain the final wetland mitigation plans if there are updates or site plan adjustments.

### **Stormwater**

Micron and the Rail Spur operator are required to gain coverage under the DEC Construction General Stormwater Permit, GP-0-25-001 (CGP), which requires developing a Stormwater Pollution Prevention Plan (SWPPP) that includes the implementation of practices to protect water quality and to reduce future flooding risks associated with the project. The CGP requires the evaluation of future physical risks due to both extreme storms and climate change and installation of post-construction Stormwater Management Practices to provide stream channel protection and reduce flooding risk.

DEC and the Town of Clay will be completing a joint review to ensure that the SWPPP meets DEC technical standards and the requirements of the CGP. DEC will also be completing routine site inspections to ensure permit compliance during project

construction. DEC looks forward to the completed application being reviewed by the public prior to construction. If available, DEC recommends appending the Micron and Rail Spur SWPPP to the final EIS.

### **Wastewater**

As discussed in the DEIS, to accommodate the increase in the flowrate and the associated organic/inorganic loadings to the existing Oak Orchard Waste Water Treatment Plant (OOWWTP), Onondaga County will submit an NY-2A application to DEC for modification of the current OOWWTP State Pollution Discharge Elimination System (SPDES) permit, which will include a chemical characterization of the wastewater from all existing and new sources that the expanded facility is expected to receive and treat. Additionally, the wastewater characterization will include the admixture of any emerging contaminants that are assumed to be contained within the discharge from new industrial sources. DEC, Onondaga County, and Micron continue to work closely in the development and review of the SPDES permit modification to maintain New York State's high water quality standards. DEC recommends including any updates to the OOWWTP upgrade plans to the FEIS, as necessary and if available.

### **Chapters 3.6 Air Quality and 3.7 Greenhouse Gas Emissions, Climate Change, and Climate Resiliency**

The DEIS was published prior to the publication of Micron's Climate Leadership and Community Protection Act (CLCPA) Analysis, which was publicly noticed as part of DEC's Notice of Complete Application, Notice of Public Comment Period, and Notice of Public Comment Hearing for the Freshwater Wetlands, ECL Article 24, (implemented by 6 NYCRR Part 663); Water Quality Certification (401 certification), Section 401 of the U.S. Clean Water Act; Incidental Take of Threatened or Endangered Species, ECL Article 11, (implemented by 6 NYCRR Part 182) permits.<sup>1</sup> As such, DEC notes that there is a finer level of detail included in the CLCPA Analysis than is presently in the DEIS Air Quality or Greenhouse Gas chapters. DEC therefore recommends that the FEIS incorporate the latest greenhouse gas emissions data and information available to ensure consistency amongst the permitting documents and related CLCPA Analysis.

### **Closing**

DEC appreciates the opportunity to review the DEIS and looks forward to publication of the FEIS. The scope and complexity of the potential impacts associated with the Micron Project require a thorough and comprehensive review of environmental, social, and economic factors. In addition to submitting these comments on the SEQR-NEPA review, DEC will continue to work with the applicants and the other local, state, and federal agencies as necessary to further address potential environmental impacts of construction and operation of the Micron Project throughout the permitting process.

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<sup>1</sup> These draft permit documents, including the CLCPA Analysis, are available at: <https://dec.ny.gov/news/environmental-notice-bulletin/2025-07-16/public-notice/town-of-clay-micron-new-york-semiconductor-manufacturing-llc>.

Respectfully,



Digitally signed by Kevin  
M. Balduzzi  
Date: 2025.08.11  
15:51:02 -04'00'

Kevin Balduzzi  
Regional Permit Administrator  
Division of Environmental Permits

cc. U.S. Department of Commerce-CHIPS Program Office

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**From:** Meredith Barges <mbarges@esf.edu>  
**Sent:** Monday, August 11, 2025 8:28 PM  
**To:** CHIPSNEPA@chips.gov  
**Subject:** [EXTERNAL] ATTN: Micron Project  
**Attachments:** MicronDEIS\_Comment\_LightsOutCNY\_Aug25.docx

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Dear Directors of the Onondaga County Industrial Development Agency,

Please find attached a public comment from Lights Out Central New York regarding Micron's draft lighting plan for its proposed complex in Troy, NY.

Thank you for your kind attention to these comments and recommendations.

Sincerely,  
Meredith

--

**Meredith Barges, M.A., M.Div.**

**PhD Student, SUNY College of Environmental Science & Forestry**

Senior Fellow, [Bird Collisions in the Anthropocene](#)

Board Member, [Onondaga Audubon Society](#)

Chair, [Lights Out Central New York](#)

Co-Author, [Building Safer Cities for Birds: How Cities Are Leading the Way on Bird-Friendly Building Policy](#)

Co-Author, [Model Outdoor Lighting Regulations for Connecticut](#)



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**From:** Meredith Barges <mbarges@esf.edu>  
**Sent:** Monday, August 11, 2025 8:38 PM  
**To:** CHIPSNEPA@chips.gov  
**Subject:** [EXTERNAL] \*\*REVISED SUBMISSION WITH CORRECTED COMMENT - Micron Project  
**Attachments:** MicronDEIS\_Comment\_LightsOutCNY\_Aug25.docx

---

Dear Directors of the Onondaga County Industrial Development Agency,

Please find attached a **revised** public comment from Lights Out Central New York regarding Micron's draft lighting plan for its proposed complex in Clay, NY.

Thank you for your kind attention to these comments and recommendations.

Sincerely,  
Meredith

--

**Meredith Barges, M.A., M.Div.**

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August 11, 2025

**RE: Lighting best practices should be required at Micron’s proposed complex in Troy, NY, to protect biodiversity and lighten loads on the regional energy grid**

To Whom It May Concern:

I am writing on behalf of Lights Out Central New York to express concern about Micron Technology Inc.’s draft lighting plan for its proposed complex at White Pine Commerce Park in Clay. **Micron’s lighting plan needs to be significantly revised so that light pollution is minimized at the site during construction and operations.** Given the complex’s proposed location in a pristine, sensitive wetland area, the U.S. Department of Commerce and the Onondaga County Industrial Development Agency should require Micron to follow best lighting practices throughout the site.

All luminaires, lights, and lighting practices at the site should follow the highest industry standards. These are articulated in [LEED v5’s Interior Lighting](#) and [Light Pollution Reduction](#) credits. We recommend that Micron be required to follow these standards throughout the proposed complex, *whether or not Micron seeks LEED certification for any part of the site.*

Studies show that light pollution is growing at an alarming pace, with satellite and ground-based measurements revealing that North Americans experience more than **10% annual increases in artificial light** ([Kyba et al., 2023](#)). Artificial light at night poses serious threats to local fauna and flora, ecosystems, and also public health. Troy is located in the Atlantic Flyway, a migration route for over 300 bird species. Artificial nighttime lighting causes significant disorientation for migratory birds and associated mortality due to building collisions, while affected bird populations are in steep decline ([Rosenberg et al, 2019](#)).

Lighting doesn’t just affect wildlife—excessive nighttime lighting has also been linked to human health risks. A 2016 study from the American Medical Association warns that artificial light exposure at night is associated with increased risks of sleep disorders, obesity, depression, and even certain cancers ([Motta, 2024](#)).

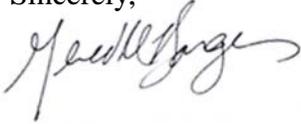
Following industry best practices, lighting should only be installed and used if absolutely necessary—no decorative or façade lighting should be allowed, particularly after 11pm. For lights deemed necessary, they must be controlled with modern technologies: automatic timers, motion sensors, and dimmers should be used that automatically turn off or dim at least 70%. All outdoor luminaires should be full-cutoff; lights should be at the lowest possible lumen level (intensity), and in warm tones (2,500K or less).

Because lighting needs can be substantial at large tech facilities, **following industry best practices would also help reduce energy demands at the complex and ease pressure on the regional grid**—and ease burdens on the local energy market affecting residential customers.

By adopting best lighting standards for both its construction and operations, Micron would avoid preventable ecological damage, help protect biodiversity, and demonstrate that it is serious about being a good neighbor that follows sustainable development best practices.

Therefore, Lights Out CNY urges the U.S. Department of Commerce and Onondaga County Industrial Development Agency to request Micron Technology, Inc. to revise the lighting plans for its proposed complex to include a comprehensive light-pollution mitigation plan, so that, if the project is approved, Micron's legacy in the area is one of environmental stewardship and conscientious lighting, not one of easily preventable harms to local biodiversity, public health, and the night sky.

Sincerely,

A handwritten signature in cursive script, appearing to read "Meredith Barges".

**Meredith Barges, MA, MDiv**  
Chair, Lights Out Central New York  
Board Member, Onondaga Audubon Society



August 11, 2025

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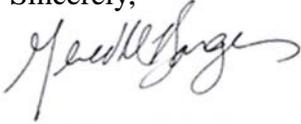
Following industry best practices, lighting should only be installed and used if absolutely necessary—no decorative or façade lighting should be allowed, particularly after 11pm. For lights deemed necessary, they must be controlled with modern technologies: automatic timers, motion sensors, and dimmers should be used that automatically turn off or dim at least 70%. All outdoor luminaires should be full-cutoff; lights should be at the lowest possible lumen level (intensity), and in warm tones (2,500K or less).

Because lighting needs can be substantial at large tech facilities, **following industry best practices would also help reduce energy demands at the complex and ease pressure on the regional grid**—and ease burdens on the local energy market affecting residential customers.

By adopting best lighting standards for both its construction and operations, Micron would avoid preventable ecological damage, help protect biodiversity, and demonstrate that it is serious about being a good neighbor that follows sustainable development best practices.

Therefore, Lights Out CNY urges the U.S. Department of Commerce and Onondaga County Industrial Development Agency to request Micron Technology, Inc. to revise the lighting plans for its proposed complex to include a comprehensive light-pollution mitigation plan, so that, if the project is approved, Micron's legacy in the area is one of environmental stewardship and conscientious lighting, not one of easily preventable harms to local biodiversity, public health, and the night sky.

Sincerely,

A handwritten signature in black ink, appearing to read "Meredith Barges". The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

**Meredith Barges, MA, MDiv**  
Chair, Lights Out Central New York  
Board Member, Onondaga Audubon Society

---

**From:** Michelle <michellerenee513@gmail.com>  
**Sent:** Monday, August 11, 2025 11:43 PM  
**To:** chipsnepa@chips.gov  
**Subject:** [EXTERNAL] Public Comment - MICRON Draft EIS 2025

The MICRON Draft EIS and Appendix L provide a baseline for construction-phase safety but lack critical operational-phase health, safety, and environmental details. As proposed, key risks to workers and the community remain unquantified and unmitigated, especially regarding PFAS, hazardous waste, and renewable energy sourcing. I urge OCIDA to require a more detailed, transparent, and enforceable plan before project approval.

Central New York's academic and medical institutions (SUNY Upstate, SUNY ESF, Syracuse University, Le Moyne, etc.) also offer unique opportunities for research and education in partnership with Micron. In addition to the recommendations below, I urge Micron to allocate research funding to local universities for independent monitoring of air emissions and water discharges, to identify less-hazardous material alternatives, to advance the science of PFAS mitigation and treatment, and to address other emerging needs not currently known.

### Worker Health & Safety During Operations

Appendix L of the Draft EIS addresses construction-phase safety in detail but contains minimal discussion of ongoing occupational health and safety programs once the facility is operational. The EIS defers post-construction health and safety planning to Micron's internal EHS programs, without providing specifics. No operational-phase exposure assessments, medical surveillance programs, or workplace monitoring plans are described, despite listing hazards such as solvents, acids/caustics, toxic metals, and radiation. Appendix L also details the maintenance of a comprehensive safety training facility within the project site, but defers this responsibility to 'The Contractor,' and limits application to construction activities. Most responsibilities contained in Appendix L are deferred to 'The Contractor.'

*Request:* Include an operational-phase Occupational Health & Safety Management Plan with: 1) formal, paid worker participation in health and safety committees, 2) employee and on-site contractor training on applicable Safety Data Sheets (SDS) in multiple languages and formats, 3) a detailed medical surveillance program managed by an occupational medicine physician, 4) air and water monitoring protocols for priority contaminants including PFAS, 5) a safety training facility and comprehensive training plan managed by Micron that includes ongoing operation of the facility beyond construction activities, 6) inclusion of at least one Certified Industrial Hygienist (CIH) as mandatory expertise on the Micron EHS team, and 7) annual public reporting of worker injury/illness rates (public access to OSHA 300 Logs), PFAS discharge, and air/water quality data.

### PFAS Use, Management, and Wastewater Treatment

The EIS acknowledges PFAS as “essential to the production of modern semiconductors,” but does not list specific PFAS chemicals or quantities to be used. Without disclosure of compound-specific data, risk evaluation for workers, the community, and downstream ecosystems is not possible. The structure of a PFAS molecule directly affects wastewater treatment feasibility. Without knowing the CAS-specific chemical structure, treatment design is guesswork. The DEIS references emerging treatment technologies but makes no commitment to complete removal of PFAS to below part-per-trillion (ppt) levels. Reliance on the proposed Onondaga County industrial wastewater treatment plant transfers a critical control measure and liability to a third party, funded by taxpayers.

*Request:* 1) Provide a full PFAS inventory (CAS numbers, use phase, annual quantities), 2) commit to the best-available treatment technology capable of ppt-level removal on-site, before industrial wastewater is passed to the Onondaga County treatment plant, 3) include PFAS in continuous effluent monitoring requirements and allocate funding for third-party verification, and 4) develop a detailed PFAS worker exposure prevention plan.

### Hazardous Waste & Worker Training

The EIS notes significant hazardous waste generation and outlines a Hazardous Waste Training Procedure, but this focuses on regulatory compliance rather than exposure prevention. No detail is provided on what specific waste streams workers will handle, and little detail is provided on how the Hierarchy of Controls will be applied to individual hazards. Micron’s Reuse, Recycle, and Recovery (RRR) program is mentioned, but lacks a discussion of hazards in reuse/recycling operations and the training needed to perform them safely.

*Request:* 1) Specify hazardous waste streams, their associated hazards, and controls, 2) make Micron’s hazardous waste procedures publicly available, and 3) require initial and annual refresher hazardous waste training for all affected employees and contractors.

### 4. Human-Centered Design & Ergonomics

Ergonomic risk is minimally referenced in the EIS and Appendix L, despite evidence that integrating ergonomics into initial facility design reduces injury rates and retrofit costs, while also improving employee performance and well-being.

*Request:* 1) Engage a Certified Professional Ergonomist during facility design - recommended ergonomics expertise includes physical, cognitive, and macro ergonomics, 2) integrate adjustable workstations, manual material handling aids, and human factors into equipment selection, and 3) include ergonomic training in both construction and operations phases.

### Stormwater, Green Infrastructure & Renewable Energy

The EIS lists general stormwater management measures but does not commit to green infrastructure best practices such as green roofs, bioswales, or permeable pavement when feasible. Renewable energy planning relies heavily on unbundled Renewable Energy Credits (RECs) without proof of availability in NYS. No plan is provided for on-site renewable generation or storage. LEED certifications are limited to office buildings, and do not extend to production facilities, where most of the energy, water, and chemical use will occur.

*Request:* 1) Incorporate site-scale green infrastructure to manage stormwater, enhance habitat, and reduce heat island effects, 2) provide a renewable energy procurement plan prioritizing new renewable capacity rather than existing RECs, 3) evaluate rooftop solar, solar windows, geothermal, and waste heat recovery potential, 4) utilize carbon-negative and carbon-neutral concrete and recycled steel where feasible, 5) document how LEED-inspired strategies (e.g., low-emitting materials, advanced ventilation, daylighting where feasible, renewable energy integration) will be adapted to the unique requirements of semiconductor manufacturing, and how LEED principals can be integrated into cleanroom and fab design, including measures to reduce toxic material use, improve indoor air quality, and recover/reuse process water, and 6) provide a public report on LEED-equivalent performance metrics for the production facilities, even if formal LEED certification is not sought for those areas.

Sincerely,

Michelle Beltran

Director of Continuing Education, Center for Occupational and Environmental Health, Berkeley Public Health

Property owner in Baldwinsville, NY 13027

---

**From:** nypragmaticenvironmentalist@gmail.com  
**Sent:** Monday, August 11, 2025 10:37 AM  
**To:** CHIPSNEPA@chips.gov  
**Subject:** [EXTERNAL] Caiazza Comments on the Micron Draft Environmental Impact Statement  
**Attachments:** Caiazza Comments on Micron EIS.pdf

I have attached my comments on the Micron Draft Environmental Impact Statement.

Roger Caiazza  
[Pragmatic Environmentalist of New York](#)  
[NYpragmaticenvironmentalist@gmail.com](mailto:NYpragmaticenvironmentalist@gmail.com)  
315.529.6711

## Caiazza Comments on the Micron Technologies Draft Environmental Impact Statement

### Introduction

I am a retired air pollution meteorologist, with extensive electric energy and environmental regulatory analysis experience as well as environmental permitting experience. I author the [Pragmatic Environmentalist of New York](#) blog where I have written over 550 articles about the Climate Leadership & Community Protection Act (CLCPA). I live less than seven miles from the White Pine Commerce Park.

Based on my background I believe that the Final Environmental Impact Statement (EIS) should include an option for an on-site Combined Cycle Gas Turbine (CCGT) powerplant that has provisions for co-generation for process heat applications. This option offers the best opportunity for a reliable, affordable generation source providing the massive amount of energy required by the facility.

### Micron Sustainability Commitments

The [July 2025 Micron Climate Leadership and Community Protection Analysis](#) (CLCPA Analysis) notes that Micron Technology is proposing to construct and operate a “leading-edge semiconductor manufacturing facility” in the Town of Clay, NY. The description of Micron’s sustainability commitments in the CCLCPA Analysis states:

Micron is an industry leader in semiconductor manufacturing and conducts its operations using both leading-edge technologies and intentional sustainability practices. As outlined in its 2023 Sustainability Report,<sup>6</sup> Micron takes a proactive approach to environmental stewardship, investing in technologies to mitigate its environmental footprint, and integrates environmental, health and safety (EHS) considerations, including energy, water and waste efficiency, Leadership in Energy and Environmental Design (LEED) criteria, and other factors into its processes, facility design, and construction. This approach is demonstrated in Micron's published goals and progress relating to emissions, energy use, water use, and waste generation worldwide.

### Energy Use

I queried [Perplexity AI for a description of energy use](#) at the facility. The following describes the massive amount of energy required:

The Micron facility represents an unprecedented energy demand for Central New York. When fully operational with all four fabrication plants (fabs) completed by around 2043, the Clay complex will consume 16 billion kilowatt-hours (16,000 GWh) of electricity annually.

The Micron facility will require 1.85 gigawatts of continuous power from the grid, operating 24 hours a day, 7 days a week. This around-the-clock operation is critical because semiconductor manufacturing cannot tolerate even brief power interruptions -

any outage would cost Micron tens or hundreds of millions of dollars in lost production and could take days or weeks to recover from.

Despite the massive energy demand, Micron and New York State have committed to meeting 100% of the facility's electricity needs through renewable energy sources. However, this commitment faces significant practical challenges:

#### Current Renewable Allocations

New York Power Authority has allocated [140 MW of hydropower](#) to Micron, representing only about 7% of the facility's total needs

Micron has signed a [178 MW onshore wind power agreement](#), providing less than 3% of total demand

Combined, these commitments leave approximately 90% of Micron's power demand still to be determined

Unfortunately, the commitment to source 100% of the facility's electricity needs through renewable energy source is more consistent with Micron's sustainability commitments than energy reality. The chip fab plant will not only require enormous amounts of electric energy but also firm capacity, stable voltage, and frequency in a narrow range. Providing electricity with those characteristics using renewable energy sources is an enormous challenge and failure risks viability of the facility.

#### **CLCPA Status**

Furthermore, New York's provisions for renewable energy are in jeopardy. The CLCPA Analysis does not acknowledge several important uncertainties associated with New York's CLCPA implementation. It is through no fault of Micron, but the reality is that there are new factors that should be considered in the plans for providing power in the final environmental impact assessment.

On July 1, 2024, Department of Public Service (DPS) Staff and the New York State Energy Research and Development Authority (NYSERDA) filed the Draft Clean Energy Standard Biennial Review (Biennial Review). The findings indicate problems with the implementation schedule that could affect the commitments for energy resources. The Biennial Review summarizes the progress made toward the renewable energy and zero emission goals set by the CLCPA since the establishment of the Clean Energy Standard. In May 2025 DPS [finalized the document](#). They found that:

### Current Progress vs. 2030 Target

New York has made measurable progress but faces a substantial gap. As of 2022, renewable energy resources supplied 25.1% of the state's electric load, totaling 38,061 GWh out of 151,836 GWh statewide load. Combined with nuclear generation, total renewable and zero-emission sources reached 46.1% of statewide load.

However, under the revised 2030 base case forecast of 164,910 GWh, the 70% renewable target requires 115,437 GWh of renewable generation. The review projects that operational and contracted renewable sources will provide only 73,292 GWh by 2030, creating a significant renewable energy deficit of 42,145 GWh.

### Timeline Implications and Delays

The biennial review concludes that achieving the 70% renewable goal by 2030 may be unavoidable to delay. Instead, the analysis suggests the target could be reached by 2033 when factoring in load growth and contributions from offshore wind and distributed generation.

To maintain trajectory toward eventual achievement, the review proposes procuring approximately 23,486 GWh through six Tier 1 solicitations between 2024 and 2029. This requires increasing annual procurement from the current 4,500 GWh per year to 5,600 GWh per year when accounting for project attrition.

The Biennial Report issued in July 2024 was based on an assessment of potential renewable energy deployments at a time when there was significant federal financial and regulatory support available from the Biden Administration. It is not currently clear at this time what, if any, support will be available from the Trump Administration, but there is no question that there will be significant change to renewable deployments. These uncertainties were not incorporated into the Order that accepted the Biennial Review. This makes the proposal to double down on renewable procurements unlikely to succeed.

There is another recent issue that results in additional unacknowledged uncertainty in Micron's plans. A [Perplexity AI response](#) notes that Governor Hochul recently acknowledged that the Biennial Review findings mean that the current schedule is untenable and that there are significant cost impacts. Proponents for clean energy are arguing that the CLCPA targets are legal mandates but there are heretofore unacknowledged legal safety valves.

Public Service Law [Section 66-P Establishment of a Renewable Energy Program](#) is the law that implements the Climate Act renewable energy mandates. It includes provisions for bounds on

implementation. PSL 66-p(2),b states “The commission may, in designing the program, modify the obligations of jurisdictional load serving entities and/or the targets upon consideration of the factors described in this subdivision.” Section 66-p (4) states: “The commission may temporarily suspend or modify the obligations under such program provided that the commission, after conducting a hearing as provided in section twenty of this chapter, makes a finding that the program impedes the provision of safe and adequate electric service; the program is likely to impair existing obligations and agreements; and/or that there is a significant increase in arrears or service disconnections that the commission determines is related to the program”.

Since I drafted these comments a [letter](#) written by two Climate Action Council members to the Chairman of the Public Service Commission came to my attention. Their recommendations are consistent with my findings. The existence of those safety valve provisions, the acknowledged program delays, and the current changes in Federal clean energy policies suggest that Micron must consider an alternative plan for sourcing its energy requirements.

### **Recommendation**

The current energy sourcing plan is to rely on the local utility (Niagara Mohawk Power Corporation [NMPC] doing business as National Grid) as the source of energy for the facility. This recommendation is based on the [Independent Intervenor Statement in Opposition to the Joint Proposal](#) (Opposition Statement) in the NMPC rate case. In that statement we described an alternate approach for NMPC to provide electric power to Micron. The Opposition Statement projected the necessary renewable resources needed for Micron’s energy requirements in comparison to an alternative approach.

Public Service Law 66-P mandates renewable generation which would consist of a combination of onshore wind power, large scale solar, short-term energy storage and a currently unavailable Dispatchable Emissions-Free Resource (DEFER) for long duration, low renewable resource availability episodes. To provide the high-quality electricity necessary for the Micron facility, ancillary support services that provide support for things like inertial stability using synchronous condensers and flywheels will be needed. The nameplate generation capacity of these resources must be significantly greater than today’s installed reserve margin to account for the intermittency of wind and solar. The expected lifespan of these resources is significantly less than today’s electric energy resources. These factors combine to raise serious questions about the viability of the current renewable energy plans for the New York electric system.

In addition, although these renewable resources and associated components are commonly claimed to be “carbon free”, they in fact have a considerable GHG footprint associated with

their manufacture, installation, operation, and decommissioning. In the example cited, the PSL 66-P footprint exceeds 30 million metric tons. And based on available cost metrics, the [LCOE](#) will exceed \$150/MWh.

I recommend that the Final EIS include an option using a current generation Combined Cycle Gas Turbine (CCGT) powerplant. A facility with a nameplate rating of 1.25 GW will provide equivalent output to the PSL 66-P renewable energy approach with the same or better reliability, but without the need for energy storage or inertial support. The chip fab manufacturing process requires process heat. It is not as energy efficient to use electricity from the grid to generate process heat as using on-site combustion. On-site generation also eliminates transmission line loss. These efficiency benefits warrant consideration of this option.

Properly maintained, the CCGT will have a lifespan exceeding 40 years - adjusting to match the same equipment lifespan as the renewable assets described above. If the full life cycle of GHG emissions is considered, the GHG footprint associated with the manufacture, construction, routine O&M, and decommissioning is projected to be less than 5 million metric tons. Applying a similar adjustment for equivalent energy output over a 25-year lifespan, the GHG footprint of the natural gas extracted from Appalachian sources is roughly 130 million metric tons. The LCOE for the CCGT alternative is \$50/MWh based on [similar projects](#).

At first glance, the net sustainability benefit of the PSL 66-P approach is 105 million metric tons. But accounting for just the life cycle carbon footprint of the incremental difference in LCOE, the savings [drops](#) to 70 million metric tons. If the CCGT facility is co-located with an agricultural park that uses the CO<sub>2</sub> from the power plant to [boost productivity](#), the net savings plunges to 10 million metric tons - which is barely 7% of the savings claimed by the CLCPA. This natural gas alternative may be more sustainable than the renewable energy approach when properly considering all the lifecycle effects.

There is yet another advantage to the natural gas powerplant option. If new nuclear baseload generation is developed during the operational life of the CCGT powerplant, the CCGT can be converted to operate on any fuel mixture up to 100% hydrogen, capturing excess renewable production through on-site electrolyzers and providing dual-fuel redundancy for additional grid reliability. While the round-trip efficiency of hydrogen electrolyzers is lower than other options, there is a net sustainability benefit associated with the reuse of an existing generation asset and transmission infrastructure compared to new-built battery energy storage or other DEFR technologies.

The lack of boundary conditions on PSL 66-P implementation plans precludes a pragmatic solution that provides similar benefits at a lower cost. This example is emerging as a [preferred low carbon solution](#) in other areas of the U.S. and abroad. The significant tradeoffs of PSL 66-P should be included in the Final EIS because it is likely that the CLCPA schedule and ambition will be modified. Micron's commitment to meet 100% of the facility's electricity needs through renewable energy sources is laudable but indications are that it is not going to be feasible.

### **Conclusion**

There is growing evidence that the schedule and ambition of Public Service Law 66-P renewable energy program deployment cannot be achieved. The existence of safety valve provisions, the acknowledged program delays, and the current changes in Federal clean energy policies suggest that Micron must consider an alternative plan for sourcing its energy requirements. If Micron is to truly lead, then they must advocate for options that will work. Blind adherence to a flawed net-zero transition plan will affect the viability of the plant. It is time to step up and offer a pragmatic solution that will work. The CCGT approach with co-generation and agricultural park option fulfills that objective.

## **CNY CHAPTER - NYS ALLIANCE FOR RETIRED AMERICANS**

**4983 Brittonfield Parkway**

**East Syracuse, NY 13057**

August 11, 2025

ATTN: Micron Project  
Onondaga County Industrial Development Agency (OCIDA)  
335 Montgomery Street, Floor 2M  
Syracuse, NY 13202

CNY Chapter of NYSARA, representing thousands of retired educators in Central New York, welcomes Micron as a good neighbor. To ensure that relationship is a long and beneficial one to both parties, we ask that certain guidelines be established.

CNY Chapter of NYSARA, along with many other union, environmental, workforce, public health and safety organizations ask that the organizations that control Micron's development in Central New York take into consideration workplace safety; creation of good paying jobs in a union- accepting climate; no adverse impact on school funding; environmental quality and continued monitoring; good housing and transportation.

First, the health and safety from toxic chemicals used to make chips must not pollute air, soil, fish, wildlife, and drinking water. A long term, continuing monitoring of this must be in the plan with enough resources to sustain it.

Second, commit to ensuring that clean water and energy in abundance will be affordable to the area into the future. Ratepayers should not shoulder the burden. Also, generate renewable energy with a low carbon impact.

Third, safe working conditions are necessary. We know the workers will be exposed to toxic chemicals and all measures must be taken for their sake as well as their families.

In addition, we seek pay equity, and a diverse workforce that would be allowed to unionize without adverse ramifications. To further aid working families, public transportation and child care on site or near would be helpful.

Fourth, invest in housing needed for existing and new residents. Mixed income and affordable housing will be needed, and micron must be involved in a cooperative effort to bring that about.

Fifth, tax abatements to Micron must not come at the expense of schools and students.

According to a report issued by "Good Jobs First NY" schools lost a total of \$ 1.8 billion in property tax revenue due to tax abatements granted by IDAs.

We would appreciate support and actions on these guidelines. We look forward to your response.

Sincerely,

CNY Chapter of NYSARA



---

**From:** CNY Solidarity Coalition <cnysolidarity@gmail.com>  
**Sent:** Monday, August 11, 2025 6:32 PM  
**To:** chipsnepa@chips.gov  
**Cc:** climatejustice-cnysolidarity@lists.riseup.net  
**Subject:** [EXTERNAL] Micron DEIS comments  
**Attachments:** Micron DEIS Comments CNY Solidarity Coalition.pdf

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See attached comments



## MICRON SEMICONDUCTOR MANUFACTURING PROJECT, CLAY, NY, DRAFT ENVIRONMENTAL IMPACT STATEMENT (JUNE 2025)

This document provides comments on the Draft Environmental Impact Statement (DEIS) by CNY Solidarity Coalition, 226 Teall Ave, PO Box 6137, Syracuse, NY 13217, [cnysolidarity@gmail.com](mailto:cnysolidarity@gmail.com)

### 1. Wetlands

- a. Micron will destroy about 200 acres of wetlands.
- b. These wetlands have many benefits
  - i. Habitat for endangered species, including the **Indiana bat** and the **Northern Long-eared Bat**, both of which are listed as endangered species under federal and New York State law. Other bat species detected on the site include the little brown bat, big brown bat, tri-colored bat, eastern red bat, hoary bat, and silver-haired bat.
  - ii. Many species of insects and birds
- c. What is Micron proposing
  - i. Replace wetlands with a series of unconnected parcels that will develop over time into wetlands. This development could take a generation. What does that mean for the flora and the fauna whose habitat has been destroyed?
- d. The area around the plant site is prone to flooding. The wetlands provide a buffer to manage surface water during heavy rain. The existing plant will cover 1400 acres between the buildings, the parking lots and other hard surfaces. There has already been testimony at public hearings that flooding is an issue in the area around the location of the proposed Micron plant. This is in spite of the presence of the wetlands which help to reduce flooding by providing a water sink during heavy rains. However, no mention has been made in the DEIS of settling ponds to deal with water runoff or other efforts to mitigate the clearly increased potential for flooding in the area.
- e. The DEIS proposes parking lots capable of handling 12,000 vehicles. According to a calculation by the University of Tennessee ([University of Tennessee Parking Calculation](#)), one acre of land can accommodate about 150 standard sized cars. For a parking lot accommodating 12,000 vehicles, that translates to about 80 acres. However, the actual area required is likely to be at least 90 acres. We are proposing a significant role for mass transit to bring workers to the plant and hopefully reduce the parking requirements by at least 50%. This will reduce hard surfaces by at least 45 acres and subsequently reduce water runoff mitigation required. In addition, we propose using porous surface material in the parking lots and internal roadways to further reduce runoff.

### 2. PFAS and other chemical compounds

- a. PFAS refers to a family of chemicals that are highly toxic and chemically stable (thus the nomenclature “forever chemicals”) There are over 10,000 thousand of these compounds and only a few have been characterized. Only two of these compounds are currently listed as toxic by the EPA, PFOA and PFOS
  - i. There is no identified lower limit to their toxicity. A few parts per trillion is still considered toxic
- b. They will be used in the chip-making process
- c. They will be present in the wastewater that will be sent to the improved Oak Orchard Water Treatment Plant in Clay. The treated water will be discharged into public waterways which will eventually lead to the Oswego River and Lake Ontario. The discharge point in Lake Ontario is within 2 miles of the intake ports for domestic water from Lake Ontario for Onondaga County.
- d. It is unlikely that the PFAS in the water passing through that plant will be removed by the processes in the plant.
- e. PFAS will also be present in solid waste that will be removed from the site to a landfill, not yet identified. Micron must ensure that no PFAS can enter the ground and potentially contaminate the existing water table.
- f. Many other hazardous chemicals will be used in the Fabs. Some, but not all, have been identified by Micron. Many have not.
- g. Micron must use the most effective processes to destroy PFAS and other toxic chemicals before they leave the plant, regardless of their cost. No PFAS must be allowed to enter the public waterways of New York State.
- h. Micron must also plan to invest in improved PFAS destruction processes as they become available over time.

### 3. Energy

- a. Micron will use as much electricity as the states of Vermont and New Hampshire combined, or the equivalent of more than 1 million homes or the entire output of a nuclear power plant.
  - i. By itself, Micron will increase the state’s energy usage by 5%
- b. Micron is subject to the provisions of New York’s landmark CLCPA legislation, which requires zero greenhouse gas emissions from electricity generation by 2040.
- c. Micron has pledged to use 100% renewable electricity
  - i. The only way it can do this is by increasing renewable energy through solar, wind, and geothermal generation.
  - ii. Renewal energy credits do not actually increase generation and should not be allowed to meet the goal of 100% renewable energy.
- d. Micron should not use electricity from existing nuclear power plants. All that does is divert that electricity from other users and does not increase generation. Although nuclear power does not generate greenhouse gases during the electric generation process, large amounts of nuclear waste are generated and the time it will take and the cost to build the nuclear generating plant could be used to create sufficient renewable energy sources that will meet Micron’s needs without the negative effects of nuclear power.
- e. The DEIS does not ensure that Micron’s massive demand for water and electricity won’t result in increased costs for ratepayers in terms of increased water and electricity rates. The DEIS must address the potential for these increases and ensure that they do not burden New York’s residents with them.

---

**From:** Katherine Cohn <katherine@chipscommunitiesunited.org>  
**Sent:** Monday, August 11, 2025 10:49 PM  
**To:** chipsnepa@chips.gov  
**Cc:** Judith Barish; Brenda Rodriguez; Rand Wilson  
**Subject:** [EXTERNAL] CHIPS Communities United Response to Micron Draft Environmental Impact Statement (New York)  
**Attachments:** CCU Response to Micron DEIS\_Aug11\_2025.pdf

Dear CHIPS Program Office,

Please find attached CHIPS Communities United's response to the Draft Environmental Impact Statement for Micron, New York.

Please do not hesitate to contact me at this email if you have any questions or would like further information.

Sincerely,  
Katherine Cohn

\* \* \* \* \*

Katherine Cohn (she/her), Policy Analyst  
[katherine@chipscommunitiesunited.org](mailto:katherine@chipscommunitiesunited.org)  
[www.chipscommunitiesunited.org](http://www.chipscommunitiesunited.org)



The US is spending billions of dollars to expand semiconductor manufacturing.  
Let's make sure this investment benefits all of us.

# CHIPS Communities United Response to Micron DEIS

August 11, 2025

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# 1. Introduction

CHIPS Communities United (CCU) is a national coalition of labor, environmental justice, public health, and community organizations working to ensure that semiconductor manufacturing supports healthy, equitable communities. We advocate for policies that prevent environmental harm, protect workers, and ensure that publicly funded investments deliver meaningful benefits to the people most directly affected by this industry.

Micron's New York project represents a generational public investment, with over \$20 billion in state and federal subsidies anticipated. Given this unprecedented scale, the Draft Environmental Impact Statement (DEIS) must offer transparent and enforceable protections for worker health, environmental safety, community well-being, and public accountability. Unfortunately, the DEIS fails to meet that bar. While it includes extensive detail in some areas, it omits or defers critical information in others. It consistently avoids enforceable commitments in favor of general promises and aspirational goals.

In partnership with environmental, labor, and public health groups, CCU seeks to address this gap through the Community Vision for Strong Environmental, Resident, and Worker Protections.<sup>1</sup> This document was developed with local leaders and community organizations with expertise in public policy, environmental law, workforce development and safety, environmental and chemical science, energy technology and infrastructure, and housing and transportation equity.

Given the project's scale and the range of potential impacts, we strongly urge the U.S. Department of Commerce and the Onondaga County Industrial Development Agency to extend the comment period to October 25 2025, at a minimum. This request is further supported by a petition signed by over 1,500 residents of the region.<sup>2</sup> Despite the limited current comment period, we submit this comment to ensure that the Micron project meets its promise to Central New York—not only by creating jobs and growing the economy, but also by protecting residents from toxic exposures, displacement, and climate risks. The following sections outline our specific concerns and recommendations.

**It should be noted that this comment does not include detailed discussion of PFAS-related concerns. These issues are being addressed separately in a dedicated comment submitted on our behalf by Earthjustice and co-signed by Earthjustice, National Resources Defense Council, and the Atlantic Chapter of the Sierra Club.**

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<sup>1</sup> "Community Vision for Strong Environmental, Resident, & Worker Protections: Micron Environmental Review" 2025. Action Network. [https://actionnetwork.org/petitions/community-vision-for-strong-environmental-resident-worker-protections-micron-environmental-review?source=direct\\_link&](https://actionnetwork.org/petitions/community-vision-for-strong-environmental-resident-worker-protections-micron-environmental-review?source=direct_link&).

<sup>2</sup> Mooney, Natalie. 2025. "Petition delivered to 'make Micron do right' on environmental review." *Spectrum News*, June 26, 2025. <https://spectrumlocalnews.com/nys/central-ny/news/2025/06/26/advocates-deliver-petition-to--make-micron-do-right--on-environmental-review>.

## 2. Scope and Alternatives

Micron has described this project as the largest single private investment in New York history, involving \$100 billion in capital investment over 20 years of phased construction. Yet the DEIS fails to adequately evaluate alternative project scales.

The DEIS identifies a "Preferred Alternative" involving the construction and operation of four fabs, but dismisses the Reduced Scale Alternative (two fabs) on the basis of Micron's claimed need to produce 52,000 wafers per week. However, this assumption is undermined by Micron's June 2025 announcement of new fabs in Boise, Idaho and Manassas, Virginia (see: <https://boisedev.com/news/2025/06/12/micron-boise-second/>). These projects suggest that Micron's production goals could be met through other means.

Under NY SEQRA law, the purpose of examining a range of alternatives is to identify ways to reduce environmental harms. The SEQRA Handbook explains that a reduced scale should be considered when:

1. Environmental impacts can be avoided or reduced by a smaller project size;
2. The smaller project still serves the intended function; and
3. The reduced scale may lower profits but does not make the project infeasible.

All three conditions apply here. A smaller footprint would reduce water usage, emissions, waste, and energy consumption—each of which scales with fab capacity. A two-fab complex would still meet Micron's goal of regional DRAM production and could be scaled up in later phases after demonstrating operational success.

In light of the phased buildout and evolving technological landscape, it is also critical that the environmental review process accounts for future changes. The DEIS itself acknowledges the "rapidly evolving PFAS wastewater treatment technology," and by the time the third and fourth fabs are built, there will almost certainly be advances in PFAS remediation, chip production processes, and our broader understanding of PFAS-related health and environmental risks. Given this, we ask: how will OCIDA account for new information or changed circumstances while the Project is under construction? Unless the Reduced Scale Alternative is adopted, there should be an enforceable commitment to conduct a Supplemental Environmental Impact Statement before approvals are granted for the third and fourth fabs are approved.

Therefore, we urge the agencies to revise the DEIS to fully assess a Reduced Scale Alternative consistent with SEQRA requirements. Unless the Reduced Scale Alternative is adopted, the DEIS should include a clear and enforceable mechanism to re-evaluate project impacts before approving construction of the third and fourth fabs—such as a commitment to conduct a Supplemental Environmental Impact Statement based on new information and technological developments.

### 3. Hazardous Substances and Wastewater

The DEIS's treatment of hazardous substances and wastewater is dangerously superficial given the chemical-intensive nature of semiconductor manufacturing. CCU calls for full chemical transparency, detailed characterization of waste and emissions, and use of best available technologies to minimize health and environmental harms. These protections must be enforceable and monitored by independent third parties, not left to Micron’s discretion.

#### A. Hazardous Substances and Chemical Inventory Transparency

The DEIS does not identify the specific chemicals Micron will use, store, or discharge. Table 3.8-9 offers generic chemical classes (e.g., "toxic gases," "liquid corrosives") with no specificity. The DEIS needs to list the identity and quantities of these chemicals to properly define health and safety risks for both workers and the surrounding community. Moreover, the environmental impacts of a sudden release of hazardous chemicals can only be assessed if the identity and potential quantities are given in the final Environmental Impact Statement (EIS) for which the DEIS is a draft.

The NIST Programmatic Environmental Impact Statement (PEIS) for Modernization and Expansion of Existing Semiconductor Fabrication Facilities (NIST 2024) offers a clear example of the level of detail that should be required. Appendix D of that document includes ten pages listing nearly 200 “representative” chemicals used by the semiconductor industry, all of which are subject to the Toxic Substances Control Act (TSCA). Table 3.8-1 of the NIST PEIS offers further specifics on hazardous chemical use and storage, shown here:

Table 3.8-2. Hazardous Process Chemicals Used in Semiconductor Manufacturing

| Chemical Category                            | Use(s)                                                                                                                                                                                       | Process Chemical                                                                           | Hazard Class                       |
|----------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------|------------------------------------|
| Aqueous solutions (commonly acids and bases) | To wet-etch or clean the surface of the wafer; as part of the photolithography process.                                                                                                      | Hydrochloric acid, HF, sulfuric acid, nitric acid, ammonium hydroxide, potassium hydroxide | 8 Corrosive Material               |
|                                              |                                                                                                                                                                                              | Ammonium fluoride                                                                          | 6.1 Poisonous Materials            |
|                                              |                                                                                                                                                                                              | Hydrogen peroxide                                                                          | 5.1 Oxidizer                       |
| Specialty gases                              | As precursors to deliver a substance such as arsenic or tungsten onto the wafer or into the silicon lattice (used in small quantities); to dry-etch a pattern onto the surface of the wafer. | Silane                                                                                     | 2.1 Flammable Gas                  |
|                                              |                                                                                                                                                                                              | Ammonia, nitrogen trifluoride, sulfur hexafluoride                                         | 2.2 Non-Flammable Compressed Gas   |
|                                              |                                                                                                                                                                                              | Ammonia, phosphine, tungsten hexafluoride, arsine, CO, fluorine, chlorine, diborane        | 2.3 Poisonous Gas                  |
| Organic compounds (commonly solvents)        | As constituents in specialty chemicals; to clean the wafer; as part of the photolithography process.                                                                                         | Isopropanol, xylene, propylene glycol ethers, acetone                                      | 3 Flammable and Combustible Liquid |
| Metallic compounds                           | Applied to the wafer in specific locations to create transistors; to plate wafers to provide electrical connections.                                                                         | Copper sulfate                                                                             | 9 Miscellaneous Hazardous Material |

Sources: ISMI, 2006; 49 C.F.R. Part 172; EPA, 2022a.

In contrast, the Micron NY DEIS (p. 3-244) lists only eight chemicals—ammonium hydroxide, anhydrous ammonia, hydrogen, hydrogen chloride, silane, chlorine, dichlorosilane, and HF—that meet the narrow definition of “extremely hazardous substances” above applicable threshold quantities. Fewer than ten other chemicals are even mentioned (pp. 3-237, 3-239). This is completely inadequate to assess potential impacts.

For example, Table 3.8-10 (p. 3-242) indicates each fab will store 13.5 million gallons of “liquid corrosives.” But what corrosives? Sulfuric acid and ferric chloride both qualify, but pose drastically different hazards. Likewise, the DEIS says 94,600 pounds of “toxic gases” will be stored at each fab—without clarifying whether these include deadly gases such as arsine or phosphine (commonly used in the chips industry per NIST 2024, Table 3.7-1).

CCU urges Micron to publish a full chemical inventory including:

- All process and maintenance chemicals to be used or stored onsite;
- Estimated quantities by phase of construction and operation;
- Chemical-specific storage, use, and disposal plans.

This list must include extremely hazardous substances regardless of federal threshold quantities, as even small leaks can pose major risks. Transparency is necessary not only for environmental review but also to protect workers, emergency responders, and the surrounding community.

Moreover, while Micron’s 2024 Sustainability Report (Appendix K, Vol. 2, p. 395) mentions a “rigorous review and approval process” for hazardous and restricted substances, the DEIS does not disclose what this process entails. The report references tracking Micron’s “chemical use profile” and efforts to eliminate or reduce chemicals, but none of this data is shared. No decision criteria, oversight mechanisms, or lists of restricted substances are included in the DEIS. The DEIS provides no examples of what substances have been phased out or what alternatives are being considered. Without transparency, these claims cannot form the basis for public trust or regulatory compliance.

Micron also describes having a team of subject matter experts identify emerging hazardous substances and eliminate them before regulatory bans take effect. This proactive stance should be commended. But again, the underlying criteria, procedures, and outcomes remain confidential. In a rapidly evolving chemical landscape where regulators often lag behind science, this internal hazard evaluation process could be a crucial safeguard. This is important information to share with the public and with regulators. If Micron has developed its own internal review process to identify chemicals that should be restricted or eliminated, this is critical information that the public and regulators need. Without transparency, these claims cannot serve as the basis for regulatory trust or community protection.

## B. Missing Implementation Plans, Documentation Failures, and Public Access Barriers

The DEIS references several key programs—such as hazardous waste reduction plans, contingency plans, and chemical approval protocols—but offers no documentation or evidence of implementation. These omissions are especially troubling given the extensive public concern around hazardous chemicals expressed during the SEQRA comment period.

While the DEIS announces a goal of “near-zero hazardous waste-to-landfill” by 2030, it includes no implementation plan, timeline, or metrics to track progress. There is no public explanation of how “near-zero” is defined, whether PFAS-containing waste is included, or what accountability mechanisms exist. If the landfill diversion strategy primarily involves shipping hazardous materials offsite to third-party contractors like Veolia (DEIS p. 3-237), this merely relocates the environmental burden—often to communities with less political and economic power.

This displacement is unacceptable. Veolia has a documented record of environmental violations and is currently facing class action litigation related to the Flint water crisis. If these materials are ultimately incinerated, that presents new risks: incineration generates toxic air emissions and PFAS-laden ash. This is why the Department of Defense decided to move away from burning firefighting foam. Waste-to-incinerator should not be the solution to landfill reduction because it may still cause environmental harm.

The DEIS also fails to provide access to the very documents it claims will guide environmental protections. For instance:

- Appendix K references hazardous waste procedures and universal waste plans, but links require password-protected logins (Vol. 2, p. 454);
- Other links—such as for job hazard analysis information—lead to broken webpages (Vol. 2, p. 452);
- Legally required plans under NYSDEC regulations—like the “Hazardous Waste Reduction Plan,” “Hazardous Waste Contingency Plan,” and “Hazardous Waste Procedure”—will not be prepared until six months before operations begin (p. 3-238).

Public commenters and agencies requested far more disclosure. For example:

- NYSDEC Comment 23 requested an evaluation of chemicals used in manufacturing and whether alternatives could reduce hazardous waste. The DEIS response redirected to prior comments but failed to answer the core question about safer alternatives. (Appendix A-D, p. 67)
- Public Comment 4 (on Water Resources) asked for identification of chemicals in wastewater, regardless of volume. The DEIS again deflected, providing no clear list or mitigation plan. (Appendix A-D, p. 79)

This pattern of omission suggests a structural unwillingness to disclose basic information about chemical hazards at one of the largest proposed semiconductor fabs in the country. It undermines trust in the DEIS and impedes meaningful public engagement.

### C. Hazardous Waste Generation and Disposal

The DEIS projects 50,300 tons of hazardous waste annually at full buildout. Yet it provides only vague categories like “acidic waste” and “solvent waste” (DEIS p. 3-236). Table 3.8-7 gives volumes but no chemical identities or densities. A rough conversion (using water density to represent acidic waste and acetone and isopropyl alcohol density to represent solvent waste) suggests that over 9,500 tons of annual hazardous waste remains unaccounted for. This therefore begs the question: What chemical waste accounts for the missing 9,500 ton/year of hazardous wastes estimated for each fab? What are the solvents? What are the acids? What is the rest of the waste?

Table 3.8-8 lists categories such as “glues,” “lab waste,” and “resins,” but again omits quantities and chemical identities. The lack of clarity makes it impossible to evaluate risk or ensure proper treatment.

The DEIS (p. 3-239) states that some chemicals and hazardous waste will be recycled while others will be sent to kilns for fuel blending, or incinerated. Micron should be commended for reuse efforts. However, much more detail is needed about:

- Specific chemicals by type and volume;
- Which waste streams will be incinerated versus recycled;
- Destination facilities and vendors, including Veolia.

CCU is particularly concerned about the incineration of “non-recyclable” wastes with no accountability for hazardous emissions or ash disposal. Fluorinated compounds should never be incinerated due to risk of toxic byproducts. Micron should:

- Segregate PFAS-containing materials;
- Prohibit incineration of these wastes;
- Characterize incinerator byproducts and monitor for destruction efficiency.

### D. Air Emissions and Thermal Oxidizer Byproducts

The DEIS assumes thermal oxidation and RCTOs will sufficiently destroy high-global warming potential (GWP) gases. However, NIST’s 2024 Environmental Assessment for the Micron fab in Boise acknowledges that destruction and removal efficiency (DRE) for point-of-use abatement systems can be as low as 60%, depending on the gas.

These systems also emit unregulated products of incomplete combustion (PICs), including fluorinated organic compounds and hydrogen fluoride (HF)—a highly corrosive and toxic substance. This is why the Department of Defense moved away from incinerating PFAS firefighting foam.

Micron and NYSDEC must:

- Disclose estimated DREs for each fluorinated gas;
- Quantify and characterize PICs and HF emissions;
- Instead of burning fluorinated gasses, capture and dispose of them using technologies that destroy the carbon-fluorine bond without the formation of additional PFAS or other hazardous byproducts.

## E. Wastewater Sludge and Industrial Pretreatment

The DEIS proposes sending non-hazardous sludge from on-site wastewater treatment to beneficial reuse vendors (DEIS Table 3.8-5), but does not explain what contaminants will be present. Prior drafts estimated over 67,000 tons of sludge and metals annually, yet the public version omits quantity projections.

This sludge may contain PFAS, heavy metals, resins, fluorides, and microplastics. Yet there is no analysis of:

- The feasibility of actually re-using the sludge and the environmental consequences of doing so;
- Whether it will be tested for hazardous substances to determine whether it should be classified as hazardous waste;
- How reuse vendors will prevent contamination of soil, water or wildlife;
- Where the sludge will go and under what regulatory oversight.

CCU urges NYSDEC and Micron to disclose the expected quantity and composition of all sludge, require routine testing, and prohibit any reuse or land application without demonstrating it is safe. No beneficial use should proceed without prior contaminant screening.

## 4. Emergency Preparedness

Emergency planning at this scale of development cannot be vague or reactive. It must be proactive, transparent, and built in coordination with first responders and impacted communities. Without detailed emergency response and flood preparedness plans, the DEIS falls short of protecting public safety and environmental integrity.

## A. Emergency Preparedness and Risk Management

The DEIS outlines general commitments to implement a Risk Management Plan (RMP) and coordinate with the Syracuse Fire Department's hazardous materials unit. The DEIS states that Micron expects its RMP to cover eight federally regulated substances, including hydrogen fluoride (HF), chlorine, and anhydrous ammonia (DEIS p. 3-239). However, it omits other substances commonly used in fabs, such as arsine and phosphine, which may be lethal in small concentrations and are subject to more stringent thresholds under California's regulations.

Key questions remain unanswered:

- Will the RMP include all regulated substances and extremely hazardous substances regardless of federal thresholds?
- Will dispersion modeling be conducted to assess risks to nearby childcare centers, homes, or schools?
- Will local fire departments have adequate staffing, resources, and training to respond to semiconductor-specific chemical emergencies?

Micron should also clarify how it will ensure rapid notification and evacuation protocols for surrounding communities.

CCU recommends:

- Including a full chemical inventory in the RMP and emergency response planning;
- Providing financial support for staffing and equipping local hazmat responders;
- Committing to annual joint training exercises with local agencies and third-party evaluators.

## B. Flooding and Stormwater Risks

The DEIS significantly underestimates the risk that increased impervious surfaces and extreme rainfall could pose to the Micron site and surrounding communities.

The project will replace 200 acres of wetlands and approximately 8,000 feet of streams with 645 acres of impervious surface, sharply reducing local capacity to absorb stormwater. The proposed wetland mitigation sites are *not downstream* from the facility and will not reduce downstream flood risk.

The DEIS claims that a "stormwater management plan" will be developed, but provides no modeling or specific mitigation measures for increased downstream flood risk. Communities like Phoenix, Fulton, and neighborhoods near Stearns Road already experience flooding, and First Street Foundation data shows these areas face increasing flood exposure.

Moreover, the DEIS does not evaluate how climate change-induced extreme precipitation events—like those recently seen in Texas—might impact open containment systems or underground infrastructure during fab operation.

CCU recommends:

- Modeling downstream flood risk under current and post-construction conditions using climate-adjusted rainfall scenarios;
- Public release of the Stormwater Pollution Prevention Plan (SWPPP) and site grading plans;
- A commitment to upstream and downstream flood mitigation infrastructure that accounts for both Micron and regional development impacts;
- Integration of green infrastructure, permeable surfaces, and on-site water capture technologies into facility design.

Absent clear and enforceable flood mitigation measures, Micron risks exacerbating regional flooding while placing vulnerable communities in harm's way. Emergency preparedness planning must include climate-related flood risk.

## 5. Community Health, Jobs and Livability

Protecting the health and safety of workers must be central to the Micron project, yet the DEIS provides inadequate detail to assess operational risks or ensure strong safeguards. Significant gaps in transparency, monitoring, and enforceable protections leave workers—especially those most exposed—vulnerable to preventable hazards.

### A. Occupational Health and Worker Safety

#### *Absence of Job-Level Detail and Chemical Risk Transparency*

The DEIS includes high-level language about its Global Environmental Health and Safety (EHS) programs and commitment to worker health, but it fails to provide the operational detail needed to evaluate occupational safety at scale. Approximately 9,000 permanent on-site operational jobs are projected for the Micron campus at full buildout, but the DEIS only offers broad categorizations of these roles (e.g., manufacturing, IT, security, procurement, etc.) (pp 3-488-3-489). There is no breakdown of tasks by job category and no risk assessments tied to specific roles or workstations. In both the main DEIS and Appendix L, chemical-specific hazards are not identified by process stage, job title, or department. Instead, the DEIS relies on general references to OSHA standards and mentions that risk matrices will be developed internally (Appendix L, p. 8)—without sharing examples, criteria, or reporting mechanisms. This lack of detail is especially concerning for maintenance and support personnel—including contractors—who may not work full time in hazardous areas but are often the most exposed

during equipment servicing, material handling, or emergency response. While much of Micron wafer handling will be automated, maintenance and supply personnel, including contractors, will be on the frontlines of exposure. These may include people who do not routinely work in hazardous areas. Unless they are adequately trained and provided with protective equipment, the more protective chemical-specific environmental standards should be applied. Without job-specific risk assessments and targeted protective measures for these roles, key exposure risks may go unrecognized and unaddressed.

#### *Illness Rates*

Equally concerning is the absence of illness rate data. While the DEIS discusses injury rates, it does not include information about illness rates (Appendix K, Vol. 2, p. 447). This is a major omission. Many occupational exposures—especially to chemicals—manifest as illnesses, not acute injuries, and these should be captured and reported alongside injury statistics. We ask that Micron’s occupational health clinic not only provide care, but also collect and share de-identified illness data in a format compatible with public health tracking. While injury statistics are discussed, the DEIS does not include information about illness rates (Appendix K, Vol. 2, p. 447)—chronic, chemical-related or otherwise—despite the well-known potential for semiconductor workers to develop occupational diseases due to long-term exposure to toxic substances.

#### *Industrial Hygiene Monitoring*

Micron pledges to apply the most protective occupational exposure limits (OELs) across the facility (p. 3-258) and to revise standards within 90 days of new, more protective thresholds (p. 3-259). OELs vary in stringency. Micron should disclose which OELs apply for each substance. It also would be ideal if the revision occurred even faster. In addition, there is no mention of Micron publicly reporting—at minimum—summary data on its exposure sampling results (and the OELs against which the exposures are being measured), worker health monitoring trends (with patient identities removed), or any corrective actions taken. These reports should be shared regularly with NYSDOH and made accessible to the public.

#### *Safety Committees and Fear of Retaliation*

The DEIS mentions that Micron will establish Worker Safety Committees (WSCs) to promote hazard identification and resolution (3-256). However, it provides no detail on how these committees will be structured to protect worker voices. Will employees have the right to raise concerns anonymously? Will participation be voluntary and protected from retaliation? Will committee proceedings be recorded or summarized for public or third-party review?

Too many communities have learned too late that internal EHS programs, however well-intentioned, can fail to catch or correct dangerous trends when there is inadequate

transparency or worker empowerment. Micron should clarify how it will ensure these WSCs are effective, inclusive, and insulated from fear-based suppression.

#### *Construction vs. Operations: Asymmetry in Standards*

Appendix L provides over 100 pages of detailed EHS requirements for construction contractors—including risk controls, compliance inspections, and method statements with job hazard analyses (Appendix L, pp. 10-115). However, there is no equivalent document or plan presented for operational workers who will face daily exposure to hazardous chemicals and process equipment over decades.

Many of the same standards should apply across both phases: critical risk checklists, PPE documentation, emergency response kits, pre-task planning. The DEIS mentions these elements for operations on pages 3-255 to 3-261, but does not provide access to the operational equivalent of the construction EHS performance standard. Will Micron publish these procedures? Will EHS metrics for operational staff be tracked and reported, as they are for contractors? Will there be a reward and recognition program for EHS participation by operational employees? These are basic elements of a mature safety culture—and their absence from the DEIS is concerning.

#### *Risk Management Plans and Community Access*

Micron's plan to develop a Risk Management Plan (RMP) for eight regulated chemicals is a positive step (p. 3-243). The company's pledge to share the RMP with local first responders and the public is particularly encouraging. However additional detail on how the public will access this information is missing. Will the RMP be published online? Will hard copies be available through local agencies? Will updates be automatically shared or only available by request?

Micron has stated that it uses an internal chemical approval process to identify potential hazards and apply controls, even in the absence of regulatory mandates (Appendix K, Vol 2, p. 395). The DEIS also refers to internal banned and restricted chemical lists as part of Micron's best management practices provided for hazard control measure examples (p. 3-258). Consistent with a precautionary approach, Micron should include in its RMP not only any regulated substances, but also any chemicals it deems hazardous through its own internal evaluations—whether listed as restricted or banned, or simply identified as potentially hazardous—regardless of their status under current federal or state regulations.

#### *ISO 45001*

Micron's ISO 45001 certification is cited repeatedly as proof of strong health and safety practices (ex: 3-256). While ISO 45001 is a widely respected framework, the certification standard is not publicly available—it must be purchased for \$222 USD (or 177 CHF). This cost barrier prevents

workers, community members, and many researchers from understanding what the certification truly entails or what commitments are being made.

CCU recommends that:

- Conduct and disclose job-specific risk assessments.
- Report illness rates in addition to injury data.
- Publish EHS protocols for operations equivalent to construction phase standards.
- Ensure worker safety committee participation is anonymous, voluntary, and protected from retaliation.
- Conduct illness rate reporting alongside injury data for operations.
- Ensure safe working conditions, fair compensation, and transparent promotion pathways.

These measures are essential to ensuring transparency, accountability, and worker protection throughout Micron's operations. Without enforceable commitments and publicly accessible information, critical health and safety risks may remain unrecognized and unaddressed.

## **B. Socioeconomic Impacts and Jobs**

Micron's proposed project is slated to receive upwards of \$20B in public subsidies and tax credits from federal, state, and local governments. With this momentous investment, the CNY community has been promised thousands of good jobs. However, Micron has made few concrete or enforceable commitments surrounding the permanent manufacturing jobs that define what constitutes a "good job" or how equitable access for these jobs will be ensured for current local residents, especially Syracusans.

This substantial public investment must result in real, quality jobs for members of the CNY community, especially those who have been historically left out of economic opportunity. A "good job" must guarantee family-sustaining wages and comprehensive benefits, safe working conditions, equitable hiring and employment practices, and access to an inclusive workforce pipeline and training opportunities. To meet this standard, Micron must provide specific details on its hiring process, compensation structures, working conditions, and training programs - and must make those commitments enforceable.

The DEIS underscores the importance with which socioeconomic impacts must be weighed under SEQRA, noting that " Under SEQRA, the protection and enhancement of the environment should be given appropriate weight with social and economic considerations, and the factors should be considered together in reaching decisions on proposed activities; environmental factors are not the sole consideration in decision-making (6 NYCRR § 617.1(d))." (p. 3-465)

### *Worker Pay*

The DEIS projects that by 2045, Micron’s Fab Complex will create over 9,000 permanent on-site operational jobs—90% in manufacturing and 10% in supportive services such as IT, security, and procurement—plus approximately 40,000 indirect jobs statewide (p. 0-1, 3-488). Within manufacturing, 10% will be leadership roles, 44% engineering/professional, and 36% equipment/process technicians; however, only 669 jobs in the first three years will be accessible without an advanced degree (p. Q-49-50).<sup>3</sup> While Micron advertises \$100,000 average total compensation (base salary plus cash bonuses)(p. 3-489), this figure includes bonuses of unclear frequency, and base salaries vary: engineers are projected to earn \$94,800 and technicians \$68,600, meaning nearly half of operational workers will fall short of the publicized average.<sup>4</sup> Micron also has one of the highest CEO-to-worker pay gaps among CHIPS Act recipients, with CEO compensation reaching \$30 million in 2024 while half of workers earned under \$54,570 in 2023.<sup>5</sup> To ensure equity and transparency, the EIS must require disclosure of full salary ranges for each position, clearly separating base pay from bonuses.

### *Hiring*

The DEIS highlights Micron’s inclusive construction hiring initiatives, including commitments to hire 1,500 veterans via the “Helmets to Hardhats” program (p. Q-53), participation in the CHIPS Women in Construction Framework (p. Q-49), setting targets for hiring from disadvantaged populations (p. Q-49), and a Project Labor Agreement with local trades (p. Q-49). However, it lacks enforceable commitments for recruiting marginalized workers into permanent manufacturing jobs, especially from high-poverty communities. While Micron aims to match or exceed the 60–70% local hire rates achieved at other facilities—equating to 6,300 permanent local jobs—it does not commit to this target (3-489). It also does not clarify how many hires would come from the City of Syracuse, which faces a 46% child poverty rate and significantly higher overall poverty than nearby areas like Clay and Cicero. Micron must guarantee that a meaningful percentage of new hires come from marginalized local communities, particularly within the City of Syracuse. Micron must establish a workforce development process that targets census tracts with the highest concentration of poverty in the CNY region.

### *Training*

The DEIS notes Micron’s partnerships with regional universities to expand equitable access to engineering careers, particularly for underrepresented and rural students, but lacks clarity on how these groups are defined, targeted, or supported (Q-53). While this is a positive step,

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<sup>3</sup> OCIDA. 2023. “Onondaga County Industrial Development Agency Application for Financial Assistance.” July 14, 2023. <https://ongovd.com/wp-content/uploads/2023/03/OCIDA-Micron-Amended-and-Restated-Financial-Assistance-Application-6-10-2024-Execute-d-4886-7419-5655.1.pdf>

<sup>4</sup> Ibid.

<sup>5</sup> AFL-CIO. 2025 “Highest-Paid CEOs.” <https://aflcio.org/paywatch/highest-paid-ceos>; Mills Rodrigo, Chris. 2024. “Leveraging the CHIPS Program to Create Good Jobs for All Semiconductor Workers.” Institute for Policy Studies. August 22, 2024. <https://ips-dc.org/report-leveraging-chips-program-to-create-good-jobs>.

Micron must also commit to equitable training access for production workers in lower-skill, entry-level, and mid-skill roles, particularly technicians, who will comprise 36% of the manufacturing workforce and require lower certification barriers (Q-50). The EIS should detail the structure, content, and delivery of the Micron Apprenticeship Program and on-the-job training, including how these programs differ, eligibility for each, whether certain workers will be prioritized for enrollment, and whether either program is offered in collaboration with community-based organizations, labor unions, or registered apprenticeship sponsors (state or federal). For the Micron Apprenticeship Program, the EIS should detail whether the program will intentionally target underrepresented or marginalized workers and if so how the targeting is implemented. It should also address the absence of plans for ongoing professional development to ensure equitable promotion, retention, and advancement opportunities, creating true long-term career pathways and inclusive economic mobility in a specialized sector.

#### *Work Conditions and Opportunities for Advancement*

The DEIS does not outline plans to ensure Micron workers will have access to internal advancement opportunities, despite reports from the Institute for Policy Studies that employees at Micron’s Manassas, Virginia facility have faced barriers such as premature removal of job postings, unpaid extra hours beyond twelve hour shifts to be considered for promotion, and minimal wage increases over several years. These concerns reflect broader challenges for U.S. semiconductor workers, where low wages, limited advancement, safety risks, and demanding schedules are common.<sup>6</sup> The DEIS states Micron will operate five shifts over 24-hour day, with 11.5-hour overlapping shifts, but provides no details on mitigating fatigue or related safety risks (p. 2-15). Long hours and mandatory overtime are linked to significantly higher injury rates—one U.S. study found overtime increased injury risk by 61%, with at least 12 hours of work a day raising it by 37% and at least 60 hours per week by 23%.<sup>7</sup> These demanding work schedules, combined with a lack of clarity around advancement and training, raise serious concerns about job quality and long-term retention. The EIS should directly address these issues by outlining how Micron plans to provide safe working conditions, fair compensation, and transparent, equitable pathways for internal promotion and professional development.

#### *Workforce Reporting Information Collection*

To ensure Micron meets the goals of the CHIPS Incentives Program and Green CHIPS Act, the CHIPS Program Office (CPO) and Empire State Development (ESD) must actively monitor workforce metrics, milestones, and compliance with health and safety standards. Collecting baseline data is essential to determine if these programs deliver good, accessible manufacturing jobs. At minimum, Micron should report:

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<sup>6</sup> Mills Rodrigo, Chris. 2024. “Leveraging the CHIPS Program to Create Good Jobs for All Semiconductor Workers.”

<sup>7</sup> A. E. Dembe, J. B. Erickson, R. G. Delbos, and S. M. Banks, “The Impact of Overtime and Long Work Hours on Occupational Injuries and Illnesses: New Evidence from the United States,” *Occupational & Environmental Medicine* 62, no. 9 (September 2005): 588–97, <https://pubmed.ncbi.nlm.nih.gov/16109814/>.

1. The number and geographic location of U.S. jobs created or supported.
2. Minimum wages and benefits for each job title (to expose pay disparities obscured by averages.)
3. Recruitment, hiring, and training plans for marginalized workers, including women, people of color, veterans, formerly incarcerated individuals, rural residents, residents of low-income census tracts, and workers transitioning from carbon-intensive industries.

Quarterly reports should be mandated and required to detail U.S. Full Time Equivalent (FTE) work performed that quarter by job type and demographics; minimum pay and benefits disaggregated by title and demographics; new hire information; and descriptions of workforce development, apprenticeship, and training initiatives. Micron should also be required to submit all federally or state-mandated administrative and national policy compliance documentation—such as firm level EEO-1 Component reports and OSHA 300 logs—and disclose violations and their overall compliance status.

CPO, NIST, and ESD must enforce compliance by applying penalties or rescinding benefits if workforce-related commitments are not met. Similar to the CHIPS Incentives Program NOFO's clawback provisions for missed construction targets, technology-sharing violations, or prohibited foreign expansion<sup>8</sup>, the Green CHIPS Program should impose penalties for failing to meet its job creation targets, reporting requirements, or equitable hiring commitments.<sup>9</sup> The federal and state CHIPS Acts present the opportunity to ensure that the hundreds of thousands of jobs created are high-quality, equitable positions, and robust reporting with strong enforcement mechanisms is essential to achieving that goal.

#### *Economic Development & Growth Inducing Effects*

Economic inequality and segregation are deeply entrenched in Central New York, especially in Syracuse, where Black and Latinx residents face significantly higher poverty rates than white residents, and disparities between the city and surrounding areas like Clay are stark. In Syracuse, 29% the population is Black, compared to just 4.5% in Clay. Despite these realities, Micron has made no clear, enforceable commitments to reducing poverty in Onondaga County. The DEIS downplays potential labor and economic impacts, asserting without documentation that Micron's hiring will not significantly affect labor costs or workforce availability for other businesses. It also claims construction-phase labor shortages—expected to last 16 years—will be “limited and short-term” (p. 3-485) without explaining the basis for that conclusion. Absent detailed evidence on labor acquisition, training, in-migration, and impacts on other employers, the public cannot meaningfully evaluate these claims. The DEIS also fails to address how an influx of low-wage spinoff jobs—especially in retail and service sectors that dominate the regional economy—may worsen poverty and inequality. Without wage distribution data, it is impossible to assess whether new jobs will lift incomes or deepen economic divides, particularly

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<sup>8</sup> National Institute of Standards and Technology (NIST). 2023 “Notice of Funding Opportunity: Commercial Fabrication Facilities.

<sup>9</sup> Excelsior Jobs Program Regulations (updated for Green CHIPS 3/28/23). March 28, 2023. <https://esd.ny.gov/sites/default/files/ExcelsiorRegs%20-2023-GC-updated-final-050123.pdf>.

given Syracuse’s 30.1% poverty rate and highest-in-the-nation child poverty rate of 46%. Lessons from other high-tech hubs show that growth in high-wage jobs can increase regional employment growth overall but also raise housing costs and erode real wages for lower earners—risks that the DEIS does not adequately address.

The DEIS similarly minimizes likely adverse impacts on housing, affordability, infrastructure, and greenhouse gas (GHG) emissions, relying on vague assurances and aspirational planning principles rather than binding commitments. It acknowledges the region has outdated municipal plans and is unprepared to manage induced growth, yet offers no enforceable mitigation measures. Leaving induced growth, its impacts, and mitigation to “future planning policies” is unacceptable and untenable. Approvals for the fab development must be contingent on robust, binding mitigation commitments with measurable objectives to address concerns including GHG emissions, infrastructure strain, traffic congestion, housing affordability, and homelessness. A binding CBA that details a mitigation plan with measurable and achievable objectives will go far in helping to offset the adverse impacts of the induced growth. The EIS must also account for GHG emissions from induced residential and commercial (or even supply chain growth) rather than dismissing them as minor compared to fab operations. Without robust, enforceable mitigation strategies, the project risks exacerbating inequality, displacing low-income residents, and imposing long-term socioeconomic and environmental costs on the community.

### *Community Investments*

As part of the Green CHIPS investment, Micron has pledged at least \$250 million over 20 years—half of the \$500 million Community Investment Fund—toward workforce development and expansion, education, community assets and organizations, and affordable housing, as outlined in the CIF Memorandum of Understanding (MOU).<sup>10</sup> While these commitments are promising, they are made in “good faith” and are not enforceable, and the DEIS fails to provide measurable community outcomes or accountability mechanisms. The “Green CHIPS Community Plan” which is intended to formalize these commitments (referenced in the MOU), is not publicly available despite FOIL requests, leaving unclear what goals Micron will be held to, how they will be met, and what will be publicly reported. Notably, the DEIS makes no references to the “Green CHIPS Community Plan” despite several references to the Green CHIPS Investment Fund. To ensure tangible benefits, we encourage Micron to make these commitments enforceable through clear milestones, public reporting on outcomes, and structured community oversight. These measures for accountability can be provided and enforced through CBAs between impacted communities and CHIPS grantees. Like job creation commitments, community investment commitments whether included in a CBA or not, should be subject to monitoring and public reporting. Because they directly involve impacted communities in their negotiation and enforcement, we believe robust CBAs are the best way for companies to comply with 15 U.S. Code § 4652, which requires recipients of CHIPS and Science Act funding to invest in surrounding host communities. Such a CBA should establish a community monitoring committee with worker

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<sup>10</sup> ESD. 2022. “Memorandum of Understanding for Micron Community Investment Framework in Central New York.”

and resident representatives, require regular public reporting (by Micron or a community-managed third-party expert), and make all information accessible online. Central New York's history of unfulfilled corporate promises, such as Destiny USA, underscores the urgency of enforceable commitments. With one of the highest poverty rates in the nation, Syracuse cannot afford another broken investment, and Micron—supported by local, state, and federal leaders—must guarantee that this monumental public investment delivers lasting, equitable economic benefits.

CCU recommends that:

- Define and enforce “good job” standards, including wages, benefits, safety, equity, and training access.
- Disclose salary ranges by job title and make local hire targets enforceable.
- Guarantee a meaningful share of hires from marginalized communities and remove unnecessary hiring barriers.
- Partner with unions and community organizations for workforce development.
- Make training and apprenticeship commitments enforceable, with clear eligibility, partnerships, and targeting of marginalized workers.
- Commit to ongoing professional development and clear internal advancement pathways.
- Mitigate fatigue and safety risks from long shifts through rest periods, shift rotations, and fatigue management protocols.
- Conduct comprehensive impact analyses on housing, labor shortages, earnings distribution, and low-wage spinoff job impacts.
- Implement targeted housing mitigation measures with a regional housing mitigation fund and dedicated staffing.
- Establish a community oversight board, citizens' conservation/mitigation council, and independent professional planning team.
- Detail labor acquisition strategies, workforce training plans, in-migration impacts, and effects on existing employers.
- Address inequality and displacement risks for marginalized and low-income communities.
- Assess and report GHG emissions from induced residential, commercial, and supply chain growth.
- Make project approvals contingent on a binding CBA with measurable mitigation objectives.

The DEIS also lacks detail on career advancement pathways, fatigue management for 11.5-hour shifts, and health risks tied to mandatory overtime. These omissions conflict with Micron's claims of creating "good jobs" and should be addressed through enforceable labor standards.

## 6. Climate and Renewable Energy Claims

The Micron facility will vastly increase the emission of GHGs, through direct emission (Scope 1) and electricity use (Scope 2), but the DEIS fails to identify adequate plans for limiting the burning of fossil fuels.

The company proposes to burn 9.7 billion cubic feet of natural gas annually primarily to incinerate process gases containing perfluorocarbons (PFCs). PFCs are powerful greenhouse gases, and their emissions threaten to move New York far away from the Climate Leadership and Community Protection Act goals of 70% energy from renewable sources by 2030 and 100% zero-emission energy by 2040. Once complete, the facility will use 15,674 GWh of electricity annually, equivalent to all of the power used by customers in 2023 in CNY (Load Zone C) (p. 3-269).

Micron claims it will mitigate 2.4 million metric tons of Scope 2 GHG emissions through the purchase of renewable energy credits, but offers no detail on the sourcing, quality, or impact of these purchases. The DEIS does not specify whether Micron will use power purchase agreements (PPAs) or rely solely on unbundled renewable energy certificates (RECs), which are widely recognized as low-impact and ineffective in driving new renewable energy development.

Micron's plan includes a 4 MW solar installation—mitigating only 0.02% of its projected Scope 2 emissions. The rest of its mitigation claim depends entirely on offset accounting methods that do not reflect actual fossil fuel displacement. Semiconductor fabs operate 24/7 and require steady baseload power, meaning they frequently draw on fossil sources during periods of low renewable production.

The DEIS also fails to address the broader impact Micron's electricity demand will have on the New York grid. According to the NYISO, Micron's facility is the single largest load increase in the state's 2042 forecast, and will require fossil generation to remain online longer than otherwise planned.

CCU recommends:

- Micron commit to sourcing 24/7 carbon-free electricity through PPAs with new renewable sources, combined with battery storage;
- Eliminate reliance on unbundled RECs in Scope 2 mitigation accounting;
- Include a demand flexibility strategy to reduce fossil use during peak hours;
- Disclose GHG emissions from induced grid buildout and embedded emissions from materials, construction, and induced development.

Absent these commitments, Micron's GHG mitigation plan will fall short of state climate goals and contribute to long-term fossil fuel reliance.

## 7. Monitoring, Reporting, and Public Accountability

The DEIS includes numerous plans and programs Micron "intends" to develop—but fails to ensure that these will be made public, monitored, or enforceable. Examples include:

- Occupational health and safety protocols;
- Emergency preparedness documents;
- Wastewater monitoring and chemical inventories;
- Workforce development and hiring commitments;
- Green CHIPS Community Investment Fund outcomes.

As the DEIS notes (p. 3-465), SEQRA requires balancing environmental, social, and economic factors in project decisions. But without mechanisms for tracking outcomes, the public has no way to evaluate whether Micron meets its obligations or to intervene when problems arise.

CCU recommends that the Final EIS:

- Require Micron to report quarterly on environmental, workforce, and public health metrics, including:
  - Hazardous waste quantities and destinations;
  - Air and water monitoring data;
  - Workforce demographics, wages, and local hiring rates;
  - Health and safety incidents and corrective actions.
- Require public release of the following documents:
  - Emergency response protocols;
  - Chemical inventories and exposure control plans;
  - PFAS, including fluoropolymer, use and emissions reports;
  - Community Investment Fund goals, grantees, and outcomes.
- Establish a third-party public oversight committee with representation from community, labor, and environmental organizations to monitor compliance, receive complaints, and review reports.

## 8. Conclusion and Summary of Recommendations

Micron's DEIS outlines an ambitious project—but lacks the enforceable commitments and transparent systems needed to protect workers, communities, and the climate. CCU supports investment in U.S. semiconductor manufacturing, but not at the cost of environmental degradation, community displacement, or weak labor standards.

We recommend the following actions: (see next page)

### **Scope and Alternatives**

- Fully assess a Reduced Scale Alternative that considers a two-fab buildout to reduce environmental harms, consistent with SEQRA requirements.
- Unless the Reduced Scale Alternative is adopted, the DEIS should include a clear and enforceable mechanism to re-evaluate project impacts before approving construction of the third and fourth fabs—such as a commitment to conduct a Supplemental Environmental Impact Statement based on new information and technological developments.

### **Hazardous Substances and Wastewater**

- Publish a full chemical inventory, including identities, quantities, and use/storage plans.
- Apply transparency to internal chemical review processes and disclose restricted substances and reduction strategies.
- Disclose specific air pollutants and destruction/removal efficiency (DRE) values for thermal oxidizers.
- Consider safer alternatives to incineration, such as capturing gases, condensing them and treating them with supercritical water oxidation (SCWO).

### **Hazardous Waste Generation and Disposal**

- Identify chemicals by type and volume for all waste categories.
- Prohibit incineration of fluorinated compounds and characterize byproducts if incineration occurs.
- Disclose disposal vendors and ensure accountability for downstream impacts.

### **Wastewater Sludge and Industrial Pretreatment**

- Provide sludge volume projections and testing protocols.
- Prohibit reuse or land application of sludge without contaminant screening.
- Disclose contaminants expected in sludge and regulatory oversight plans.

### **Emergency Preparedness**

- Publish the full Risk Management Plan (RMP), including all hazardous substances regardless of threshold.
- Provide public access to emergency response protocols and conduct offsite consequence modeling.
- Support hazmat responder staffing, training, and annual exercises.
- Model flood risk and integrate climate-adaptive stormwater and green infrastructure strategies.

### **Occupational Health and Worker Safety**

- Conduct and disclose job-specific risk assessments.
- Report illness rates in addition to injury data.
- Disclose occupational exposure limits (OELs) for each hazardous substance and publicly report exposure monitoring results, trends, and corrective actions.
- Publish EHS protocols for operations equivalent to construction phase standards.
- Ensure worker safety committee participation is anonymous, voluntary, and protected from retaliation.

- Conduct illness rate reporting alongside injury data for operations.
- Ensure safe working conditions, fair compensation, and transparent promotion pathways.

### **Socioeconomic Impacts and Jobs**

- Define and enforce “good job” standards, including wages, benefits, safety, equity, and training access.
- Disclose salary ranges by job title and make local hire targets enforceable.
- Guarantee a meaningful share of hires from marginalized communities and remove unnecessary hiring barriers.
- Partner with unions and community organizations for workforce development.
- Make training and apprenticeship commitments enforceable, with clear eligibility, partnerships, and targeting of marginalized workers.
- Commit to ongoing professional development and clear internal advancement pathways.
- Mitigate fatigue and safety risks from long shifts through rest periods, shift rotations, and fatigue management protocols.

### **Growth-Inducing Impacts and Housing**

- Conduct comprehensive impact analyses on housing, labor shortages, earnings distribution, and low-wage spinoff job impacts.
- Implement targeted housing mitigation measures with a regional housing mitigation fund and dedicated staffing.
- Establish a community oversight board, citizens’ conservation/mitigation council, and independent professional planning team.
- Detail labor acquisition strategies, workforce training plans, in-migration impacts, and effects on existing employers.
- Address inequality and displacement risks for marginalized and low-income communities.
- Assess and report GHG emissions from induced residential, commercial, and supply chain growth.
- Make project approvals contingent on a binding CBA with measurable mitigation objectives.

### **Climate and Renewable Energy Claims**

- Eliminate reliance on unbundled RECs for GHG mitigation.
- Source 24/7 carbon-free electricity via power purchase agreements with new renewable energy projects.
- Disclose emissions from grid expansion and facility construction.
- Commit to demand flexibility strategies to reduce fossil fuel dependence during peak hours.

### **Monitoring, Reporting, and Public Accountability**

- Require quarterly public reporting on environmental, workforce, and health metrics.
- Release key documents: RMP, chemical inventories, PFAS emissions reports, emergency plans, and investment outcomes.
- Establish a third-party oversight committee with representatives from labor, environmental, and community organizations.

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**From:** Ashley Riehlman <Ashley@cortlandbusiness.com>  
**Sent:** Monday, August 11, 2025 3:19 PM  
**To:** CHIPSNEPA@chips.gov  
**Cc:** Melanie Vilardi; Andrea Skeels  
**Subject:** [EXTERNAL] MICRON Support  
**Attachments:** MICRON Support Letter.pdf

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Good afternoon,

Please find the Cortland County IDA 's letter in support of the MICRON project attached.

Thank you,

**Ashley B Riehlman**

Cortland County BDC/IDA  
Community Relations Specialist  
40 Main St, Suite A, Cortland, NY 13045  
www.cortlandbusiness.com  
607.756.5005





August 11, 2025

To Whom It May Concern:

The Cortland County Industrial Development Agency is pleased to offer its strong support for the MICRON project. This transformative investment represents a historic opportunity for our region and state, and we are proud to stand behind an initiative that will drive economic growth, create quality jobs, and strengthen the advanced manufacturing ecosystem throughout Central and Upstate New York.

The MICRON project is poised to generate tens of thousands of direct and indirect jobs, including a significant number of high-paying positions in semiconductor manufacturing. The ripple effects of this investment will reach far beyond the Onondaga county, offering surrounding communities like Cortland the opportunity to contribute to, and benefit from, the project's long-term success.

As the regional economy prepares to meet the needs of such a large-scale project, the Cortland County IDA is actively engaged in supporting workforce development with two higher education institutions and a growing network of vocational training programs, Cortland County is well-positioned to supply talent in construction, electrical work, HVAC, precision machining, and other trades critical to the project's development phases.

In addition, the MICRON project is expected to create a wide range of indirect job opportunities, most notably in construction, logistics, materials supply, and engineering services. Cortland County businesses and contractors stand ready to support this growth, and the IDA is committed to facilitating connections between local businesses and the MICRON supply chain.

We recognize the MICRON project as a once-in-a-generation economic catalyst for Upstate New York. The Cortland County IDA is enthusiastic about the possibilities it presents for regional collaboration, sustainable development, and inclusive workforce growth. We look forward to being a partner in its success.

Sincerely,

*Melanie Vilardi*

Melanie Vilardi  
Executive Director  
Cortland County Industrial Development Agency  
40 Main St Cortland, NY 13045

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**From:** Paul Crovella <plcrovella@esf.edu>  
**Sent:** Monday, August 11, 2025 11:19 PM  
**To:** CHIPSNEPA@chips.gov  
**Subject:** [EXTERNAL] Comments for review of Micron DEIS  
**Attachments:** Embodied carbon emissions from construction materials for Micron DEIS review - Paul Crovella.pdf

Greetings,

Please find attached the comments for your review and consideration.

Respectfully,

Paul Crovella  
Associate Professor of Construction Management  
State University of New York College of Environmental Science and Forestry  
219 Baker Laboratory  
1 Forestry Drive  
Syracuse, NY 13210  
[plcrovella@esf.edu](mailto:plcrovella@esf.edu)  
(315) 470-6839  
[Website](#)  
[LinkedIn](#)  
[SUNY-ESF Construction Management Instagram](#)

To: OCIDA / CHIPSNEPA

ATTN: Micron Project; Draft Environmental Impact Statement for Micron Semiconductor Manufacturing Project, Clay, NY

RE: Draft Environmental Assessment EISX-006-55-CPO-001

From: Paul Crovella, PE, PhD

Date: August 11, 2025

Comments herein refer to GHG emissions from production of construction materials for four Micron fabs in Clay, NY

Dear Members of the CPO and OCIDA,

Thank you for your review and consideration of these comments on the Micron Project located in Clay, NY. Since the moment that this project was announced, there has been a palpable sense of excitement in the community. I, too, share excitement over the potential for how this project can provide in leadership, both technological and environmental, for Central New York, New York State, and the United States.

Some of the earliest activities on site, activities planned to last for decades, will be those of the construction operations. The scale of these activities is unlike any single project that this community has seen in the past two centuries. In carrying out these activities, I believe there lies an untapped opportunity for this project to be an exemplar of how significant environmental impacts from these construction activities can be mitigated. I believe that the DEIS must not be accepted until the appropriate steps are taken to reduce these significant impacts for the Community, the State, and the Nation.

In Section 3.7.3.2 of the DEIS, the document states “GHG emissions associated with construction upstream inputs and resulting lifecycle emissions for the entire value chain are not reasonably foreseeable at this time due to variability and uncertainty. As a result, these estimates have not been developed as they would not provide reliable information for decision-making.”<sup>1</sup> However, from the industry reports and statements by Micron officials themselves, these GHG emissions are reasonably foreseeable, can be accurately predicted, and action can be taken to significantly reduce their impacts.

Based on values in a presentation, **Creating Sustainable Wafer Fabs for the Future**, delivered by Herbert Blaschitz at the November 2019 International Trade Partners Conference<sup>2</sup>, the amount of concrete required to build the four semiconductor wafer fabs will exceed 2,500,000 cubic yards. Based on the current industry average for concrete production in the Great Lakes

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<sup>1</sup> <https://cdxapps.epa.gov/cdx-enepa-ii/public/action/eis/details?eisId=520451>

<sup>2</sup> Creating Sustainable Wafer Fabs for the Future – International Trade Partners Conference presentation in 2019 by Herbert Blaschitz (available upon request)

Region from the Carbon Leadership Forum<sup>3</sup>, the GHG emissions from this concrete production will exceed 600,000 metric tons over the construction lifetime of the project. These impacts are significant, and a plan to mitigate these impacts must be implemented.

Fortunately, these emissions can be reduced significantly. Approximately 88-90% of the GHG emissions from concrete production come from the use of Portland Cement in the mixture. The production of Portland Cement is a GHG emissions-intense operation. However, there are methods of production of Portland Cement and other products that can be substituted for Portland Cement, both of which can significantly reduce the GHG impacts from concrete production with no impact on structural performance. Cement production from companies like Brimstone<sup>4</sup> and supplementary cementitious materials such as fly ash from coal combustion, ground granulated blast furnace slag from steel production, and glass pozzolans from glass returned for recycling can all be used in concrete to replace traditional Portland Cement. The use of such techniques can reduce the carbon impact from cement by 40%<sup>5</sup> or more.

The use of steel in the construction of the fabs provides a similar opportunity to mitigate a significant environmental impact using currently available industrial technologies. Both the primary and secondary productions have a range of carbon intensities in the current industry offerings. Requiring Micron to engage with the Sustainable Steel Buyers Platform<sup>6</sup>, and to reduce the GHG emissions from primary and secondary steel production by 25% based on the industry's Responsible Steel Performance Levels will ensure that these significant impacts are responsibly mitigated.

Given that the production of concrete and steel are responsible for approximately 15% of the anthropogenic GHG emissions since the industrial revolution, and given that reports from June 2024 statements by a Micron executive tallied the concrete needs as six times greater than used to build the Pentagon, and the steel needs as four times greater than those of the Golden Gate Bridge<sup>7</sup>, ***the DEIS should not be accepted until the document includes an analysis of the GHG emissions from construction activities, and concrete and steel procurement are revised to include a commitment to reduce the concrete GHG levels to 50% below the Northeast concrete batch plant average values for 2024 as reported by the National Ready Mix Concrete Association and steel procurement for primary and secondary processes are both 25% below the industry values reported in the Responsible Steel Performance Levels.***

Thank you for your attention and dedication to this DEIS review.

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<sup>3</sup> <https://carbonleadershipforum.org/2025-clf-north-american-material-baselines/>

<sup>4</sup> <https://www.brimstone.com/>

<sup>5</sup> <https://www.sciencedirect.com/science/article/pii/S0921344917303592>

<sup>66</sup> <https://rmi.org/our-work/climate-aligned-industries/sustainable-steel-buyers-platform/>

<sup>7</sup> Glenn Coin, "Micron's Concrete Dilemma: Building the Vast Complex in Clay Conflicts with Green Promises," Syracuse.com, June 13, 2024, <https://www.syracuse.com/business/2024/06/microns-concrete-dilemma-building-the-vast-complex-in-clay-conflicts-with-green-promises.html>

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**From:** Paul Doody <pauldoody1978@gmail.com>  
**Sent:** Monday, August 11, 2025 12:50 PM  
**To:** CHIPSNEPA@chips.gov  
**Subject:** [EXTERNAL] Micron DEIS Comments  
**Attachments:** Paul\_Doody\_Micron\_EIS\_Comments-Aug-11-2025.pdf

**This message needs your attention**

- This is a personal email address.
- This is their first email to your company.

I appreciate the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the proposed Micron facility in Clay, NY. Attached are my comments, I would appreciate a reply indicating you received my comments. Thank you!

Paul Doody  
pauldoody1978@gmail.com  
315-409-5643

**John Paul Doody's Comments on  
MICRON SEMICONDUCTOR MANUFACTURING PROJECT, CLAY, NY, DRAFT  
ENVIRONMENTAL IMPACT STATEMENT (JUNE 2025)**

This document provides comments on the Draft Environmental Impact Statement (DEIS) by John Paul Doody, P.E., residing at 3308 Misty Cove Circle, Baldwinsville, NY (email [pauldoody1978@gmail.com](mailto:pauldoody1978@gmail.com)). It should be noted that if there are any discrepancies between comments I provided on July 24, 2025 at the morning session of the public meeting and the comments herein, the comments herein shall supersede prior comments. I have organized my comments as General Comments up front followed by Specific Comments (listed by page number).

**General Comments**

1. While there are approximately 20,000 pages in the DEIS there is inadequate detail with which to truly assess the potential for significant adverse environmental effects. Most sections provide reasonable descriptions of the methodology employed but lack sufficient detail to do an independent assessment, or be able to understand the detailed basis of the report's conclusions. As an example, I could not find anywhere in the EIS a listing of all the chemicals and quantities planned to be used at the facility. As such, I cannot independently assess whether conclusions about wastewater and air discharges as well as waste management and Health and Safety (H&S) are reasonable. Also, the public deserves to know what chemicals will be transported along our roadways, increasing risks to the community. The list of all chemicals currently contemplated to be used at the facility, along with the quantities of each chemical to be delivered, stored, consumed and disposed should be included in the Final EIS. Specific comments point out areas where additional details are warranted.
2. There is only a very superficial discussion about spills, chemical releases, system upsets and equipment malfunctions that can result in contamination of building materials, soil, groundwater, surface water and the atmosphere. The report only provides very brief simplistic statements that there will be secondary containment, SPCC plans, spills will be quickly cleaned up and spill kits will be available. One area of particular concern I have is related to a release that could enter the Oneida River eventually discharging to Lake Ontario. The Oswego River mouth is not too far from OCWA's water intake potentially resulting in contamination of our multi-county water supply. More discussion and recognition of this potential risk is critical, therefore I am recommending a thorough vulnerability assessment/risk

management approach to more fully assess the risk of spills, their consequence and appropriate mitigation measures, such as additional potable water treatment or expansion of the Otisco Lake and Skaneateles Lake capacity as backup, for example. This should be supported by fate and transport modeling to inform the vulnerability assessment. I recommend that the public actively participate in such an assessment as we will be accepting a lot of the risks. I would point out that the DEIS does include some more detailed discussion of spills in Section 4 (under Groundwater), where it describes potential cumulative effects on groundwater, covering a list of known development projects not necessarily related to Micron. The text in Section 4 states *“It can be assumed that planned residential, industrial, and transportation development, along with the implementation of the Proposed Action and Connected Actions could reasonably result in the increased storage, handling, and use of potential groundwater contaminants, ultimately leading to the increased risk of groundwater exposure to pollutants from spills or leaks, or from contaminated stormwater runoff. Based on the characteristics of relevant aquifers, increases in groundwater contamination due to urbanization could lead to local and regional cumulative impacts, as surficial aquifers are highly permeable and could become contaminated from overlying spills, leaks, or infiltration, and carbonate aquifers can transport groundwater long distances through solution openings, potentially transporting contamination on a regional scale. Ultimately, depending on the severity of potential groundwater exposure to contaminants, impacts could be significant and widespread. However, preventative measures taken by those entities storing or handling potential groundwater contaminants would reduce risks of exposure to groundwater. These may include standardized chemical storage and handling practices, the use of spill prevention and countermeasure plans and practices, and the use of BMPs that can trap or prevent the infiltration of contaminated stormwater.”* This type of discussion needs to be included in Section 3 (and additional Section 4 subsections) under Surface Water, Groundwater, Air, Solid/Hazardous Waste, and Health and Safety sections. The public deserves to know the true risks of contamination associated with Micron’s operations.

3. I would like to emphasize and support the geologic analysis completed by Jon Fox, P.G. on behalf of and submitted as comments on the DEIS by Sterling Water Stewards. The Executive Summary of the report is: *“Based on currently available geologic data and information, initiation of construction activities such as the excavation and removal of soil or bedrock at the Site is not recommended at this time based on the documented occurrence of soluble bedrock with evidence of dissolution and highly variable subsurface conditions at the Site that could lead to fast, turbulent subsurface water flow and further dissolution of soluble bedrock. These surface and subsurface conditions are consistent with karst geology/features and can pose significant risks to human health, built structures, water quality, and the environment through the formation of*

*unwanted and damaging land subsidence, flooding, slope movements, and/or contaminant migration. The Draft Environmental Impact Statement (EIS) fails to acknowledge the presence of karst-like conditions at the Site and is therefore insufficient to assess the impacts of highly variable subsurface conditions on site preparation and development. Focused areas of groundwater recharge need to be identified to help prevent contamination from sources on or adjacent to karst features and to avoid or minimize natural and human-induced geologic hazards and impacts in areas of soluble bedrock such as land subsidence, flooding, and slope movement. The review uncovered significant data and information gaps regarding the Site's geology, soils, topography, and water resources, including but not limited to recent nearby use of a productive bedrock aquifer for local water supply. Additional investigation and characterization of the Site's geology, hydrology, and local groundwater use are required to inform the public and to assist owners, operators, design professionals, plan reviewers, public works officials, and jurisdictional regulators in making informed decisions on Site development and management. Recommendations are provided in response to existing data and information gaps and to address the key findings and conclusions contained in this report.” It is critical that the issue of geologic conditions be reconciled given the additional risks associated with karst conditions.*

4. I would recommend that a community oversight council be developed that has equal authority and a seat at the table with other oversight agencies to review the project on an ongoing basis. It is likely that many things will change over the nearly 20-year period of construction and 15 years of operation, such as semiconductor manufacturing processes, environmental technological advancements and lessons learned. We are inevitably going to learn more and technologies will be developed warranting ongoing review and adjustments. As such, an adaptive management program with active public involvement should be implemented.
5. It appears the traffic analysis did not consider the traffic delays during construction of the proposed traffic improvements. The summary charts show traffic impacts in 2027 and 2031, and the text states that the planned traffic improvements will begin after 2027 and be completed by 2031. Therefore, the conclusions about delays to traffic ignore the inevitable traffic headaches during the construction of those improvements. I think we all realize there will be major traffic headaches with all of this construction and it is important that the report assess the combined effects of Micron's construction and operations along with the traffic improvement construction. The Final EIS must recognize this important aspect to traffic inconveniences and reflect the combined effects of facility construction, facility operations and construction of traffic improvements.
6. There is reasonable recognition of the state of knowledge on PFAS, referred to as “forever chemicals”, however no detail is provided in the DEIS regarding how much

PFAS and what specific formulations will be delivered, stored, used and discharged. I commend Micron for committing to install treatment on their wastewater to remove PFAS but it is not possible to assess the viability of treatment effectiveness absent details on PFAS quantities and concentrations in waste streams. I also didn't see any discussion about PFAS air emissions nor any treatment of PFAS air discharges. Additional details regarding PFAS, as noted in this comment, must be included in the Final EIS.

7. I'm also concerned with the impact this project will have on housing affordability. While many homeowners expect to see home values rise, the increase in housing and rental prices will make housing even more unaffordable than it is today for many people in the region. The report refers to a NYS initiative but I question whether that will be enough. This is an issue someone other than Micron needs to take ownership of, and not just kick it to the state of NY.
8. The Final EIS should address the massive construction and availability of resources. More specifically the Final EIS should evaluate whether there are there an adequate number of qualified contractors and rail-accessible aggregate availability to be able to handle all this construction under the schedules presented.

### **Specific Comments**

1. Page 0-5, Section 0.3: In the subsection addressing elimination of Rt. 11 Access, I agree that having multiple access points is good for mitigating traffic impacts to the community. In addition, it would provide additional means for egress in emergencies and additional access for emergency vehicles. I believe the employees will like the increased convenience as well.
2. Page 0-8, Section 0.4: In the subsection on Biological Resources describe any relocation efforts planned for plants and animal species, especially threatened and endangered species, to minimize losses.
3. Page 0-8, Section 0.4: Subsection on Historic and Cultural Resources, please describe what the public review process is for the ongoing study. In addition, please add any new findings from those studies in the Final EIS. Also, describe the most current schedule for completion of these studies as they could affect the start of construction. See additional detail in the Specific Comment for Section 3.5.3
4. Page 0-9, Section 0.4: Subsection on Air Quality, I would expect there will be significant dust issues during construction and to gloss over this is irresponsible. The public deserves a transparent assessment about dust during construction, even when Micron does everything it can to mitigate. Also, during operation there will be significantly more toxic releases than exist today, not including releases during

upset conditions. Additional specific comments are provided regarding air quality under Section 3.

5. Page 0-9, Section 0.4: GHG Emissions, Climate Change and Climate Resiliency, the statement that the facility construction and operation will have a significant impact on climate change seems to be quite important. If this single facility can have that much impact on global climate change then it must be seriously considered whether it should be built and operated anywhere. The wording in this section should be carefully reviewed to be consistent with the GHG discussion in Section 3.
6. Page 0-10, Section 0.4: Solid Waste, Hazardous Waste and Hazardous Materials, this subsection needs to indicate the risks associated with spills, and other inadvertent releases. As noted in specific comments for Section 3, the issue of spills and other inadvertent releases also needs to be included in sections describing surface water, groundwater, soils, and air emissions.
7. Page 0-10, Section 0.4: Human Health and Safety, when discussing the possibility of accidents please clarify if this includes traffic accidents during construction of the facility. Also, I'm glad the EIS recognizes the importance of communicating, training and coordinating with first responders, however I recommend that similar education be provided for all regional hospitals and Urgent Care facilities so they are aware of any unique health care needs due to exposure to the myriad chemicals transported, transferred, stored, used and discharged/disposed.
8. Page 0-11, Section 0.4: Utilities and Infrastructure, in the top paragraph please better describe why the significant effects of the Micron facility on the electricity demand are not adverse. Simply suggesting the planning process will alleviate problems seems unreasonable and seems to be kicking the can to another entity. In the first full paragraph, if there is a reduction in gas supply for some reason (e.g., upset conditions or other shortage) to the area describe the implications on gas service such as who gets preference for the supply, Micron or the public? It seems like under such a situation there could be a significant adverse effect that should be recognized. It would be nice to know if Micron plans to have their own water tank/tower for fire demand and equalization of usage to minimize impacts to other water users.
9. Page 0-12, Section 0.4: Transportation and Traffic, this section should note where in the document wetland impacts associated with traffic improvements are assessed. I'm thinking about the proposed new 481 interchange at the CSX crossing as I don't see how wetland impacts can be avoided and should be added to the overall project impacts.

10. Page 0-13, Section 0.4: Visual Effects and Community Character, depending on hours of operation for construction the noise effects could be significant for local residents, particularly backup alarms on construction vehicles, as they don't typically show up as unacceptable when modelling noise. The project should consider use of "quacker" alarms or strobes for after hours construction. Also, in the last paragraph of this subsection the EIS needs to include its conclusion about whether there are significant adverse effects.
11. Page 0-14, Section 0.4: Community Facilities, Open Space and Recreation, in the second to last paragraph, please clarify if the local Fire/EMT will need to be expanded to adequately service this facility and whether Micron will have its own emergency service staffing on site. Also, in the final paragraph of this subsection indicate whether the snowmobile trail will be relocated as part of this project, to avoid closure of an important community resource.
12. Page 0-15, Section 0.4: Environmental Justice, it is not clear why the adverse effect on home and rent prices would be temporary. I see the pricing increase to be permanent, so it will make housing in the region less affordable permanently, the text needs to clarify this point, or refer the reader to the more detailed section of the report to support the conclusion that the effect is temporary.
13. Page 0-17, Section 0.6: The Final EIS needs to add construction dust, and spills during construction and operation as well. There will be mitigation and protective measures employed but these adverse effects should still be expected.
14. Page 2-7, Section 2.1.1.1: In the paragraph below Table 2.1-2 consider qualifying the 4Q 2025 date for construction start, as I don't see any way Micron will even start foundation work let alone a shell this year.
15. Page 2-9, Footnote 14: It is a big assumption that the Town's construction time restriction will be approved, it is a very important item for anyone in proximity to the site as they will have to deal with 16 years of noise, dust, traffic headaches, etc. for many years. The public needs to be made aware of this change, and specifically the intended hours of operation. This is yet another big reason we need more public engagement, this DEIS cannot be relied on as the sole communication vehicle for the project.
16. Page 2-10, Section 2.1.4: In the second to last paragraph in this section, some clarification on the math related to numbers of acreage is needed. It appears that 16 acres are missing from the total acreage (997 acres).
17. Page 2-14, Table 2.1-3: Describe any emergency holding lagoons/tanks to divert and contain spills or other inadvertent releases before discharge to stormwater outfalls.

Similarly, describe any emergency holding lagoons/tanks planned for wastewater in the event of spills or upset conditions.

18. Page 2-18, Section 2.1.2.3: It would help to explain why the possibility of using the Rail Spur Site for transport of hazardous substances to be used at the facility is not being considered. It would seem to be a safer transportation mode and likely preferable to the large number of tanker trucks running along our roadways which are susceptible to accidents and chemical spills.
19. Page 2-20, Table 2.1-4: Describe in more detail the spill protection (e.g., secondary containment) that will be provided for the locomotive shed sump that is intended to collect waste fluids.
20. Page 2-24, Table 2.1-5: For the pedestrian walkway and bridge consider providing some walking paths, Micron could also connect trails to some wetlands with interpretive signage. Consider including walking/jogging trails at the main plant site for employees use during breaks. It would be a nice way to connect with nature and could include interpretive signage near or within wetlands or any historic sites.
21. Page 3-3, Footnote 23: the footnote refers to industrial-zoned properties but revise to include commercially-zoned properties if they would also be acceptable for a warehouse.
22. Page 3-13, Figure 3.1-4: There is a symbol for Industrial wastewater conveyance (brown line type), but I could not find any such linework in the figure. Please review and adjust if needed. This same comment applies to Figure 3.1-7 on page 3-16.
23. Page 3-23, Section 3.1.3.2: In Construction Effects subsection, it is unclear whether converting prime agricultural land requires mitigation, like land grants to maintain agricultural property in perpetuity. Also, this analysis ignores the fact that this campus will spur additional commercial and industrial development, which should be addressed.
24. Page 3-26: Land Use Changes subsection, there is reference to two remaining properties that Micron does not have access to, and that OCIDA may need to go through eminent domain to obtain access. Given the time and effort associated with the eminent domain process, the EIS should note this (along with all the other approvals needed) as potential schedule impacts so the public is aware.
25. Page 3-36, Table 3.2-1: Under New York State Material Management Program, clarify whether NYS Beneficial Use (BUD) program would apply here, for reuse of fill material excavated from the site.
26. Page 3-38, Figure 3.2-1: There are no borings east of Burnett Road so any observations and conclusions regarding site geology and geotechnical competence of bedrock should be qualified to note that portions of the site were not

- characterized. The DEIS should indicate that borings in uncharacterized development areas will be collected at a later date.
27. Page 3-39, Section 3.2.2.1: In the second paragraph there is reference to glacial till being up to 164 feet thick yet Figure 3.2-1 indicates bedrock is shallow, only as deep as 33.5 feet. This discrepancy should be explained.
  28. Page 3-48, Section 3.2.3.2: Specify what utilities will be installed underground at the facility, and whether shallow groundwater will be an issue with construction. Also, some discussion on rail-served quarries and whether there is sufficient quantity of rail-available aggregate (the DEIS indicates the project will require 9 million cy) needs to be included as it can have a significant impact on the overall project schedule (this comment applies to page 3-51 as well). It is not clear whether bedrock removal is based on elevation of bedrock or bedrock competency for foundational support. Please clarify the basis for bedrock removal in the Final EIS.
  29. Page 3-50, Section 3.2.3.2: In the discussion regarding blasting please describe mitigation efforts to monitor and/or protect nearby buildings and structures, as well as planned communications with residents in the vicinity.
  30. Page 3-51, Section 3.2.3.2: The final paragraph references SPDES permitting for stormwater management during construction. In this section, and perhaps more importantly the sections on air emissions and water resources there needs to be a recognition that fugitive dust emissions may exceed the allowable particulate levels off the property (as well as complaints about dust impacting residents' properties, even if they are below the allowable thresholds), and releases of turbid waters that escape the SWPPP-prescribed protective measures should be expected. While they may be short-lived and corrected in a prompt manner the public should be made aware of the likelihood that such releases exists. A complaint hotline should be established for the project along with a management system to track complaints and document resolution.
  31. Page 3-53, Section 3.2.3.2: Connected Actions subsection, please make sure to include the two 15 million gallon storage tanks planned at OCWA's facility on Rt 31.
  32. Page 3-53, Section 3.2.3.2: Operational Effects subsection, it would be prudent to include the possibility that groundwater pumping to contain contamination from spills could be possible in the future, which would have an effect on groundwater elevations and quality.
  33. Page 3-54, Table 3.2-5: The listing of groundwater monitoring using 17 wells during construction comes out of the blue, and should be described earlier in the text. I may have had comments on the proposed monitoring but no details were provided.

34. Page 3-60, Table 3.2-6: There is reference to SPDES Individual discharge permit, but no mention of a pretreatment permit for the Micron Facility with Onondaga County, please add reference for such in the table.
35. Page 3-72, Section 3.3.4.2: In the subsection on wetlands construction effects there does not appear to be any discussion regarding the effects that the development and construction over 1000 acres (permanently destroying about 200 acres) will effect the remaining wetlands. I find it hard to fathom that such massive construction won't have a negative effect on remaining wetlands, including under unforeseen upset conditions. This needs to be recognized and assessed in the Final EIS.
36. Page 3-78, subsection on Stormwater, the first sentence indicates that construction of the facility will result in temporary alteration of land type and soil type, but it will permanently change the land type and soil type as all overburden soils are being replaced with aggregate, and the land type will be industrial rather than vacant. Please revise this subsection accordingly.
37. Page 3-79, Groundwater subsection, the text implies that groundwater is not used for potable water, but there is no discussion about a thorough well survey in the project vicinity, just a public records search which would not pick up wells installed prior to NYS requirement for well construction to be reported. Spills at the facility could contaminate the groundwater at the facility and potentially migrate off site; this needs to be addressed as contaminating private drinking wells would be a significant adverse effect. Also dewatering to facilitate excavation and installation of foundations could impact wetlands through drawdown of the water table and this needs to be evaluated to assess potential impacts on wetlands as well as off-site private wells (if any) in the vicinity. Finally, I could find very little discussion about the 42 monitoring wells installed at the facility. It would be very helpful to include results from monitoring to date (both potentiometric data as well as any conventional parameters or hazardous substances sampling) in the Final EIS.
38. Page 3-82, Wetlands Operational effects, The BMPs during operations will be different than those used during construction (which are inherently temporary). Also, the first sentence of the second full paragraph says the construction general permit (CGP) would apply to operations but I would expect an individual SPDES permit for the operational phase stormwater discharges. This needs to be reconciled.
39. Page 3-83, Surface Water subsection, I appreciate Micron committing to installing treatment for removal of emerging contaminants, such as PFAS, from the wastewater stream even if not required under their SPDES permit. However, I'm

interested in better understanding the anticipated concentration of individual PFAS substances in the wastewater and the target removal efficiencies, so the Final EIS should provide such detail. Also please describe what other emerging contaminants are being contemplated for treatment.

40. Page 3-84, Surface Water subsection, there is no discussion regarding the impacts that spills, upset conditions or other accidental releases will have on wastewater discharges, so this section needs to be revised to indicate the possibility and potential consequences (see General Comment on this topic).
41. Page 3-85, Table 3.3-11: I would encourage Micron to continue to explore creative methods for managing stormwater at the facility, to further minimize adverse effects from stormwater discharges. There are some good suggestions in the table but more creativity is warranted for such a large impervious surface. I did not see any indication of containment systems (e.g., gates on catch basins, emergency impermeable holding basins, tanks etc.) to enable containment and capture of spills and other inadvertent releases at the facility that reach the stormwater conveyance systems. In the paragraph under the table there is mention of the 42 monitoring wells again. It would help to provide what the goals of the monitoring are, what parameters will be monitored and criteria the results will be compared to.
42. Page 3-86, Groundwater subsection, as noted in previous sections adverse effects from spills and other inadvertent releases needs to be described in better detail. Simply saying the facility will have a SWPPP, SPCC Plan and clean up spills immediately is good but it is very superficial and completely ignores the adverse effects if releases escape the containment systems. The text should indicate that spills and accidental releases are inevitable, and describe the specific design measures in the system to prevent spills from reaching soils and groundwater. Also, what soils and groundwater sampling will be performed following spills to ensure they were adequately cleaned up. Finally, the conclusion that there will not be a significant adverse effect needs to be qualified with an assumption that spills are adequately contained, cleaned up and verified but that a significant adverse effect could result if spills/releases unacceptably contaminate groundwater, surface water or atmosphere.
43. Page 3-88, Summary of Effects subsection, there is a very weak assessment of wastewater discharges to the Oneida River, there is no mention of potential spills, other releases or treatment equipment malfunctions causing releases into the Oneida River, Oswego River and Lake Ontario. As mentioned in the general comments the OCWA water intake is in vicinity of the Oswego River discharge so if

there was a significant spill contaminating the rivers it could contaminate the County's water supply.

44. Page 3-88, Section 3.3.5, Table 3.3-12: The benefits description under the water recycling BMP should not include GHG emissions and solid waste generation, they should be described in their respective sections. Also, the benefits of groundwater monitoring should more accurately say they "document" conditions. They don't necessarily verify things are acceptable as the monitoring may show otherwise. Claiming the benefit side of the monitoring ignores the possibility of showing problems, and therefore is misleading. The table should be revised to more accurately reflect what the monitoring will accomplish, which is documenting actual conditions.
45. Page 3-89, Table 3.3.-12: In the bullet list there is an auto shutoff valve mentioned, but this will require real-time monitoring which is not possible for all discharge parameters, so the bullet should be qualified as such. The bullet list mentions an Accidental Spill Prevention Plan but it was not mentioned when spills were discussed previously, please describe this plan as it relates to the SPCC Plan. Spill response should also be included in the table.
46. Page 3-92, Table 3.3-13: The proposed wetlands mitigation ratio of 2:1 is quite inadequate for the high-quality wetlands (the EIS previously indicated that these are high quality wetlands) that will be permanently destroyed. Using multiple smaller areas in a disjointed fashion would also justify a higher overall mitigation ratio.
47. Page 3-105, Table 3.4-3: Please label the units (acres) more prominently on the Table.
48. Page 3-114, Table 3.4-6: Please label the units (acres) more prominently on the Table.
49. Page 3-124, Subsection on Bats: I would encourage Micron and the agencies to develop some more creative mitigation efforts, like building structures for bat roosting in safe, but nearby locations. In addition, please mention whether bats can be captured and relocated. I see Table 3.4-12 has some roosting boxes which is a good start but I would encourage additional creativity to truly minimize the adverse effects on bats.
50. Page 3-125, last sentence in Bats subsection: The last sentence references ongoing coordination and consultation. The Final EIS needs to discuss whether this will be completed prior to the intended start date for construction, or whether construction will be delayed until completion of coordination and consultation.
51. Page 3-127, subsection on Lake Sturgeon: The text indicates that the IWWTP will not involve any construction in the Oneida River, yet the treatment plant is being

expanded to allow discharge of an additional 33.5 MGD, which would intuitively appear to require an increase in the outfall capacity or installation of an additional outfall. Please verify the existing outfall does not require any modification to accommodate the additional flow.

52. Page 3-128, subsection on Operational Effects: This is not necessarily specific to this subsection, but the Final EIS should explore some stormwater retention features to provide beneficial habitat for some species. There are likely other opportunities for designing in habitat improvements to attract wildlife and mitigate impacts associated with the significant loss of habitat. This same comment applies to Table 3.4-11 on pages 3-133 and 3-134 under landscape management.
53. Page 3-145, Section 3.5.3: The text on page 3-144 indicates the Phase 1B investigations are ongoing. The text on page 3-145 indicates these investigations will be completed as well as all consultations completed prior to any intrusive construction in 2025. This seems like an important critical path item for the schedule. The Final EIS should provide a realistic schedule for these efforts so the public is aware of any construction schedule delays.
54. Page 3-160, subsection on Construction Effects: The text on stationary sources indicates generators will run 12 hours/day, but Footnote 54 indicates 16 hours/day. Please reconcile the discrepancy or explain the difference. Also see prior comment on Town approval that is needed to increase allowable construction hours.
55. Page 3-163, Table 3.6-7: Please reference where these emissions estimates are derived. Footnote 55 indicates estimates can be found in air permit application packages for Fabs 1 and 2, these should be provided in an appendix for ease of review. Appendix I-1 indicates the estimates are for the 4 Fab scenario so the appendix and text need to be better synchronized and referenced accordingly.
56. Page 3-164, subsection on Connected Actions Operations Effects: The list of wastewater treatment components needs to include the PFAS treatment processes described on page 3-83.
57. Page 3-167, subsection on Air Dispersion Modeling: The text in the second full paragraph, along with the referenced footnote 58, asserts that emissions from IWWTP are not significant and not included, but would be if needed at a later date. The Final EIS needs to provide more technical basis for excluding the emissions, simply asserting they are not significant is not appropriate without some backup.
58. Page 3-170, subsection on Effects Determination: The conclusion at the top of the page stating no significant adverse effects ignores emissions during upset conditions and air pollution control equipment malfunctions. Similar to my comments regarding the lack of adequate consideration of spills, the air quality

section needs to add in discussions regarding the adverse effects of upset conditions and other inadvertent releases to the atmosphere. While it may not change the overall conclusion about significant adverse effects it is imperative the public be made aware of these situations. Also, it appears that the different sources are assessed separately, yet there will be both construction and operations emissions between 2029 and 2041 so the cumulative effects of both construction and operations need to be considered for the coincident time periods and presented in the Final EIS.

59. Page 3-171, Table 3.6-13: The last paragraph makes reference to construction emissions listed in Table 3.6-13 being less than 1% of the total NYS emissions, except for sulfur dioxide. I fail to see the relevance of comparing the emissions to the entirety of NY state, please explain why this is relevant, just because it is 1% of the state's total emissions doesn't mean it isn't significant to the local community in Clay and Cicero.
60. Page 3-183, Section 3.7.2.1: The second to last sentence in the first paragraph does not make sense. I have read it multiple times and still don't understand the point being made, so please revise to reduce confusion in the Final EIS. The Scope 1: Direct GHG Emissions subsection references on-site fossil fuel power generation. If this is in reference to emergency generators the text should be clarified, as written it could be construed that the Micron facility will have full-time fossil fuel generators running. Also, it's not clear how the emissions from emergency generators are handled in the GHG estimates (i.e., the assumptions about how often they are used, does the analysis only include the routine exercising of generators, or some assumed usage during power outages?). I could not locate relevant assumptions in Appendix J-1.
61. Page 3-210, Section 3.7.4: In the paragraph regarding extreme weather events the text should describe the how the basis of design for stormwater management will account for more extreme rainfall events. Traditional design uses historic data to define various storm event frequency/probability (e.g., 25 year 24 hour storm) that the system components will be designed for. The text needs to describe how extreme events will be accounted for to minimize the potential for flooding at the site, or cause flooding of neighboring properties. The text on page 3-211 regarding stormwater management provides some basis of design information, but does not explain how future increases in storm intensity will be accounted for. A sensitivity analysis would be a useful tool during design to help optimize the protectiveness of the stormwater management system. Also, this paragraph emphasizes the need for good spill response management as infiltration basins will facilitate transport of any

spills that reach the stormwater system into the groundwater, further supporting my concerns regarding spills.

62. Page 3-215: The sentence directly below Table 3.7-14 indicates Micron commits to purchasing 100% carbon-free electricity. However, I recall there being a prior commitment by Micron to utilize 100% renewable energy. This section should be revised to explain why Micron has changed the important commitment to utilize 100% renewable electricity.
63. Page 3-217, Section 3.8.1: The last paragraph indicates there are no local regulations or laws regarding hazardous waste or hazardous substances, which may be true but Table 3.8-1 does include local laws and regulations for solid waste. The text should be revised to note the local requirements listed in the table, or delete the sentence regarding local regulations in the paragraph.
64. Page 3-218, Table 3.8-1: The description for TRI under EPCRA should more clearly note the reporting requirements so the public understands that there will be periodic reporting about toxic releases that they will have access to. The latter part of the description implies the reporting but some additional clarity is warranted.
65. Page 3-220, Table 3.8-2: The table only references obtaining an ID number but there should be much more required for the facility under RCRA so please revise the table accordingly.
66. Page 3-221, Section 3.8.2: It would help to list the 5 counties referenced in the first paragraph. In Section 3.8.2.1 regarding Phase 1 Assessments, it would help to indicate that the scope included a site walk of the properties examined. Also, it appears there were no Phase 2 activities completed on the properties but I would recommend Micron complete some baseline sampling of soils, groundwater, surface water, noise and air at the site (and surrounding areas for air and noise) so they know what conditions existed when taking ownership of the property. It could help in the future if extraordinary conditions arise, to establish whether conditions changed and to what extent.
67. Page 3-222, Section 3.8.2.2: It would help to note if any hazardous substances (e.g., asbestos, lead paint, PCBs) were removed when homes were demolished. In the paragraph regarding National Grid's substation it should be noted whether any herbicides were used that could have contaminated groundwater (note arsenic based herbicides were commonly used at substations), are/were there any PCB containing transformers or capacitors, and whether an SPCC Plan exists to cover the bulk petroleum tank. The same comment applies relative to an SPCC Plan at the LOWTP and OWWTP.

68. Page 3-224, Section 3.8.2.3: It would help to note the available permitted capacity remaining at Seneca Meadows and High Acres landfills and any planned expansions that need to be permitted.
69. Page 3-226, Table 3.8-3: In the first entry assess whether uncontaminated excavated soil ineligible for beneficial use could be used as landfill cover at solid waste facilities. It would be another form of beneficial use. Relative to footnote 72, I recommend the backup for the estimated quantities be provided in an appendix and referenced as such in the footnote.
70. Page 3-228: In the final paragraph it would help the reader to provide a preliminary estimate of the amount of soil to be reused on site. In addition, please assess whether some of the excavated wetland soils could be used in wetland restoration at the proposed mitigation sites. It may be optimistic to assume all remaining soils would be recyclable, which is inconsistent with Table 3.8-3 that indicates some soils may need to be disposed in commercial landfills.
71. Page 3-229: As noted previously please assess whether some of the soils described in the first paragraph could be used as daily cover at the landfills.
72. Page 3-233: This comment applies more generally but I recommend that the backup for all the estimates provided in this EIS be clearly documented in appendices. I believe it is imperative that the public understand, and be able to ground truth, the basis and derivation of all estimates. In the second to last paragraph describing industrial wastes, I would expect to see water and wastewater treatment sludges, spent filters, used PPE and other solid wastes, not just spent chemicals.
73. Page 3-235, Table 3.8-5: Describe the basis for determining that the non-hazardous sludge from wastewater treatment can be beneficially used. This could be accomplished using a footnote explaining the basis for concluding it can be beneficially used.
74. Page 3-236, Table 3.8-6: Describe which category wastes containing PFAS will fall under (i.e., RR, non-hazardous or hazardous). I could not find anywhere in the report or Appendix K where the estimated disposal volumes are derived. I had expected to see a table summarizing all the listed and characteristic wastes (by individual waste number) that make up the summary numbers shown in the text. Indicating they are based on data from other Fab sites is reasonable but additional backup detail is warranted.
75. Page 3-238: In the second paragraph where emergency response is discussed with notifications to first responders, there should be some discussion (or reference to another section where it's discussed) about training that will be provided to all first responders as well as hospital/urgent care facilities regarding the unique hazards,

risks, and appropriate medical response to the myriad of chemicals that will be used at the facility. With respect to hazardous waste management I would like to see more detail regarding the design of chemical/waste loading/unloading facilities, storage facilities (tanks, drums, ISO tanks, gas canisters, etc.), and conveyance systems. Somewhere secondary containment is mentioned and details on what that consists of would also be helpful to understand. This comment also applies to page 3-244.

76. Page 3-241: In the discussion regarding PFAS I would like to better understand what suite of PFAS compounds is proposed to be used along with a material balance showing the supply and disposition of the individual PFAS components. This could be included in one of the appendices. It sounds like there is uncertainty with identifying a disposal option, therefore if Micron cannot find an acceptable disposal facility, PFAS wastes will need to be stored at the facility for prolonged period of time, or properly stored somewhere and this needs to be discussed in the Final EIS. I would recommend that Micron verify with each disposal facility whether the disposal facility will accept wastes that contain PFAS. My experience has been that some solid waste disposal facilities will not accept wastes containing PFAS (regulated or not), so some additional due diligence to verify acceptability for disposal of wastes containing PFAS is appropriate. The text should explicitly mention that the TRI listed PFAS compounds represent a very small fraction of all PFAS compounds, and specifically what fraction of PFAS compounds used at the facility will be subject to TRI reporting.
77. Page 3-241: Hazardous Materials subsection: In the list of example hazardous materials at the bottom of the page please add arsine if it will be used at the facility given its highly toxic characteristics.
78. Page 3-242, Table 3.8-10: This table highlights the significant quantities of hazardous materials that will be stored on site, which includes a total of 55,780,000 gallons of bulk chemicals, and about 15,000 55-gallon drums. These quantities are broken down in general chemical types, but as noted in the general comments the DEIS, it does not list the specific chemicals delivered, stored and used at the facility. The Final EIS needs to include a complete list of chemicals used at the facility along with the quantities (by chemical) delivered, stored, used and disposed. The details can be provided in an appendix with Table 3.8-10 summarizing the total quantities by category. The Table should also clarify whether the quantities represent raw chemicals for use, or whether it includes both raw chemicals as well as wastes. Finally, somewhere in this section the EIS needs to indicate which waste type PFAS compounds will fall under.

79. Page 3-243: In the third paragraph there is mention about shippers having spill procedures in place but protocols for spills at the Micron facility during chemical delivery unloading and loading for disposal or recycling needs to be described.
80. Page 3-250, Table 3.8-13: The entries describing spills are very superficial and, as noted in previous comments, spills and other inadvertent releases deserve much more discussion in this EIS. They have the potential to contaminate building materials, soil, groundwater and surface water as well as potentially result in unacceptable employee exposure.
81. Page 3-254, Footnote 88: It seems acceptable to say that connected actions will have similar H&S protocols for construction, but I don't see how that would apply to operations. There are substantially different operations at connected actions compared to the Micron facility, where there is significantly more chemical usage and very unique workplace hazards.
82. Page 3-257, Table 3.9-2: In the risk management measures for toxic and sensitizing hazards describe whether the exhaust from gas operations will be treated prior to discharge. The same comment applies to Table 3.9-3.
83. Page 3-271, Figure 3.10-3: The text explaining the figure should provide the rationale for why only limited buildings would have solar panels installed. This is a lost opportunity for renewable energy and more energy independence for the facility, and warrants more rationale.
84. Page 3-274, Figure 3.10-4: It is unclear what pretreatment will occur at the Micron facility compared to the treatment by Onondaga County at Oak Orchard. Some clarification in the text and on Figure 3.10-4 would help.
85. Page 3-295: In the bus and rail sections it seems like a great opportunity to identify ways to improve mass transit to support the Micron facility, which would help alleviate passenger vehicle traffic problems and also potentially reduce the GHG footprint for the project. This should be explored by the county in more detail so we don't miss out on a great opportunity to improve our mass transportation infrastructure.
86. Page 3-297: In the third bullet describing traffic accident risks please add increased risk of chemical spills from trucks delivering and transporting wastes, particularly during the years when Fabs 1 and 2 are operating but Fabs 3 and 4 are under construction.
87. Page 3-298: The proposed schedule for traffic improvements seems very optimistic, and they are critical to minimizing impacts to community. As noted in the general comments, describe whether there are an adequate number of qualified

contractors to complete all the traffic improvements along with all the development at Micron.

88. Page 3-339, Section 3.11.3.6: Similar to the comment regarding mass transit, it appears we could improve the bike and pedestrian access to the area to encourage more alternatives to accessing the facility. With all the roadway improvements it wouldn't be too much more effort to improve bicycle and pedestrian access, perhaps with auxiliary parking at strategic locations.
89. Page 3-361: In the first full paragraph describe how noise and dust during the construction of traffic improvements (between 2027 and 2031) is addressed.
90. Page 3-397: In the first bullet mention that less audible backup alarms, such as quackers and strobes (nighttime only) will be considered as well. Backup alarms are notorious for resulting in complaints, even if average noise levels are acceptable.
91. Page 3-399: In the final paragraph it would help to estimate the fraction of EVs expected, which would tend to reduce the vehicle noise and GHG emissions.
92. Section 3.14: Incorporate previous comment regarding training of first responders and hospital staff on unique potential hazards at the Micron Facility.
93. Page 4-17, Groundwater subsection: The language in this subsection regarding adverse effects on groundwater should be included (in a contextually modified form) in Section 3 as noted in previous comments. This language is more reflective of the risks posed by spills and other inadvertent releases. In addition, there is mention of karst geology here, yet the section describing the Micron facility indicates no karst features. Similar language about the adverse effects of spills should be provided for adverse effects on surface water, soils and air as well.
94. Page 4-33, Section 4.3.15.2: subsection on Housing, please verify Great Northern Mall is still planning on developing housing at the site. I recall recent reporting that they are reconsidering development of a shopping area.



# United States Department of the Interior

FISH AND WILDLIFE SERVICE  
3817 Luker Road  
Cortland, New York 13045



August 11, 2025

David Frenkel  
Environmental Division Director  
Chips Program Office  
Department of Commerce  
100 Bureau Drive  
Gaithersburg, MD 20899  
david.frenkel@chips.gov

Dear David Frenkel:

This responds to the request for comments by the US Department of Commerce (Commerce) and Onondaga County Industrial Development Authority (IDA) on the Draft Environmental Impact Statement (DEIS) Report dated June, 2025 which evaluates the proposed Micron Semiconductor Manufacturing Project to be located in the Town of Clay, Onondaga County, New York.

Thank you for providing the U.S. Fish and Wildlife Service (Service), as an interested agency, the opportunity for this review pursuant to the National Environmental Policy Act (NEPA) and the New York State Environmental Quality Review Act (SEQRA). The Service previously provided comments on Pre-Draft versions of the document, and we consider this to be our final set of comments on outstanding issues.

Commerce is the lead federal agency for the project and in addition to NEPA, has responsibilities under Section 7 of the Endangered Species Act (ESA) (87 Stat. 884, as amended; 16 U.S.C. 1531 *et seq.*) to consult with the Service regarding projects that may affect federally listed species or designated critical habitat, and confer with the Service regarding projects that are likely to jeopardize federally proposed species and/or adversely modify proposed critical habitat. Section 7 consultation is ongoing, and we anticipate it will be completed in the near future.

Attached to this letter is a table with our latest comments on the DEIS. In summary, we found that there are discrepancies with the acreages within sections of the document and also between the DEIS and the Biological Assessment. We also suggest some text changes to the document to expand upon or make clearer the text describing the biological resources and project effects. We understand that this is an enormous project with many components, and it is difficult to maintain consistency with so much information.

Thank you for your coordination and consideration of these comments. If you require additional information, please contact Tim Sullivan at 607-753-9334 or [tim\\_r\\_sullivan@fws.gov](mailto:tim_r_sullivan@fws.gov). Future correspondence with us on this project should reference project file 2024-0005791.

Sincerely,

Ian Drew  
Field Supervisor

cc: NYSDEC, Syracuse, NY (K. Balduzzi)  
NYSDEC, Albany, NY (D. Rosenblatt)  
COE, Auburn, NY (M. Crawford)

Attachment

Attachment: U.S. Fish and Wildlife Service Comments on June 2025 Micron Semiconductor Manufacturing Project, Clay, NY Draft Environmental Impact Statement, June 2025.

| DEIS Section                                                             | Text (page numbers from pdf document)                                                                                                                                                                           | FWS Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|--------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>3.3 Water Resources, Wetlands, Section 3.3.3.1</b>                    | Text describing existing wetland resources and Table 3.3-5. “Ramboll classified the 408.61 acres of delineated Federal jurisdictional wetland identified within the proposed Micron Campus as a mixture of ...” | There seems to be a discrepancy between the text and Table 3.3-5 (pg. 3-65), which says there are 422.20 federal wetlands on Campus. The ** footnote does not seem to clarify this.                                                                                                                                                                                                                                                                                               |
| <b>Section 3.4.4 Environmental Consequences (Ecological Communities)</b> | Table 3.4-8 (pg. 3.117)                                                                                                                                                                                         | Text in the table describes the effects and mitigation of fragmentation. We recommend a project commitment be added here that forested areas that will remain undisturbed are properly; reference to construction monitor who would monitor invasive plant establishment, if this will be part of the monitor’s scope of work; and under altered composition: consider changing “where feasible” to the “maximum extent practicable.” Native plants should be the default choice. |
|                                                                          | Effects on mammals and birds, pg. 3-118, 3-120                                                                                                                                                                  | Please consider the carrying capacity of the adjacent or nearby habitat these animals might relocate to and give context as to how much habitat is available.                                                                                                                                                                                                                                                                                                                     |
|                                                                          | Special Status Species (Table 3.4-9)                                                                                                                                                                            | We acknowledge that the No Effect determination for the tricolored bat will be revised in the Biological Assessment (BA).                                                                                                                                                                                                                                                                                                                                                         |
|                                                                          | Tree clearing commitment, pg. 3-123                                                                                                                                                                             | Text states, “all tree clearing...would only occur within the winter hibernation window from November 1 through March 31.” Please revise to include the “shall occur” commitment language.                                                                                                                                                                                                                                                                                        |
|                                                                          | Loss of 335 acres of roosting habitat for the Micron Campus and rail Spur Site, pg. 3-123; loss of 82 acres for all connected actions, pg. 124                                                                  | This does not agree with the BA, which says a total of 727 acres would be lost (which includes all actions; 467 acres for the campus and rail spur site). These acreages should be consistent across all documents. Discuss the remaining 307 acres of forested habitat. A table similar to Table 11 in the BA would be useful in discussing roosting habitat loss (and remaining habitat)                                                                                        |
| Operational effects on bats                                              | Table 3.4-10, pg. 3-132                                                                                                                                                                                         | It appears this table quantifies habitat loss due to cumulative growth through 2041, but it is unclear what these table entries mean (what do the numbers not in parentheses mean). It appears to be inconsistent with the forested (roosting habitat) loss in Table 14 of the BA.                                                                                                                                                                                                |
|                                                                          | Table 3.4-11 BMP, pg. 133                                                                                                                                                                                       | Please update this table with the correct acreages. 307 acres of forested habitat will remain; landscape management: use of native species should be the default choice; please update this table to reflect the project commitments of the Biological Opinion (BO).                                                                                                                                                                                                              |
|                                                                          | Section 3.4.5.2 Mitigation Measures                                                                                                                                                                             | BO will also include Conservation Measures, that include the mitigation plan; please update Table 3.4-12 to be consistent with the BA                                                                                                                                                                                                                                                                                                                                             |
| <b>Cumulative Impacts</b>                                                | Section 4.4.4 Water Resources – Wetlands, pg. 4-14-4-15                                                                                                                                                         | Please acknowledge that, on a regional basis, cumulative impacts to wetlands from the projects listed in Table 4.2-1 are likely to be substantial on                                                                                                                                                                                                                                                                                                                              |

| <b>DEIS Section</b> | <b>Text (page numbers from pdf document)</b> | <b>FWS Comment</b>                                                                                                                                                                                                                                                                 |
|---------------------|----------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                     |                                              | downgradient functions and services, despite BMPs and mitigation measures.                                                                                                                                                                                                         |
|                     | Section 4.3.4 Biological Resources           | Besides the loss of forested habitat, which is discussed, please consider the increased human activity, noise and light expected from these projects on a regional basis. Cumulatively, these effects would decrease suitable habitat for listed bat species and wildlife overall. |

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**From:** Paula Durbin-Westby <durbinwestbyindexing@gmail.com>  
**Sent:** Monday, August 11, 2025 2:01 PM  
**To:** chipsnepa@chips.gov  
**Subject:** [EXTERNAL] MICRON

I am writing with concerns about the MICRON Project. Too many questions have been left unanswered. Some of the main ones regard environmental impacts. Hundreds of acres of wetlands stand to be destroyed with no apparent mitigation plan available. Chip disposal has not been addressed adequately, given that wastewater measures are not in place. Page 18 of the report, regarding low-GHG alternatives, is entirely speculative, given that the company already knows that low-GHG alternatives really don't exist at this point in time. The same is true for HTFs. As for wastewater, committing to the hope that by 2030 they might reuse or recycle 75% of the water does not address the huge amount of potable water (aka drinking water) that will be used for the first five years. Chip manufacture requires potable water, not non-potable water. This potable water use will impact the water table and aquifer.

Greenhouse gas emissions. As you might know, nitrogen trifluoride is one of the top greenhouse gases of concern. Throughout the report, Micron notes that "technically viable alternatives have not been found" to either the use of NF<sub>3</sub>, or its derivatives that are generated by the manufacturing processes. Repeated mention is made of these gases being "emitted" but no mention that I see of what will be done about the emissions, which can impact families living in the area, as well as the overall health of the environment.

The idea of 50,000 jobs but actually only 9,000 "high-paying jobs" means that the bulk of the jobs will be low-paying, or temporary during the construction phase. The entire "jobs" package looks severely inflated.

I urge you to reconsider, or at least defer, bringing such a large manufacturing facility with so many either unknown or unaddressed potential impacts to the area.

Regards,

Paula Durbin

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**From:** Chris Egan <chrisegan01@gmail.com>  
**Sent:** Monday, August 11, 2025 6:17 PM  
**To:** CHIPSNEPA@chips.gov  
**Subject:** [EXTERNAL] Comments on proposed Micron plant

As a 70 year resident of NYS, living in both Onondaga and now Oswego county, the changes that are about to happen surrounding the construction of these 4 Micron fabs in Clay, offer benefits to those who are focused on job creation in the Upstate NY area to offset the loss of so many jobs and large manufacturing facilities that are gone.

Yet at the same time, this progress for many also represents major inconveniences and ongoing hardships to residents who live in close proximity to where this plant would potentially be located. It is unfortunate that people in power chose to put a plant of this magnitude in an already congested area that will decimate the areas around it in ways too numerous to count. One issue that is not getting the coverage it should, relates to potential odor/smell/foul air that could be emanating from this plant.

Perhaps this foul odor issue is why a Micron executive who is relocating to this area has made it a condition for the local real estate company assisting in the purchase of their home in this area, that they will look at no houses within a 5 mile radius of this plant, referencing the potential foul odor/smell as their main concern.

As a point of reference towards the potential foul odor from this plant in Clay being a real issue: information about the foul odor issues at the Micron plant in Manassas, Virginia is available online. It appears to be an ongoing, unresolved issue for those residents near this plant, which Micron acquired in 2002. That's 23 years and they appear to be still dealing with the foul odor problem. What could that history mean for this area?

Many at the 3 public hearings on July 24<sup>th</sup> referenced the environmental challenges surrounding the plant with wildlife and water referenced much of the time. Not much was mentioned about the air quality potentially being affected. So aside from those important environmental issues, what assurance do CNY residents living within 5 miles of this plant in Clay have, that the issues with foul odor will not happen here?

The Micron executive coming into this area clearly has concerns of their own regarding potential foul odors emanating from the plant, and clearly possesses information we are not privileged to know regarding this issue. Lots of "trust us to do the right thing" kind of comments have been made about many issues of environmental concern, but who will guarantee we will not have the same issues with foul odors specifically as the people in Virginia? Those residents who live in Cicero to the east of the plant beyond the 5 mile radius, might be concerned about what they may be smelling at some point too, since the prevailing winds blow mostly in that direction.

There are many of us living within this 5 miles radius surrounding the proposed plant who have lived in NYS for many years, paid state, local and real estate taxes, raised families and supported local businesses. Many of us planned to live here through retirement years, and will be directly affected by what will be happening with the plant construction and manufacturing. While property values will more than likely be increased by local assessors as more and more people move into this area, there are those residents who have no plans or interest in selling, so increases in their property value will only result in increases in real estate taxes for them.

When the extreme inconvenience this plant in Clay will cause residents in that 5 mile radius from increased traffic to grocery shopping, buying gasoline, dining out, retail shopping and medical care -- and the potential foul odor issue, which unfortunately will not be evident until the plant is long established unless steps are taken now to guarantee this will not happen -- perhaps Onondaga and Oswego counties could offer those residents within that 5 mile radius of this plant a small gesture to recognize the contribution they have made to their communities for many years, and the upcoming inconveniences many of us will be dealing with for years to come if this plant is built -- and who are gaining basically nothing positive from the plant's construction.

The gesture? Once shovels go into the ground, and the project actually begins, the assessments on all properties within that 5 mile radius will be capped at the current level as of that date, with NO increases made by the assessors in these areas until the property at some future date is sold, and the property could then be re-assessed. This does not seem an insurmountable task or cost to the 2 counties for assessors to determine what residents fall within this 5 mile radius, and offer a simple, written agreement to these residents that their assessments will not be raised until the house would be sold to a new owner at some future date.

It appears Micron is moving full speed ahead because of the powerful forces at play who want it to happen. If this plant does materialize, the small gesture of no raise in assessments for residents in that 5 mile radius will make those of us who have made upstate NY our home for years with no plans to leave, help us feel we, too, are valued instead of invisible and unimportant.

And, if the foul odor/smell issue materializes here as well, we will at least be given something for what will end up being a major inconvenience and degradation to our way of life in our own homes, as well as a potential devaluation of our home's value as an unpleasant side effect of compromised foul air quality we can then do nothing about.

The requests in this letter are twofold:

1. Ensure that there is independent, reliable, ongoing and fact-based evaluation, and determination of the impact the Micron plant will have related to foul odor issues within the 5 mile radius, with solutions identified, implemented and closely monitored, designed to prevent these issues from ever happening.
2. Keep the assessments of those within the 5 mile radius of this plant at the exact amount they are on the date the first shovel goes into the ground.

And finally, to those who are in favor of this project, and do not live anywhere near where the plant will be, ask yourselves this one question: What would you make sure happened with this potential odor/foul air/smell issue -- aside from all of the other environmental and other related negative issues surrounding the plant's construction and operation -- if any of YOU were one of the residents living within that 5 mile radius, as that Micron executive made sure was avoided for their own family.

Thank you.

Chris Egan, 109 Barton Road, Pennellville, NY

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**From:** Diana Elliott <diana.elliott505@gmail.com>  
**Sent:** Monday, August 11, 2025 11:28 PM  
**To:** chipsnepa@chips.gov  
**Subject:** [EXTERNAL] Micron DEIS Public Comments

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Hello,

Please find a list of my concerns and recommendations:

### **1. Regional Growth and Infrastructure**

**Recommendation:** Proactively coordinate with local government and regional planning authorities to ensure infrastructure (transportation, housing, healthcare, schools) scales responsively with workforce growth.

**Rationale:** Unplanned rapid growth can strain public services, degrade quality of life, and increase traffic congestion and pollution.

### **2. Water Quality and PFAS Management**

**Recommendation:** Explicitly commit to deploying state-of-the-art PFAS treatment technologies such as UV-photochemical degradation or similarly effective advanced oxidation processes capable of >99.99% PFAS destruction.

Implement comprehensive water monitoring programs for PFAS and other emerging contaminants in groundwater, surface water, and treated effluent with transparent public reporting.

If environmental laws are weakened in the future, pledge to maintain no less than the laws in place at the beginning of this study, and exceed these standards.

**Rationale:** PFAS contamination poses severe long-term health risks including cancer and endocrine disruption; early adoption of the best available treatment ensures regional water safety.

### **3. Greenhouse Gas Emissions & Carbon Management**

#### **Recommendation:**

Set clear, quantitative short-term and long-term GHG reduction targets aligned with regional climate goals (e.g., net-zero by 2050).

Incorporate embodied carbon accounting into project decision-making with binding reduction goals using low-carbon materials and circular economy principles.

Prioritize on-site renewable energy generation and explore opportunities for carbon offset projects within the region (e.g., reforestation).

Energy demand will increase costs regionally.

**Rationale:** Transparent carbon targets enable accountability; embodied carbon often represents a significant share of total project emissions.

#### **4. Sustainable Architecture and Regenerative Design**

**Recommendation:** Mandate third-party green building certifications (e.g., LEED Platinum or equivalent) for all new construction phases.

Design the building to Passive House standards.

Integrate regenerative landscaping that supports biodiversity, improves stormwater management through natural filtration, and enhances urban heat island mitigation via extensive tree canopy coverage.

Design buildings for adaptability, allowing future retrofits that reduce energy demand or accommodate alternative uses.

Limit exterior lighting/use only dark-sky compliant lights.

**Rationale:** Sustainable design improves occupant health, reduces operational costs, and enhances ecological resilience.

#### **5. Air Quality**

**Recommendation:** Institute rigorous air quality monitoring during construction and operation phases focusing on particulate matter (PM), volatile organic compounds (VOCs), nitrogen oxides (NOx), and other pollutants linked to semiconductor manufacturing.

Adopt best available control technologies (BACT) for emissions abatement including scrubbers or filters as necessary.

**Rationale:** Semiconductor manufacturing can emit hazardous air pollutants; protecting air quality safeguards respiratory health of workers and nearby communities.

#### **6. Community Health & Environmental Justice**

**Recommendation:**

Engage local communities continuously through transparent communication channels to address concerns related to noise, traffic, pollution, and employment opportunities.

Conduct cumulative impact assessments focusing on vulnerable populations disproportionately affected by industrial development.

**Rationale:** Inclusive engagement fosters social license to operate; environmental justice considerations prevent exacerbation of existing disparities.

## **7. Waste Management**

**Recommendation:** Implement comprehensive waste minimization protocols emphasizing hazardous waste reduction, recycling programs, and safe disposal practices for semiconductor-specific chemicals including solvents and acids.

**Rationale:** Proper waste handling reduces contamination risk to soil, water, and public health

## **8. Biodiversity Impact Assessment**

### **Recommendation:**

Conduct comprehensive, up-to-date biological surveys covering all seasons to identify sensitive habitats and presence of endangered, threatened, or candidate species within the project footprint and adjacent areas.

Include aquatic as well as terrestrial ecosystems in assessments.

## **9. Habitat Loss and Fragmentation**

### **Concerns:**

Land development can lead to habitat destruction and fragmentation, adversely affecting wildlife movement corridors and ecosystem connectivity. This reduces biodiversity resilience and can isolate populations of sensitive species.

### **Recommendation:**

Minimize the project's spatial footprint through compact site design and clustering of facilities. Minimize parking lots.

Preserve existing natural habitats, especially mature woodlands, wetlands, and riparian zones. Implement buffer zones around sensitive habitats to reduce edge effects.

## **10. Protection of Endangered and Sensitive Species**

### **Concerns:**

Potential disturbance or displacement of listed endangered or threatened species during construction or operation phases could occur without adequate mitigation.

### **Recommendation:**

Develop and implement species-specific avoidance and minimization plans in consultation with state wildlife agencies and U.S. Fish & Wildlife Service.

Schedule disruptive activities outside critical breeding or migration periods where feasible.

Use exclusion fencing or wildlife crossings where infrastructure intersects known animal pathways.

## **11. Habitat Restoration and Enhancement**

### **Opportunity:**

The project offers potential for regenerative design approaches that support local biodiversity recovery post-construction.

**Recommendation:**

Commit to restoring disturbed lands using native plant communities adapted to local ecological conditions.

Enhance onsite green spaces with pollinator-friendly plants and habitat features such as bird boxes or amphibian ponds.

Incorporate stormwater management systems that mimic natural hydrology (e.g., bioswales, constructed wetlands), which support aquatic organisms.

**12. Monitoring & Adaptive Management**

**Recommendation:**

Establish long-term biodiversity monitoring programs to track effectiveness of mitigation measures, detect unforeseen impacts early, and adapt strategies accordingly.

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**From:** Christina M. Fadden <christinafitch1@gmail.com>  
**Sent:** Monday, August 11, 2025 10:52 PM  
**To:** CHIPSNEPA@chips.gov  
**Subject:** [EXTERNAL] Micron Project, Clay NY

To Whom it may Concern:

With the very unfortunate loss of ~400 acres of woodland/forest to make way for this project, please attend to the following:

1. Allow time and pathways for wildlife species to exit the area as removal progresses. Assist smaller species (including amphibians, reptiles). Begin after migratory birds including songbirds have exited the area. Please do not work at night creating light pollution.
2. Professionally log the area first to recoup the highest value possible from wood and consider reinvesting these funds in habitat restoration and reforestation.
3. Replace trees exceeding carbon capture value for carbon capture value. Not simply the numeric number of trees. The environmental value of a tree is related to its maturity and it takes many young trees to replace the value of a mature tree.
4. Do even better on wetlands offsets/replacement.
5. Be the best and most forward looking environmentally conscious company you can be: make us all proud in this region, be a leader. You can never go wrong with that and it will in fact pay even profit dividends to your company for doing so.

Thank you for your serious consideration.

Sincerely,

Christina M. Fadden  
116 Hiawatha Trail, Liverpool, NY 13088  
315-383-2763 (mobile)

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**From:** Caitlin Ferrante <caitlin.ferrante@sierraclub.org>  
**Sent:** Monday, August 11, 2025 4:43 PM  
**To:** chipsnepa@chips.gov  
**Subject:** [EXTERNAL] ATTN: Micron Project (Sierra Club Public Comment)  
**Attachments:** Sierra Club Micron NY Comment.pdf; Sierra Club Micron NY Comments - Appendices.zip

Dear Members of the CPO and OCIDA,  
Please find attached Sierra Club's public comment on the Micron Project DEIS.  
Also attached is a zip file of references for the public record.  
Thank you for the opportunity to submit public comment on this project.  
Please reach out with any questions/concerns.  
Sincerely,  
Caitlin Ferrante

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**SIERRA  
CLUB**

ATLANTIC CHAPTER

**Caitlin Ferrante**  
Conservation Program Manager  
Sierra Club Atlantic Chapter  
Pronouns: she/her/hers  
[518.426.9144](tel:518.426.9144), [ext.102 \(office\) 607.221.4303 \(cell\)](tel:607.221.4303) | Eastern Time Zone  
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# SIERRA CLUB

ATLANTIC CHAPTER  
744 Broadway  
Albany, NY 12207

August 11, 2025

## Via Email

Onondaga County Industrial Development Agency (OCIDA)  
335 Montgomery Street, Floor 2M  
Syracuse, New York 13202

CHIPS Program Office (CPO)  
National Institute of Standards and Technology  
100 Bureau Drive  
Gaithersburg, MD 20899

**ATTN: Micron Project; Draft Environmental Impact Statement for Micron Semiconductor Manufacturing Project, Clay, NY**  
**RE: Draft Environmental Assessment EISX-006-55-CPO-001**

Dear Members of the CPO and OCIDA,

Thank you for your consideration of the Sierra Club Atlantic Chapter's comments on the Micron Project located in Clay, NY. We are a volunteer-led environmental organization with over 600,000 members nationwide, including over 40,000 members in New York state, all dedicated to protecting New York's air, water and remaining wild places.

We recognize that the semiconductor industry supports critical facets of modern life: these are the microchips and semiconductors that are going to be in our electric cars, our smart grids, and will help us achieve our 21st century solutions, in the post-fossil fuel consuming society we are trying to build towards.

For these reasons, we have the opportunity to make sure that we lead by example at this facility. This is the perfect opportunity for the semiconductor industry and Micron to focus on the idea of a circular economy - for the businesses to take into account the full lifecycle of these products - from idea conception to disposal. To demonstrate to the larger

semiconductor industry that there is indeed room for good actors and that the environmental community, labor, etc can all work together with industry to create a model for 21st century solutions. We are hoping that with our comments on the DEIS, we can help in addressing concerns now, and are not dealing with mass clean ups and mitigating contamination 10- 20 years in the future.

While we are grateful for the Federal and State DEIS processes that have allowed the opportunity for public comment and feedback on this massive project, we do not feel that the 46-day comment period afforded for public comment is in any way sufficient. The proposed project, as described in the 20,000-page DEIS, will affect nearly every aspect of life in central New York and, for some aspects like greenhouse gas (GHG) emissions, across the planet. The Sierra Club supported the effort to extend the comment period to at least 120 days, and are disappointed that this extension was not granted. This project is massive and the impacts to the community (and beyond) will be vast. We hope the lead agencies will take this all into consideration while reviewing comments, and recognize that the comment period was inadequate to capture the breadth of stakeholders and citizens with serious concerns.

There are several areas where the Sierra Club believes the DEIS did not provide enough information on the subject matter discussed. Additionally, the DEIS is lacking in areas where the mitigation measures are not strong enough to address the impacts to the environment in which they will be disruptive. Further, it is well within the province of NEPA and SEQR to consider foreseeable direct and indirect impacts as well as cumulative impacts. This has long been understood as part of the obligation of review.<sup>1</sup>

For these reasons, our comments address the following areas:

- I. Scope of Alternatives Identified in the EIS
- II. Energy and Energy-Related Climate Impacts
- III. Failure to Identify Chemicals & Quantities
- IV. Catastrophic Impact Due to Spill, Leak, or Equipment Failure
- V. Per- and polyfluorinated Alkyl Substances (PFAS)
  - A. Types of PFAS used in semiconductor industry
  - B. Treatment of PFAS in wastewater
- VI. Commercial Solid waste
- VII. Wastewater sludge
- VIII. Hazardous waste
- IX. Effects of chemical waste and other transport on traffic volumes
- X. Air pollution
  - A. NAAQS and Hazardous Air Pollutants
  - B. Incineration of perfluorinated compounds (PFCs) and related gases

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<sup>1</sup> See [Ctr. for Biological Diversity v. Salazar, 695 F.3d 893, 916-17 \(9th Cir. 2012\)](#); [Robertson v. Methow Valley Citizens Council, 490 U.S. 332, 350 \(1989\)](#).

- XI. Addressing the Wetland Concerns at the Site
- XII. Climate and Pollution Impacts Embodied in Construction Materials

Again, we thank you for the opportunity to comment on this project.

### **I. Scope of Alternatives Identified in the DEIS**

The DEIS defines the Preferred Action as the construction of four fabrication facilities (“fabs”). However, the CHIPS funding for the project actually only pertains to the construction and outfitting of two fabs. Moreover, the Scoping Document for this project considered two “build” alternatives:

- 1) Full construction and operation of four fabs over an approximately 20-year period
- 2) Reduced Scale: construction and operation of two fabs over a shorter period.

The Reduced Scale alternative is not considered in the DEIS, based on a stated need for Micron to produce 52,000 wafers per week. However, just prior to the release of this DEIS for public comment, Micron announced plans to build a second fab at its Idaho facility and a new plant on its Manassas, Virginia site. (Jun 12, 2025). *Micron Announces Second Fab*, BoiseDev, <https://boisedev.com/news/2025/06/12/micron-boise-second/>). Given this significant production expansion by Micron, the 52,000 wafer per week production goal may be met in other ways, allowing for Micron to consider a scaled-down version of its Clay facility. Many of the environmental impacts—water pollution, air emissions, generation of solid waste, consumption of energy—are proportional to the size of the facility. Thus, alternative projects of two or three- fab can and must be considered in the DEIS.

The [SEQR Handbook](#) (NYSDEC, 2020) offers the following answer to the question: When is it appropriate to include a discussion of alternative scales or magnitudes of action in an EIS?

Consideration of alternative scales or magnitudes may be reasonable under the following circumstances:

1. Some or all potential impacts of the action can be avoided or reduced by a change in project size,
2. The change in project size does not reduce the project to the point where it will no longer serve its intended function; for example, a communication tower may require a minimum height for effective operation; or
3. The reduction in project size may decrease potential profit but does not make the project infeasible.

Items (1), (2) and (3) are all true for this project: a smaller project will reduce environmental impacts; a facility with fewer fabs will be able to produce tens of thousands of wafers per week; and a smaller project may reduce profits but does not make the project infeasible.

## II. Energy and Energy-Related Climate Impacts:

### 1. The Energy Commitments in the DEIS Are Inconsistent with Those in Micron’s Term Sheet Agreement

There is a significant inconsistency between the commitments made by Micron as reflected in the Term Sheet and the discussion in the DEIS. In September 2022, Micron signed a Term Sheet agreement with Empire State Development, Onondaga County, and OCIDA. According to the Term Sheet, among other agreements, Micron committed to negotiating a Clean Energy and Sustainability Action Plan that will “at minimum” “require Micron to [u]tilize 100% renewable energy for electricity by 2025 in its New York Fab Complex operations, which may include but not necessarily be limited to the use of renewable energy credits, and maintain that renewable energy for electricity supply for the duration of the Term.”<sup>2</sup> The DEIS, by contrast, explains that “Micron would commit to purchasing 100% carbon-free electricity utilizing power purchase agreements and renewable energy credits (RECs).”<sup>3</sup>

The distinction between “renewable” and “carbon-free” is material. Resources that qualify as “renewable” under New York’s Climate Leadership and Community Protection Act are zero emissions.<sup>4</sup> By contrast, resources that are “carbon-free” are not necessarily renewable. Most significantly, while nuclear energy results in no emissions at the point of electric generation, it is neither renewable nor environmentally benign.

If Micron is seeking to modify the Term Sheet to allow supply of electricity from nuclear, the EIS for the project must consider the additional environmental impacts that would entail. Environmental impacts from nuclear energy are laid out in a Red Paper by the Onondaga Nation, Haudenosaunee Environmental Task Force, and American Indian Law Alliance<sup>5</sup> and in comments submitted by the Sierra Club regarding NYSERDA’s Draft Blueprint for Consideration of Advanced Nuclear Technologies.<sup>6</sup> These include the adverse human health and environmental impacts of uranium mining and processing, water consumption, and waste disposal, as well as a range of safety risks. As detailed in the Red Paper, *in-situ* leach mining of uranium has resulted in spills and leaks of contaminated fluids and full clean-up and remediation has proven impossible.<sup>7</sup> Cooling has multiple adverse environmental impacts including massive water withdrawals — an estimated 13.3 million gallons of water per year from Lake Ontario for Nine Mile Point units 1 & 2 and

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<sup>2</sup> Term Sheet ¶ 33(a) (emphasis added).

<sup>3</sup> DEIS at 0-9 (emphasis added).

<sup>4</sup> P.S.L. § 66-p(1)(b) defines renewable to mean solar thermal, photovoltaics, on- and off-shore wind, hydroelectric, geothermal electric, geothermal ground source heat, tidal energy, wave energy, ocean thermal, and fuel cells which do not utilize a fossil fuel resource in the process of generating electricity.

<sup>5</sup> Onondaga Nation, Haudenosaunee Env’tl. Task Force, and Am. Indian Law Alliance, Nuclear Reactors Are Not “Green,” available at <https://drive.google.com/file/d/1WxZiW8Kgv4n15m4zGHmwC2oKSO2NSDXe/view> (hereinafter “Red Paper”).

<sup>6</sup> Comments of the Sierra Club regarding NYSERDA’s Draft Blueprint for Consideration of Advanced Nuclear Technologies (Nov. 7, 2024).

<sup>7</sup> Red Paper at 16-17.

Fitzpatrick<sup>8</sup>—as well as impinging and entraining hundreds of millions of organisms,<sup>9</sup> and discharging heated water into cold water ecosystems, disrupting the ecological balance.<sup>10</sup>

Additionally, if Micron is contemplating nuclear energy to power its chip fabrication facility, it must consider the time frame for nuclear development and interim power needs. The timeline for the only recently completed nuclear reactor in the United States—Plant Vogtle—was 15 years, and NuScale recently terminated its Small Modular Reactor (SMR) project in Utah after nine years despite hundreds of millions in Department of Energy subsidies.<sup>11</sup> Given these protracted development timelines, the EIS must address the interim power supply and the environmental impacts of those generation resources.

## **2. The DEIS Fails to Consider the Project’s Impact on New York’s Attainment of Its Statutory Renewable Energy Mandates, Which Is Not Advanced by Micron’s Proposed Purchase of RECs**

Under the CLCPA, by 2030, a minimum of 70% of the statewide electric generation secured by jurisdictional load serving entities to meet the electrical requirements of end-use customers in New York state “shall be generated by renewable energy systems,”<sup>12</sup> en route to achieving statewide greenhouse gas emission reductions of at least 85% below 1990 levels by 2050.<sup>13</sup> As discussed in the New York Public Service Commission’s order on the Biennial Review of the state’s Clean Energy Standard, New York has a considerable distance to go in achieving the 70% renewable energy by 2030 mandate. As of 2022, renewable and zero emission electric generation comprised only 46.1% of statewide load.<sup>14</sup> The state’s ability to reach 70% renewables has been challenged by a number of factors including global interest rates, inflation, and supply chain pressures, transmission system inadequacies, interconnection delays, changes to capacity accreditation at the New York Independent System Operator, changes in federal incentives, siting complexities, and growing statewide electric load.<sup>15</sup>

Micron represents a massive new electricity demand in New York State and will further impede the state’s efforts to achieve 70% renewable energy by 2030. Total retail electricity sales in 2023 were 139,422 GWh,<sup>16</sup> meaning that Micron’s 15,673 GWh represents 11.2% of New York’s total electricity consumption. Adding a new single electricity

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<sup>8</sup> *Id.* at 35.

<sup>9</sup> *Id.* at 35-36

<sup>10</sup> *Id.* at 36-38.

<sup>11</sup> Timothy Gardner & Manas Mishra, NuScale ends Utah project, in blow to US nuclear power ambitions (Nov. 9, 2023), available at

[https://www.reuters.com/business/energy/nuscale-power-uamps-agree-terminate-nuclear-project-2023-11-08/?fbclid=IwY2xjawFMLjRleHRuA2FibQIxMAABHfNGGVvEPHbzV4UjuCNBcl3yvzc9YYSlsdPS5wumytHVMiHyhqFqr87Nug\\_aem\\_SZrRIFMRXyk6STQQED23MQ](https://www.reuters.com/business/energy/nuscale-power-uamps-agree-terminate-nuclear-project-2023-11-08/?fbclid=IwY2xjawFMLjRleHRuA2FibQIxMAABHfNGGVvEPHbzV4UjuCNBcl3yvzc9YYSlsdPS5wumytHVMiHyhqFqr87Nug_aem_SZrRIFMRXyk6STQQED23MQ).

<sup>12</sup> P.S.L. § 66-p(2)(a).

<sup>13</sup> Env. Conserv. L. § 75-0107(1)(b).

<sup>14</sup> N.Y. P.S.C., Order Adopting Clean Energy Standard Biennial Review as Final and Making Other Findings, Case 15-E-0302 (May 15, 2025), at 7.

<sup>15</sup> *Id.* at 8.

<sup>16</sup> EIA, New York Electricity Profile 2023, <https://www.eia.gov/electricity/state/newyork/>

load that will increase New York electricity consumption by over 11% has significant implications for the achievement of New York's attainment of its climate and clean energy legal mandates that must be considered. Indeed, the state would need to contract for an additional 10,971 GWh of renewable energy—70% of Micron's anticipated 15,673 GWh of demand—to comply with the state's renewable energy mandates. Yet the DEIS fails to discuss or address the environmental impacts of this additional energy development burden.

Micron's proposed use of unbundled RECs to mitigate greenhouse gas emissions from the facility's operations<sup>17</sup> fails to address or ameliorate the facility's adverse impacts on achievement of New York's renewable energy mandates. A Renewable Energy Credit, or REC, is a "market-based instrument that represents the property rights to the environmental, social, and other non-power attributes of renewable electricity generation."<sup>18</sup> Each REC corresponds to the attributes associated with one megawatt-hour (MWh) of electricity that is generated and delivered to the electricity grid from a renewable energy resource.<sup>19</sup> Micron's purchase of RECs, without the accompanying clean energy, does not contribute to New York's achievement of the 70% renewable energy mandate, as it fails to increase statewide electric generation secured by jurisdictional load serving entities.<sup>20</sup> Indeed, based on its commitment, Micron could purchase RECs from out-of-state facilities that have no ability to serve New York load.

But as discussed above, even if Micron purchased bundled RECs from renewable energy resources delivering to New York, to the extent those RECs and energy were from existing renewable energy resources that New York was already counting toward attainment of the 70% renewable energy mandate, the Micron facility would still be exacerbating the state's clean energy challenges, compelling New York to develop yet more renewable energy resources to serve the state's existing load.

### 3. The DEIS Impermissibly Understates Scope 2 Emissions

To calculate Scope 2 (indirect) GHG emissions, the DEIS states that Micron utilized the facility's estimated electricity consumption (15,673.83 GWh) and the applied GHG emission factors to this energy use "based on New York State electrical emission rate factors obtained from USEPA's Emissions and Generation Resource Integrated Database (eGRID)."<sup>21</sup> This approach is flawed. Calculating Scope 2 emissions for a new massive source of load based on eGRID emission rates—which represent the average emissions intensity of the local grid—misstates the emissions impact of adding the Micron facility. Instead, marginal emission rates must be utilized, and produce results that are multiple times higher than Micron estimates.

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<sup>17</sup> DEIS at 0-9.

<sup>18</sup> U.S. EPA, Renewable Energy Certificates (RECs), <https://www.epa.gov/green-power-markets/renewable-energy-certificates-recs>.

<sup>19</sup> *Id.*

<sup>20</sup> See P.S.L. § 66-p(2)(a).

<sup>21</sup> DEIS at 3-203.

As EPA explains on the eGRID Power Profiler, the eGRID emission rates represent “average” emission rates for a subregion<sup>22</sup>—i.e., an emission rate that averages all sources of generation in the subregion that operate at any time. But the Micron facility will not be drawing *average* power from the grid. It is a massive *new* load and therefore will be drawing incremental (marginal) power. Consequently, the emission factor associated with serving the new electric load is that of the *marginal* unit, not that of the average unit, as the New York Public Service Commission recently affirmed.<sup>23</sup>

This distinction is critically important because the Upstate New York (NYUP) subregion has large amounts of hydropower (32.9% of fuel mix) and nuclear energy (32.3% of fuel mix),<sup>24</sup> which dramatically lowers the subregion’s average emissions intensity. But nuclear and hydropower typically operate as baseload resources, dispatching before fossil (gas) units. Gas is routinely the marginal fuel in New York,<sup>25</sup> including when the marginal unit is located in Central New York (Zones B, C, and E), where the Micron facility would be located.<sup>26</sup>

DEIS Table 3.7-11 shows emissions from electricity usage of 2,273,587 metric tons of CO<sub>2</sub>e using a 100-year global warming potential (GWP).<sup>27</sup> Assuming this figure is based on electricity consumption of 15,673.73 GWh, the emissions correspond to an assumed emission rate of 290.1 lb/MWh.<sup>28</sup> Scope 2 GHG emissions based on marginal rather than average emission rates would be multiple times higher than the Micron’s estimates. According to EPA’s 2023 eGRID data, the “nonbaseload” (marginal) CO<sub>2</sub>e emission rate for the Upstate New York region (NYUP) is 911.8 lb/MWh.<sup>29</sup> Replacing Micron’s 290.1 lb/MWh with the eGRID marginal emission rate increases projected CO<sub>2</sub>e Scope 2 emissions from 2,273,587 metric tons per year to 6,484,300 metric tons per year<sup>30</sup>—more than 4 million metric tons per year higher and nearly 3 times greater than Micron estimates.

It bears note these massive Scope 2 emissions are not offset in any material way by the 4 MW of solar panels Micron proposes to install. While Sierra Club is supportive of efforts by Micron to develop solar and other renewable resources to mitigate impacts from the facility, Micron calculates that its 4 MW would offset 503 metric tons/year of CO<sub>2</sub>e,<sup>31</sup>

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<sup>22</sup> EPA Power Profiler, <https://www.epa.gov/egrid/power-profiler#/>

<sup>23</sup> See Order Granting Certificate of Public Convenience and Necessity and Providing for Lightened Regulation, N.Y. Pub. Serv. Comm’n Case No. 21-G-0576 (Nov. 18, 2022) at 36 (explaining that “the relevant emissions factor to apply to incremental loads on the New York electric system is the marginal (as opposed to average) emissions rate”).

<sup>24</sup> EPA Power Profiler, <https://www.epa.gov/egrid/power-profiler#/>

<sup>25</sup> Potomac Economics, 2023 State of the Market Report for the New York ISO Markets (May 2024), at A-8 – A-9, available at

[https://www.potomaceconomics.com/wp-content/uploads/2024/05/NYISO-2023-SOM-Full-Report\\_5-13-2024-Final.pdf](https://www.potomaceconomics.com/wp-content/uploads/2024/05/NYISO-2023-SOM-Full-Report_5-13-2024-Final.pdf)

<sup>26</sup> *Id.* at A-15, Fig. A-8.

<sup>27</sup> 3-205, Tbl. 3.7-11.

<sup>28</sup>  $[2,273,587 \text{ metric tons CO}_2\text{e} * 2,204 \text{ lb/metric ton}] / 15,673,830 \text{ MWh} = 319.7 \text{ lb/MWh}$ .

<sup>29</sup> Data, Tab SRL, Col. DF, Row 17.

<sup>30</sup>  $[15,673,830 \text{ MWh} * 911.8 \text{ lb/MWh}] / [2,204 \text{ lb/metric ton}] = 6,484,300 \text{ metric tons}$ .

<sup>31</sup> DEIS at 3-205 (using 100-year GWP).

which represents 0.0078% of the facility's Scope 2 emissions. As discussed above, while Micron has committed to source its electricity from carbon-free resources, it proposes to allow this to be achieved through the purchase of RECs. But use of unbundled RECs does not ensure that the generation is new or incremental. Consequently, use of marginal emissions is appropriate.

### **III. Failure to Identify Chemicals & Quantities.**

The DEIS needs to include far more details about what chemicals are being used by Micron. New York State has issued regulations specifying the content of an adequate EIS. NYCRR 617.9 (b)(1) states " An EIS must assemble relevant and material facts upon which an agency's decision is to be made. It must analyze the significant adverse impacts and evaluate all reasonable alternatives." The DEIS fails to meet this standard.

The CHIPS and Science Act and the New York GREEN CHIPS Law, at best, should be public-purpose industrial policies that serve a clear public good rather than simply subsidize multinational corporations. To that end, the CHIPS and Science Act includes numerous research, development, and demonstration programs meant to boost public health and reduce environmental impacts in chips manufacturing communities like Onondaga County.

Among these federally-funded research programs are the Perfluoroalkyl and Polyfluoroalkyl Substances Reduction and Innovation in Semiconductor Manufacturing program, administered by the National Semiconductor Technology Center, and the CHIPS AI/AE for Rapid, Industry-informed Sustainable Semiconductor Materials and Processes funding opportunity, which is administered by NIST. These two federally funded programs are meant to track and monitor harmful chemicals across the chips manufacturing process and to identify less harmful chemical substitutes that can be readily adopted by industry to protect communities, workers, and the environment.

By failing to disclose the numerous chemicals—especially the many types of PFAS compounds that will likely be used at the Clay facility, Micron and the overall community will be unable to avail themselves of innovative findings emerging from federal research programs. The federal research programs exist to correct deficiencies in the present chipmaking process. Those deficiencies will persist if Micron and the final EIS fail to acknowledge shortcomings.

Table 3.8-9 lists various hazardous chemicals: flammable gases, pyrophoric gases, corrosives, toxic gases, oxidizers, asphyxiants, flammable liquids, and water reactive substances.<sup>32</sup> (Pyrophoric chemicals spontaneously catch fire when exposed to air.) The DEIS needs to list the identity and quantities of these chemicals to properly define health and safety risks for both workers and the surrounding community. Moreover, the environmental impacts of a sudden release of hazardous chemicals can only be assessed if the identity and quantities of chemicals transported to and stored at the facility are given in the EIS.

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<sup>32</sup> DEIS at 3-242.

The Programmatic Environmental Impact Statement for Modernization and Expansion of Existing Semiconductor Fabrication Facilities offers an example of the level of detail needed in an EIS for a semiconductor fab, whether new or existing.<sup>33</sup> Appendix D of that document includes ten pages listing approximately 200 “representative” chemicals used by the semiconductor industry. All of these are listed under the Toxic Substances Control Act (TSCA). NIST also offers specific information regarding hazardous chemicals used by the chips industry in Table 3.8-2, shown on the next page.<sup>34</sup>

In contrast, the DEIS lists *only* eight chemicals (ammonium hydroxide, anhydrous ammonia, hydrogen, hydrogen chloride, silane, chlorine, dichlorosilane, and HF) which meet the narrow definition of “extremely hazardous substances” above applicable threshold quantities given in 40 C.F.R. § 68.130.<sup>35</sup> Fewer than ten other chemicals are mentioned on pages 3-237 and 3-239. This is completely inadequate for the agencies to analyze the significant adverse impacts. All of the chemicals used by Micron in its manufacturing process must be identified and approximate quantities provided.

Table 3.8-10 illustrates the inadequacy of the chemical information in the DEIS. This table, titled Hazardous Materials, reveals that 13.5 million gallons of “Liquid corrosives” will be stored at each fab.<sup>36</sup> What type of corrosives? Sulfuric acid is a liquid corrosive. So is a solution of ferric chloride. These pose completely different types of risk and environmental impacts. Again, all chemicals used must be identified so that adequate storage and mitigation risks can be identified.

We have the same question for all other categories of chemicals, especially the 94,600 pounds of toxic gases stored at each fab. How toxic are these “toxic gases”? It is well established that the chips industry uses deadly gases like arsine, phosphine and nitrogen trifluoride (see e.g. NIST 2024, Table 3.7-1). The DEIS needs to specify how much of these gases will be stored on site, and how they will be handled, to meet the requirements of NYCRR 617.9 (b)(1).

Table 3.8-2 from Programmatic Environmental Impact Statement for Modernization and Expansion of Existing Semiconductor Fabrication Facilities (NIST 2024)

Table 3.8-2 from Programmatic Environmental Impact Statement for Modernization and Expansion of Existing Semiconductor Fabrication Facilities (NIST 2024)

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<sup>33</sup> “Final programmatic environmental assessment for modernization and expansion of existing semiconductor fabrication facilities under the CHIPS Incentives Program,” United States Department of Commerce, National Institute of Standards and Technology CHIPS Program Office, Washington, D.C., 28 June 2024.

<sup>34</sup> *Id.*, 70.

<sup>35</sup> DEIS at 3-244.

<sup>36</sup> *Id.*, 242.

**Table 3.8-2. Hazardous Process Chemicals Used in Semiconductor Manufacturing**

| Chemical Category                            | Use(s)                                                                                                                                                                                       | Process Chemical                                                                           | Hazard Class                       |
|----------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------|------------------------------------|
| Aqueous solutions (commonly acids and bases) | To wet-etch or clean the surface of the wafer; as part of the photolithography process.                                                                                                      | Hydrochloric acid, HF, sulfuric acid, nitric acid, ammonium hydroxide, potassium hydroxide | 8 Corrosive Material               |
|                                              |                                                                                                                                                                                              | Ammonium fluoride                                                                          | 6.1 Poisonous Materials            |
|                                              |                                                                                                                                                                                              | Hydrogen peroxide                                                                          | 5.1 Oxidizer                       |
| Specialty gases                              | As precursors to deliver a substance such as arsenic or tungsten onto the wafer or into the silicon lattice (used in small quantities); to dry-etch a pattern onto the surface of the wafer. | Silane                                                                                     | 2.1 Flammable Gas                  |
|                                              |                                                                                                                                                                                              | Ammonia, nitrogen trifluoride, sulfur hexafluoride                                         | 2.2 Non-Flammable Compressed Gas   |
|                                              |                                                                                                                                                                                              | Ammonia, phosphine, tungsten hexafluoride, arsine, CO, fluorine, chlorine, diborane        | 2.3 Poisonous Gas                  |
| Organic compounds (commonly solvents)        | As constituents in specialty chemicals; to clean the wafer; as part of the photolithography process.                                                                                         | Isopropanol, xylene, propylene glycol ethers, acetone                                      | 3 Flammable and Combustible Liquid |
| Metallic compounds                           | Applied to the wafer in specific locations to create transistors; to plate wafers to provide electrical connections.                                                                         | Copper sulfate                                                                             | 9 Miscellaneous Hazardous Material |

Sources: ISMI, 2006; 49 C.F.R. Part 172; EPA, 2022a.

#### **IV. Catastrophic impacts due to spill, leak, or equipment failure.**

There is very superficial discussion about spills, accidental releases and system upsets that can result in contamination of building interior spaces, the underlying soil, the groundwater and surface water. It is clear even from the limited information about stored chemicals given in Table 3.8-10 that large quantities of chemicals will be stored at the site. The table lists these categories of hazardous liquids (rounded to nearest 1000 gallons):

- Acidic Solutions: 172,900 gallons/fab x 4 fabs = 692,000 gal
- Caustic Solutions: 82,300 gallons/fab x 4 fabs = 329,000 gal
- Liquid Corrosives: 13.5 million gal/fab x 4 fabs = 52 million gal
- Flammable liquids: 121,900 gallons/fab x 4 fabs = 488,000 gal
- Peroxide: 124,000 gallons/fab x 4 fabs = 496,000 gal

In addition, the DEIS states that the “Micron Campus would have an aggregate aboveground oil or petroleum product storage capacity of approximately 1.55 million gallons, which would store diesel, gasoline, lubricating oil, hydraulic fluid, ...” and several minor types of oils.<sup>37</sup>

Altogether, over 55 million gallons of hazardous liquid chemicals and petroleum products would be stored on site once the four fabs are completed and operational. Of course these chemicals are not simply stored. They must be transported to the site, transferred into storage tanks, or loaded into drum storage space; distributed to manufacturing areas; and dispensed as needed. Wastes need to be collected, containerized, and properly recycled, treated, and/or shipped off-site for disposal.

The DEIS states that groundwater contamination is not an issue during construction, asserting the “Micron would implement a SWPPP and SPCC/SPR [Spill Prevention Control and Countermeasure Plan and Spill Prevention Report] to reduce the risk of accidental releases, leaks, or spills of materials such as concrete, oil, fuel, lubricants, or hydraulic fluids during construction and provide for immediate containment and cleanup of any release.”<sup>38</sup> The same language is applied to operations at the facility: “Micron also would be required to implement SWPPP and SPCC/SPR Plan measures to reduce the risk of accidental releases, leaks, or spills during facility operations and provide for immediate containment and cleanup of any release.”<sup>39</sup> But accidents and spills do not necessarily go according to plan and containment is never “immediate.” The DEIS needs to assess the actual risks of spills, especially given the fact that large quantities of chemicals are being transported to the facility, and large quantities of waste chemicals are being transported away from the facility.

While the quantity of chemicals used is not given in the DEIS, it is possible to estimate it using literature values. Kim *et al.* researched two factories in Korea which produce memory chips (NAND and DRAM), the same product that Micron will make in its Clay facility. They calculated chemical usage rates of 4.26 and 8.3 ton/year per employee. Micron aims to employ approximately 9000 workers when all four fabs are operating. Applying the published factors, we estimate between 38,000 and 75,000 tons of chemicals will be delivered to the Micron facility per year, once the four-fab complex is fully operational in 2041. This means that, roughly, 100 - 200 tons of chemicals are delivered to the facility every day, 365 days/year.<sup>40</sup>

The DEIS indicates that “Chemicals would be delivered to the Micron Campus by truck ... using a variety of packaging and containment methods, including tanks, drums, and pallets... Micron would contract with carriers and shippers of hazardous materials that maintain 24/7 emergency response support in the event of hazardous materials spills...”<sup>41</sup> Trucks will be travelling on highways, competing with construction vehicles, employee vehicles, delivery vehicles, and vehicles of Clay and Cicero residents. The risk of accidents on

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<sup>37</sup> Id., 242, 244.

<sup>38</sup> Id., 3-80.

<sup>39</sup> Id., 3-86.

<sup>40</sup> Kim, J. C. Yoon, S. Ham *et al.* (2018) “Chemical use in the semiconductor manufacturing industry” *INT’L J. OF OCCUPATIONAL AND ENVIRONMENTAL HEALTH*. VOL. 24, NOS. 3-4, 109-118

<sup>41</sup> Id., 3-243

these congested roadways is relatively high. We raise serious concerns about the response time for a chemical spill. How long would it take for a national chemical carrier to respond to an accident involving a spill? What kinds of spills are they equipped to handle? These concerns, which are central to the evaluation of environmental risks, do not appear to be addressed in the DEIS.

Micron can substantially reduce risks to human health and the environment by shipping the bulk of its chemical supplies by rail. It does not appear that this mitigation of spill risk has been considered, even though the DEIS recognizes the superior safety of rail transport: “Freight rail accidents occur at a much lower rate than truck accidents (3.6 versus 11 fatalities per 10 billion ton-miles), freight rail-related non-fatal accidents are one-fifth that of truck accidents, and rail accidents that cause property damage are 62 times less frequent compared to truck accidents (OneRail, 2016).”<sup>42</sup>

The DEIS recognizes the susceptibility of the local groundwater to contamination in Section 4. CUMULATIVE EFFECTS. On p. 4-16 it states: “It can be assumed that planned residential, industrial, and transportation development, along with the implementation of the Proposed Action and Connected Actions could reasonably ...[lead to] the increased risk of groundwater exposure to pollutants from spills or leaks, or from contaminated stormwater runoff.” The DEIS notes further that “surficial aquifers are *highly permeable* and could become contaminated from overlying *spills, leaks, or infiltration*, and *carbonate aquifers can transport groundwater long distances through solution openings, potentially transporting contamination on a regional scale*. Ultimately, depending on the severity of potential groundwater exposure to contaminants, *impacts could be significant and widespread.*” (emphasis added)

But the DEIS does not address, in any substantive way, the potential for spills, leaks and infiltration from the operations at the Micron facility to contaminate the local groundwater, and for that groundwater to transport contaminants long distances. Fox Professional Geology PLLC (2025) asserts in comments submitted regarding this Proposed Action that “The Micron Campus is located directly over a highly productive karst bedrock aquifer.” Fox observes that “The presence of karst features on, beneath, and near the Micron Campus, including closed circular depressions and solution-enlarged joints and fracture zones, requires careful and thorough consideration, evaluation, planning, and monitoring to facilitate protection of human health, built structures, water quality, and the environment.” We agree with Jon Fox that this level of analysis has been regrettably omitted from the DEIS, and that it needs to be incorporated.

## **V. Per- and polyfluorinated Alkyl Substances (PFASs)**

### **A) Types of PFAS Used in the Semiconductor Industry**

Per- and polyfluoroalkyl substances (PFAS) constitute a large class of over 15,000 fluorinated chemicals that have gained notoriety due to their persistence, their ability to accumulate in the bodies of human beings and wildlife, and their toxicity. The DEIS language

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<sup>42</sup> DEIS at p. 3-255

on PFAS “forever chemicals” is vague and general, providing no information about the types of PFAS to be used and/or discharged from the facility. In contrast the CHIPS Program Office in its 2024 *Final Programmatic Environmental Assessment for the Modernization and Expansion of Existing Semiconductor Fabrication Facilities* contains considerable detail about the use of PFAS in wafer fabrication. Appendix C of that document includes a 10-page table listing the numerous types of PFAS used by the semiconductor industry.<sup>43</sup> The DEIS must be revised to include far greater detail about the types and quantities of PFAS used in the Micron fabs.

Regulation of PFAS has not kept pace nor caught up to the reality that hundreds of types of PFAS are employed in modern chips manufacturing. Most regulations are focused on just two types of PFAS: perfluorooctanoic acid (PFOA) and perfluorooctane sulfonate (PFOS). The state of New York and USEPA have issued drinking water standards only for these two types of PFAS.<sup>44</sup> NY state has also issued drinking water quality guidelines for only PFOA and PFOS.<sup>45</sup>

However, these types of PFAS are no longer used by the chips industry. As noted in the CHIPS PEA (2024; p. C-15), “Long-chain PFAS compounds, such as PFOS, have been replaced by short-chain PFAS. Another long-chain PFAS, PFOA, was phased out in the United States by 2015 and is projected to be eliminated globally by 2025 (EPA, 2022; WSC, 2023).”

The DEIS (p. 3-240) says Micron will request “detailed chemical constituent documentation from its chemical vendors, including PFAS content, which often requires the use of non-disclosure agreements to obtain such information.” Non-disclosure is not acceptable - and we would argue is even unlawful. The public has a right to know the identity of hazardous substances used and released in their communities. The DEIS needs to specify how much of these highly toxic chemicals will be stored on site, and how they will be handled, to meet the requirements of NYCRR 617.9 (b)(1).

## B) Measurement and Treatment of PFAS in Wastewater

Wastewater generated at Micron’s facility will be treated in a pre-treatment system on the Micron campus, and portions thereof sent to a specialized facility owned and operated by Onondaga County: “Industrial wastewater generated on the Micron Campus that is not treated at the campus for reuse would be sent as secondary residual wastewater via the wastewater conveyance to the Industrial Waste Water Treatment Plant (IWWTP) at the Oak Orchard Site. For compliance with ECL Article 17 (6 NYCRR Part 750), the IWWTP would be required to obtain an individual SPDES permit issued by NYSDEC to permit

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<sup>43</sup> “Final programmatic environmental assessment for modernization and expansion of existing semiconductor fabrication facilities under the CHIPS Incentives Program,” United States Department of Commerce, National Institute of Standards and Technology CHIPS Program Office, Washington, D.C., 28 June 2024.

<sup>44</sup> NYS Dept of Health.(2024) Water Supplier Fact Sheet - New MCLs  
[https://www.health.ny.gov/environmental/water/drinking/docs/water\\_supplier\\_fact\\_sheet\\_new\\_mcls.pdf](https://www.health.ny.gov/environmental/water/drinking/docs/water_supplier_fact_sheet_new_mcls.pdf)

<sup>45</sup> NYS Dept of Environ. Conservation (2023):  
[https://extapps.dec.ny.gov/docs/water\\_pdf/togs111addendum2023.pdf](https://extapps.dec.ny.gov/docs/water_pdf/togs111addendum2023.pdf)

discharge of treated industrial wastewater into surface waters associated with the Oneida River.”<sup>46</sup>

The DEIS acknowledges that the wastewater sent to the IWWTP will contain PFAS, since the “IWWTP also would include technologies specifically designed to remove emerging contaminants, such as per- and polyfluoroalkyl substances (PFAS), including reverse osmosis and nanofiltration ...granular activated carbon ..., ion exchange resins ... and advanced oxidation processes.... To comply with its SPDES permit for the IWWTP, OCDWEP would be required to perform regular analytical testing of surface water and effluent samples collected using NYSDEC-approved methods and would be subject to ongoing sampling, monitoring, and reporting requirements.”<sup>47</sup>

The DEIS claims that “Based on these measures, industrial wastewater discharges from operation of the IWWTP would not be anticipated to result in significant adverse effects on water resources outside the mixing zone.”

This claim is false for several reasons. First, NYSDEC-approved analytical methods, namely USEPA draft Method 1633, only measures 40 types of PFAS. Research conducted at Cornell University and elsewhere demonstrates that wastewater created by semiconductor manufacturing will contain hundreds of different types of PFAS. Of these, a fraction can be identified using sophisticated analytical techniques such as homologous series detection and the total oxidizable precursor (TOP) assay. The remainder are “dark” or “non-target” PFAS which can constitute a significant fraction of the total mass of PFAS in the wastewater.<sup>48</sup>

Dr. Helbling explained the significance of the “non-target” PFAS in a presentation given at the Healthy Water Solutions conference on May 16, 2024 (Helbling 2024).<sup>49</sup> His research group analyzed wastewater from three full-scale operating semiconductor manufacturers across the U.S. using standard analytical methods, supplemented with techniques to estimate non-targeted PFAS concentration. In the slide, shown below, a large fraction of the total PFAS concentration in the wastewater could not be accounted for using standard methods. In the facility identified as “fab1,” 42% of total PFAS in the effluent (“fab1\_down”) was identifiable. In fab3, 17% of total PFAS in the effluent (“fab2\_down”) was identifiable. In fab2, only 0.5% of the total PFAS (78,700 ng/L) in the wastewater effluent could be identified. As explained in the research paper, fab1 discharges wastewater to a stream and fab2 and fab3 discharge wastewater to publicly owned treatment works. This

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<sup>46</sup> DEIS at p. 3-83.

<sup>47</sup> Id.

<sup>48</sup> Jacob, P; K. Barzen-Hanson; and D. Helbling, “Target and Nontarget Analysis of Per- and Polyfluoroalkyl Substances in Wastewater from Electronics Fabrication Facilities,” *Environmental Science & Technology*, February 16, 2021, p. 2346. <https://pubs.acs.org/doi/10.1021/acs.est.0c06690>; Qiao, Biting; Hao Chen; Dongbao Song; Bo Fang; Yue Zhou; Yiming Yao; and Hongwen Sun. *Environ. Science & Technol.* 2025 59 (23), 11829-11841. <https://pubs.acs.org/DOI:10.1021/acs.est.5c02035>.

<sup>49</sup> Helbling, Damian (2024) “Target and non-target analysis of per- and poly-fluoroalkyl substances (PFASs) in industrial wastewater.” Presented at the New York Center of Excellence in Healthy Water Solutions Annual Conference, SUNY-ESF, Syracuse, NY. May 16, 2024

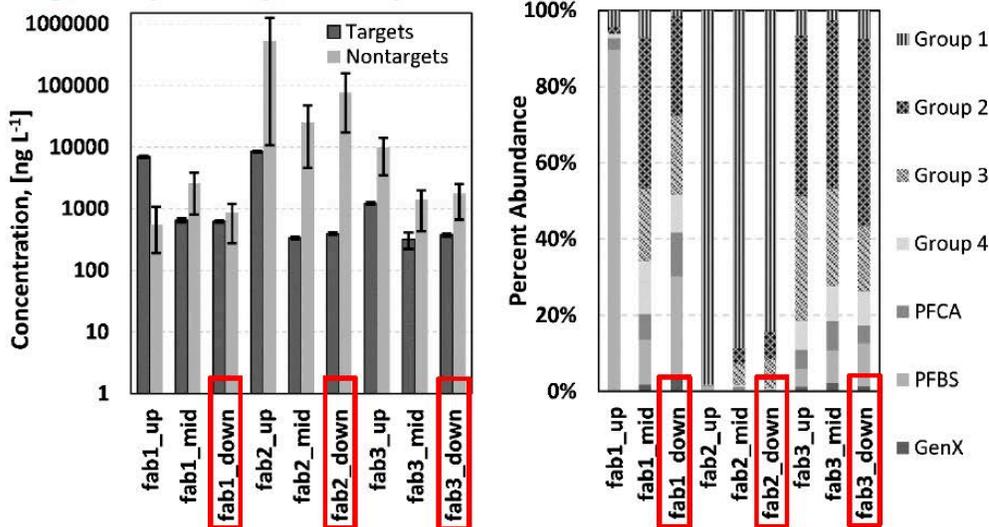
illustrates the inability of conventional analysis, using available chemical standards, to quantify the amount of PFAS in the wastewater discharged from the chips industry.

Given the lack of adequate monitoring of PFAS compounds for Micron’s manufacturing processes, the DEIS must be modified to acknowledge that the environmental impact of PFAS discharges from the facility could very well be significant. As a mitigation measure, we recommend that Micron test its wastewater using a combination of analytical methods which include the whole range of PFAS. Such methods could include TOPS and total adsorbable fluorine and/or total fluorine.

Second, the claim that, by treating the wastewater, that there will be no “significant



### Sum concentrations of nontarget PFAS at point-of-discharge are higher (as expected)



|                      |                  |                   |                  |
|----------------------|------------------|-------------------|------------------|
| <b>PFBS:</b>         | <b>401 ng/L</b>  | <b>116 ng/L</b>   | <b>243 ng/L</b>  |
| <b>∑target PFAS:</b> | <b>623 ng/L</b>  | <b>394 ng/L</b>   | <b>376 ng/L</b>  |
| <b>∑all PFAS:</b>    | <b>1490 ng/L</b> | <b>78700 ng/L</b> | <b>2170 ng/L</b> |

adverse effects on water resources outside the mixing zone” is based on the false assumption that dilution of PFAS will eliminate their ill effects. Nothing could be further from the truth. PFAS are called “forever chemicals” because they do not break down in the environment. PFAS are known to bioaccumulate in humans, animals, and in some cases, plants.<sup>50</sup> The

<sup>50</sup> ITRC Per- and Polyfluoroalkyl Substances Team (Dec. 2023) notes that “Biomonitoring studies across a variety of organisms, habitats, and geographies show that certain PFAS can accumulate in wildlife and that exposures are occurring on a global scale.”

CHIPS PEA states that “Wastewater discharge from semiconductor fabrication facilities presents a substantial risk for PFAS contamination of the environment.”<sup>51</sup>

The treated wastewater will be discharged to the Oneida River, which merges with the Seneca River to become the Oswego River, which discharges into Lake Ontario. The Onondaga County Water Authority, along with many other water suppliers around this great lake, draws its water supply from Lake Ontario. PFAS which is discharged in Micron’s treated wastewater will eventually contaminate Lake Ontario and potentially the OCWA drinking water supply.

The CHIPS PEA explains that “most facilities send 100 percent of TARC [Top Anti-Reflective Coating] waste to industrial wastewater drains, unless segregated in a separate drain and collection system for disposal.”<sup>52</sup> TARCs currently account for over 50 percent of total PFAS used in photolithographic processes worldwide and thus contribute a large portion of the PFAS found in wastewater discharges.

Micron’s approach to PFAS treatment is also discussed on DEIS page 3-241: “Early evaluations suggest that the most effective wastewater treatment solution for the Proposed Project will involve installation of PFAS segregation technology targeted to the relevant process wastewater streams. Micron’s final design will include wastewater treatment for regulated PFAS-containing wastewater that meets current regulatory requirements under New York and Federal law prior to discharge to the IWWTP.”

We concur with Micron’s plan to segregate their process wastewater streams which contain PFAS. However, to mitigate the serious environmental harms created by discharges of PFAS via wastewater, Micron needs to do more than “meet current regulatory requirements.” As explained above, current regulatory requirements are **not protective of the environment** because they do not address the hundreds of persistent and toxic PFAS found in the semiconductor industry’s wastewater. Micron needs to install at its pre-treatment plant or have installed at the Onondaga County industrial WW treatment plant, state-of-the art treatment technology which completely eliminates the entire range of PFAS compounds. An example of such technology is reverse osmosis, followed by treatment of the concentrated reject stream using advanced oxidation or surface plasma treatment. Removal and destruction of PFAS must be confirmed using sophisticated analytical techniques which are capable of detecting the wide range of PFAS compounds which may be present.

The DEIS states “Micron would dispose of or otherwise manage waste known to contain regulated PFAS in accordance with applicable regulations and as appropriate given its content and characteristics.”<sup>53</sup> Again, current regulatory requirements are **not protective of the environment because:**

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<sup>51</sup> “Final programmatic environmental assessment for modernization and expansion of existing semiconductor fabrication facilities under the CHIPS Incentives Program,” p. C-15, United States Department of Commerce, National Institute of Standards and Technology CHIPS Program Office, Washington, D.C., 28 June 2024.

<sup>52</sup> Id.

<sup>53</sup> DEIS at p. 3-241.

- There are no categorical limits for PFASs in wastewater discharged by the semiconductor industry
- NYSDEC water quality standards exist only for PFOA and PFOS, ignoring the hundreds of other PFAS compounds commonly found in semiconductor wastewater
- The USEPA has not set water quality standards for any type of PFAS.
- Analytical methods which has been adopted by USEPA, NYSDOH, and NYSDEC fail to quantify the majority of PFAS compounds found in **semiconductor wastewater**

## VI. Commercial Solid Wastes

It is anticipated that the Micron facility would generate substantial amounts of Commercial Solid Waste and wastes that could be potentially recycled. The waste quantities are summarized in Table 3.9-4, shown below:

| Material                                      | Disposal Method <sup>82</sup>                                            | Fab 1  | Fabs 1-2 | Fabs 1-3 | Fabs 1-4 |
|-----------------------------------------------|--------------------------------------------------------------------------|--------|----------|----------|----------|
| <b>Solid Waste</b>                            |                                                                          |        |          |          |          |
| Industrial waste (tpy)                        | Private hauler transport to private industrial waste disposal facilities | 800    | 1,300    | 1,800    | 2,300    |
| Commercial MSW (tpy)                          | Private hauler transport to municipally owned waste disposal facilities  | 15,800 | 25,000   | 34,300   | 43,500   |
| General MSW (tpy)                             | Private hauler transport to municipally owned waste disposal facilities  | N/A    | N/A      | N/A      | N/A      |
| RMW (30-gallon bins per year) <sup>83</sup>   | Private hauler transport to RMW disposal facilities                      | 11     | 22       | 34       | 45       |
| <b>Reusable or Recyclable Material</b>        |                                                                          |        |          |          |          |
| Micron RRR or other recyclable material (tpy) | (See Table 3.8-5 below)                                                  | 32,200 | 51,100   | 70,000   | 88,800   |

The Commercial Solid Waste is characterized as “metals, drums and cylinders, E-waste, batteries, plastic, foam, cardboard, scrap wood, office supplies, etc.” The DEIS goes on to say that: “The non-RRR portions of this commercial MSW would be collected via licensed commercial haulers for transport to municipally owned waste disposal facilities within the OCRRA service area ... The commercial MSW would be transported first to the

WTE Facility, capacity permitting, to maximize energy recovery. Overflow amounts would be sent to the RCR Transfer Station, which could receive up to 800 tons per day.”<sup>54</sup>

According to Table 3.8-5 Metals, drums and cylinders, E-waste, batteries, scrap wood, office supplies, plastic, foam are all designated for recycling. However, the ability to recycle plastics and foam—especially when contaminated—is limited. The Onondaga County Resource Recovery Agency currently accepts a limited selection of solid plastic items for recycling and does not accept foam or film plastics.<sup>55</sup>

**The DEIS needs to define more fully what is in the non-recyclable commercial waste.** This is a critical question because a large portion of the commercial SW is to be burned at OCRRA’s WTE plant. The semiconductor industry is highly reliant on PFTE, PFA and other fluoropolymers. (The CEO of chemical manufacturer Chemours claimed “We estimate that in a modern-day fab, there’s a half-kilo of PFA in every square foot. So in a 400,000- to 600,000-square-foot fab, that’s 200 to 300 metric tons of this stuff.”)<sup>56</sup> Fluorinated materials such as PFTE (Teflon™) and PFA will not fully break down when burned, leading to emission of hazardous products of incomplete combustion, as well as hydrofluoric acid (HF), an extremely corrosive and toxic substance.

**To mitigate air pollution impacts, Micron should segregate all waste materials made with fluoropolymers and not allow them to be incinerated. It would be best to find a way to recycle this material.**

## **VII. Wastewater sludge**

A significant environmental impact of the Micron project stems from the creation of various wastewater treatment solid by-products, commonly called “sludge.” Sludge is a type of solid waste which must be considered per NYCRR 317 (b)(3)(5) item f. “impacts of the proposed action on solid waste management and its consistency with the state or locally adopted solid waste management plan.” The DEIS fails to adequately address the management of wastewater sludge created at the Micron facility and, as a related effect, at Onondaga County’s Oak Orchard treatment facility.

There are three sources of wastewater sludge as shown in the diagram below:

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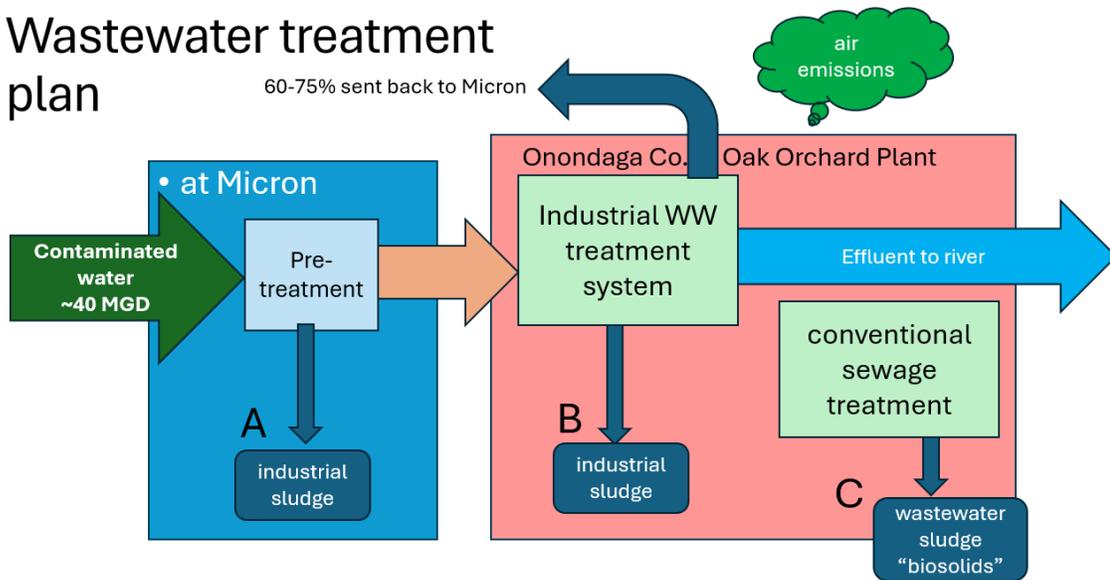
<sup>54</sup> DEIS at p. 3-233.

<sup>55</sup> see current guidelines at [https://ocrra.org/wp-content/uploads/2024/03/Recycling\\_101\\_Web.pdf](https://ocrra.org/wp-content/uploads/2024/03/Recycling_101_Web.pdf)

<sup>56</sup> Feldman, Amy (2023) *More Domestic Chip-Making Means More ‘Forever Chemicals.’* Forbes magazine. Oct 05, 2023.

[www.forbes.com/sites/amyfeldman/2023/10/05/more-domestic-chip-making-means-more-forever-chemicals/?sh=2d10b08c7821](https://www.forbes.com/sites/amyfeldman/2023/10/05/more-domestic-chip-making-means-more-forever-chemicals/?sh=2d10b08c7821).

## Wastewater treatment plan



The EIS needs to address the three sources of sludge labeled in the diagram: A, B and C. For each sludge source, the EIS should:

- Estimate the quantity generated
- Provide a description of the anticipated characteristics of the sludge, such as water content, organic content, and anticipated concentrations of contaminants
- Identify how the sludge will be disposed of, or, if not known at the time, likely options.

Sludges A and B are entirely due to Micron’s operations, while the volume of sludge C will be increased due to induced growth. We offer these comments on Sludges A and B.

### Sludge A.

**What quantity of sludge is estimated to be generated? How much water will it contain? The environmental impacts of sludge disposal or beneficial use depend greatly on the quantity of sludge generated.** A previous draft of the DEIS (from March 2025) stated that, upon full buildout, the facility would generate “88,800 tons of RRR materials annually. Approximately 24 percent of this RRR volume would consist of recyclables (21,100 tons per year). The majority of the remaining RRR volume is anticipated to consist of [wastewater pre-treatment] sludge and metals.” Based on that, over 67,000 tons of sludge and metals would be generated per year.

These important details were removed from the draft released for public comment. They should be re-inserted.

Table 3.8-5 Industrial and Commercial Materials for Micron RRR Program shows that “Non-hazardous sludge from on-site wastewater treatment” will be disposed of by “Send[ing] to [a] beneficial use vendor or recycle.” Is this sludge being generated from the four Biological Wastewater Treatment Facility described in DEIS Table 2.1-3 (DEIS, p. 2-13)? **What substances are anticipated to be in this sludge?** Wastewater from the semiconductor manufacturing process is likely to be contaminated with a wide variety of substances, including:

- heavy metals
- fluorides
- PFAS
- Resins and specialty organics
- microplastics, and
- polycyclic aromatic hydrocarbons.

No explanation is given as to how this sludge could be beneficially re-used or recycled. What is the feasibility of actually re-using this sludge? Where would it go? What are the environmental consequences? Will it be tested for hazardous substances to determine whether or not it should be classified as hazardous waste? If PFAS compounds are present, how will the sludge be managed so that it does not contaminate soils, surface water, plants, wildlife and groundwater with PFAS?

Appendix K-12 provides an example recycling program from the Micron facility in Boise, Idaho. That does not describe or even list a sludge re-use/recycling program.

### **Sludge B.**

We were unable to find any estimate of the quantity of sludge to be generated from the IWWTP in the DEIS released for public comment. However, the March version of the DEIS (Section 3) stated “operation of the IWWTP would generate an industrial waste stream from [sic] zero liquid discharge solids of approximately 109,500 wet tons/year.” Again, an estimate of sludge volume should be provided in the Final EIS. Without this it is not possible to meaningfully assess its environmental impact. Likewise, the EIS needs to assess disposal options for this material, based on likely composition and levels of contaminants. It seems likely that this material would be contaminated with PFAS, heavy metals, and potentially other recalcitrant substances associated with semiconductor manufacturing. Disposal options should be described.

## **VIII. Hazardous Waste**

It is reported in **Table 3.8-6** that the Micron facility would initially generate 18,300 ton/yr of hazardous waste (Fab 1 in operation), ranging up to 50,300 ton/year with four fabs in operation. The sentence at the bottom of p. 2-236 states that “As shown in Table 3.8-7,

hazardous waste would consist mainly of acidic and solvent waste volumes.” Table 3.8-7 shows volumes of unspecified “acidic waste” and unspecified “solvent waste” generated per fab. To convert these volumes to tonnages requires the densities of the waste. We assumed a density of water (1.00 g/ml) for the acidic waste and a density of 0.785 g/ml, which is representative of acetone and isopropyl alcohol, for the solvent waste. Applying these numbers, the total amount of acidic and solvent waste generated = 8,750 tons per year per fab. This accounts for less than half of the 18,300 ton/yr total waste estimated per fab in **Table 3.8-6**.

**Table 3.8-8** provides a bit more detail about types of waste generated, but no quantities or specific identities are reported.

**The types and quantities of hazardous waste should be specified. What specific solvents are in the solvent waste? What acids are in the acidic waste? What chemical waste accounts for the missing 9,500 tons/year of hazardous wastes estimated for each fab?**

**Hazardous wastes, by their nature, pose a threat to the health and safety of workers and the surrounding community. Unintentional releases of chemical wastes can have devastating effects on the environment as well. For example the derailment of train cars carrying vinyl chloride, phosgene, and other chemicals in Palestine, Ohio on February 3, 2023 forced the evacuation of thousands of residents and contaminated air, water and soils.**

On p.3-239 the DEIS says: “Micron plans to explore the distillation of isopropyl alcohol and ammonia solutions to reduce waste and to increase potential for valuable reuse off-site. Other material streams such as bulk solvent, drummed solvent, and contaminated debris would be reused or recovered through fuel blending or energy recovery at approved permitted cement kilns that allow kilns to run on waste-derived fuel.”

Certain waste streams such as lab waste, cylinders, expired materials, glues, resins, a subset of solvents, and certain acids would likely need to be incinerated at permitted off-site disposal facilities in other states.

**Micron is to be commended for maximizing the reuse and recycling of IPA, and ammonia. The final EIS should provide greater detail about the quantities of the various waste streams slated to be incinerated by Veolia.**

## **IX. Effects of chemical waste and other transport on traffic volumes**

As noted in the preceding sections, a substantial quantity of chemicals will be delivered to the facility by truck, and substantial quantities of wastes destined for landfills,

recycling, and incineration will be hauled away from the facility. Presumably these will also be transported by truck. While we were admittedly limited by the tight timeframe given to review the 20,000-page DEIS, we have not found any accounting of the traffic volume created by these delivery vehicles. The traffic caused by trucks is described in DEIS, Appendix M, Vol. Transportation and Traffic. A total of 64 trucks entering and leaving the facility each day is projected throughout the construction phase: 2027–2041. An additional 5 - 20 trucks/day leaving and entering is anticipated as operations ramp up from 2031–2044.<sup>57</sup>

As discussed in the preceding comments, trucks are being utilized to transport:

- 1) between 100 and 200 tons of chemicals per day. A wide variety of chemicals need to be delivered, ranging from small gas cylinders to large bulk tankers.
- 2) Approximately 170 ton/day of municipal solid waste, 5 day/week
- 3) Approximately 80 ton/day of various recyclable materials, 5 day/week
- 4) Approximately 260 ton/day of wastewater sludge , 5 day/week
- 5) Approximately 195 ton/day of hazardous wastes , 5 day/week

Considering all of the above, it appears that the DEIS has substantially underestimated the traffic caused by truck deliveries related to operations of the Micron fabs.

## **X. Air pollution**

### **A) NAAQS and Hazardous Air Pollutants**

The DEIS asserts that air pollution emissions from the construction and the operation of the Micron facility will not violate the National Ambient Air Quality Standards (NAAQS) for the study area. However, most of the monitoring data for criteria air pollutants (those with established NAAQS) on which this assessment relies comes from monitors in Rochester, NY, more than 70 miles from the project site. Only ozone and small diameter particulate matter (PM<sub>2.5</sub>) are measured in the Syracuse area. Conditions in Rochester may be expected to be similar, but Micron should at least be required to demonstrate—with actual local monitoring data—that they are before relying on these figures to demonstrate that the facility will not have any significant environmental impacts.

In addition, in making this assessment, the DEIS does not allow for or consider the impacts of any exceedances, upsets, or violations in assessing the environmental impacts of air emissions. However, no equipment works perfectly. Again, based on its experience in chip manufacturing, Micron should have some sense of how often its facilities encounter upsets, exceedances, or unavoidable permit violations that may result in excess air emissions. If Micron doesn't have that data, it could rely on industry-wide statistics. For example, the Environmental Working Group found that, as of October 25, 2024, 10% of active semiconductor manufacturing facilities had violated federal environmental laws and

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<sup>57</sup> DEIS Appendix M at 2-10, 2-11.

regulations in the last 10 years and 27% of the facilities with individual discharge permits had violated those permits.<sup>58</sup>

Finally, assuming that the DEIS NAAQS compliance analysis is correct, modeled levels of both NO<sub>x</sub> and PM<sub>2.5</sub> are very close to NAAQS limits (see Table 3.6-10 NAAQS Results).<sup>59</sup> Modeled results for the hazardous pollutants HF, NF<sub>3</sub>, and total fluorides, shown in Table 3.6-11) are very close to annual guideline concentrations (AGC) established in NYSDEC Division of Air Resources guidance DAR-1.<sup>60</sup> Given the uncertainty inherent in modeling data, and the lack of local background monitoring data, **Micron should be required to install air quality monitors for NAAQS pollutants and selected hazardous air pollutants (including HF, NF<sub>3</sub>, and total fluorides) in the airshed directly affected by the Micron facility. The data from those monitors could be used to both check NAAQS compliance under regular operating conditions and to identify the environmental impacts of exceedances, upsets, or other unavoidable violations of air emission limits.** Micron can then modify its operations or improve emission controls if the localized air monitoring shows exceedances.

#### B) Incineration of perfluorinated compounds (PFCs) and related gases

In the section on Greenhouse Gas emissions, the DEIS notes that “Semiconductor manufacturers use a variety of high GWP [global warming potential] gases to create circuitry patterns on silicon wafers along with chillers for certain process tools to prevent overheating. Examples of widely used high GWP fluorinated compounds (F-gases) including PFCs (e.g., CF<sub>4</sub>, C<sub>2</sub>F<sub>6</sub>, C<sub>3</sub>F<sub>8</sub>, and c-C<sub>4</sub>F<sub>8</sub>), HFCs (CHF<sub>3</sub>, CH<sub>3</sub>F and CH<sub>2</sub>F<sub>2</sub>), NF<sub>3</sub>, and SF<sub>6</sub>. Semiconductor manufacturing processes also use fluorinated heat transfer fluids and N<sub>2</sub>O.”<sup>61</sup>

Micron plans to incinerate its process gases: “GHGs from the Proposed Project would be emitted as a result of using fluorinated GHGs, N<sub>2</sub>O, CH<sub>4</sub>, and CO<sub>2</sub> as raw materials in manufacturing processes, from oxidation of organic compounds in thermal oxidation systems and RCTOs (Rotary Concentrator Thermal Oxidizers), from the combustion of natural gas and diesel, and from leaks of HTF (Heat Transfer Fluid).” “Thermal oxidation systems and RCTOs would combust natural gas, and byproducts of combustion would exhaust alongside other unreacted process GHG emissions.”<sup>62</sup> The DEIS projects that Micron will release 2.48 tons/year of “fluorides” emissions from fabs 1 and 2 alone.<sup>63</sup> The source of fluorides is not described, but is likely from the incineration of F-gases.

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<sup>58</sup> Environmental Working Group (2024, Oct. 25), “What the Building CHIPS America Act Could Mean for Public Health and the Environment,”

[www.ewg.org/news-insights/news/2024/10/what-building-chips-america-act-could-mean-public-health-and-environment](http://www.ewg.org/news-insights/news/2024/10/what-building-chips-america-act-could-mean-public-health-and-environment).

<sup>59</sup> DEIS at 3-168.

<sup>60</sup> NYSDEC Div. of Air Resources. Guidelines for the Evaluation and Control of Ambient Air Contaminants Under 6NYCRR Part 212. Available at

[chrome-extension://efaidnbnmnibpcjpcglclefindmkaj/https://extapps.dec.ny.gov/docs/air\\_pdf/dar1.pdf](chrome-extension://efaidnbnmnibpcjpcglclefindmkaj/https://extapps.dec.ny.gov/docs/air_pdf/dar1.pdf)

<sup>61</sup> Id., 3-188.

<sup>62</sup> Id.

<sup>63</sup> Id., 3-165, 3-183.

The problem with incineration is two-fold: it is not 100% effective; some compounds are only reduced about 60%. According the Environmental Assessment for the Micron fab in Boise, ID: “Micron Boise currently estimates that its POU [Point of Use] abatement systems achieve DRE [Destruction and Removal Efficiency] factors between 60 and 98 percent based on the individual chemical and the ability of the POU abatement system to control each species of process gas.”<sup>64</sup> Thus, a significant fraction of some gases escape into the atmosphere despite passing through thermal oxidation and wet scrubbing.

The other problem is that incineration produces toxic products of incomplete combustion, and hydrogen fluoride (HF), which is highly toxic and highly corrosive. This is discussed at length by Weitz et al (2024).<sup>65</sup> The authors conclude that “ Few studies have been conducted at full-scale operating facilities, and none to date have attempted to characterize possible fluorinated organic products of incomplete combustion (PICs). Further, the ability of existing air pollution control (APC) systems, designed primarily for particulate and acid gas control, to reduce PFAS air emissions has not been determined.”

They recommend “Further research is needed to examine the formation and measurement of PICs in full-scale treatment facilities.”. The emission of products of incomplete combustion, which are themselves types of PFAS, is completely overlooked in the DEIS. These hazardous chemicals are not being monitored, and are not regulated under the Clean Air Act or through NYS regulations. Micron must commit to either stop using fluorinated gases—replace them with nontoxic degradable compounds—or use a superior technology to isolate and destroy them.

This is why the Department of Defense moved away from incinerating PFAS firefighting foam. The PICs are not regulated. They are not even monitored. So we have the situation where toxic gases of unknown composition are being emitted into our community. What are the health effects?

Shields *et al* researched the incineration of PFAS in firefighting foams. They concluded that “many PFAS can be converted to other PFAS at low temperatures resulting in high DEs without full mineralization and the potential release of the remaining fluorocarbon portions [smaller molecules] to the environment. Many of these products of incomplete combustion

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<sup>64</sup> Draft Environmental Assessment for Micron ID1, Boise, Idaho. NIST-CPO/EA-004, CHIPS Program Office, National Institute of Standards and Technology, U.S. Department of Commerce, July 10, 2024.

<sup>65</sup> Weitz, K. et al (2024) Review of per- and poly-fluoroalkyl treatment in combustion-based thermal waste systems in the United States, *Science of the Total Environment* 932 (2024) 172658: <https://www.sciencedirect.com/science/article/abs/pii/S0048969724028055#:~:text=Available%20results%20suggest%20the%20temperature,concentrations%20in%20facility%20air%20emissions.>

(PICs) are greenhouse gases, most have unknown toxicity, and some can react to create new perfluorocarboxylic acids.”

SEQR, 6 NYCRR 617.9 (b)(6), makes a special requirement where serious but undefined effects are likely:

**“if information about reasonably foreseeable catastrophic impacts to the environment is unavailable because the cost to obtain it is exorbitant, or the means to obtain it are unknown, or there is uncertainty about its validity, and such information is essential to an agency's SEQR findings, the EIS must:**

- (i) identify the nature and relevance of unavailable or uncertain information;
- (ii) provide a summary of existing credible scientific evidence, if available; and
- (iii) assess the likelihood of occurrence, even if the probability of occurrence is low, and the consequences of the potential impact, using theoretical approaches or research methods generally accepted in the scientific community.

If Micron is unable or unwilling to eliminate the incineration of F-gases from its process, then the EIS must fulfil the requirements of 617.9 (b)(6) with respect to the potentially catastrophic effects of releasing toxic F-gases and related products of incomplete combustion into the atmosphere.

We recommend that Micron explore an alternative approach to controlling F-gases: low-temperature condensation of the gases, followed by destruction using advanced technology such as super critical wet oxidation.<sup>66</sup>

## **XI. Addressing the Wetland Concerns at the Site**

**Micron is obligated to adhere to the new NYS Freshwater Wetlands regulations.** Micron’s current determination of impacted New York State jurisdictional wetlands and the company’s obligation to comply with the new state freshwater regulations remains unclear. Starting In 2021, Micron employed Ramboll Americas Engineering Solutions, Inc. (Ramboll) to further identify wetlands types and acreages that should be included under the ACOE and New York state’s permitting authority. The results of this research are found in a series of tables, charts, and maps in the DEIS that largely reflect information from old DEC jurisdictional paper maps confirmed by surveys. (Based on determinations issued by NYSDEC under ECL Article 24, approved Jurisdictional Determinations issued by USACE

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<sup>66</sup> See USEPA report at [https://cfpub.epa.gov/si/si\\_public\\_record\\_Report.cfm?dirEntryId=357639&Lab=CESER](https://cfpub.epa.gov/si/si_public_record_Report.cfm?dirEntryId=357639&Lab=CESER)

under the Clean Water Act, and what Ramboll describes as non-jurisdictional wetlands ‘definitively excluded from Federal and State jurisdiction’)

The DEIS does not, however, indicate the criteria for how Ramboll decided what wetlands would not receive permitting protection. The DEIS acknowledges the wetlands permitting reforms passed by the NYS Legislature in 2022 and the subsequent regulations for freshwater wetlands that went into effect January 1, 2025.<sup>67</sup> But it remains unclear whether Micron is operating under the old rules or the new rules when both the applicant and DEC decide which wetlands deserve permitting protection.

Under the old rules, State Jurisdictional wetlands were wetlands found on approved maps that are 12.4 acres or larger. If a wetland never made it on a map, its destruction did not require a state permit. The new law and regulations require a permit for any wetland, regardless of whether it is on an approved State map or if it is larger than 12.4 acres (7.4 acres after 2028) or is a wetland of any size that possesses local importance from a specific list of criteria (wetlands that attenuate significant flooding, filter drinking water, provide habitat for rare species, are located in an urban area).

According to the DEIS, the Micron Campus was field evaluated for the potential presence of wetlands regulated by the Federal government and the State of New York by Ramboll biologists in the fall of 2021, summer of 2022, and the spring, summer, and fall of 2023. Site visits were also conducted in the spring, summer, and fall of 2023 and the spring of 2024 with USACE Buffalo District and NYSDEC Region 7 personnel to observe, verify, and supplement the delineations conducted by Ramboll.<sup>68</sup> But if some of the delineation happened before the Freshwater wetlands legislative reforms were enacted in 2022 and all of the delineations and site advisories happened before the language of the final regulations and the revised wetlands classification system was made public in December of 2024, it is unclear how such data collection and analysis could reflect the demands of the new law. The DEIS makes no mention of capturing smaller wetlands of ‘unusual importance’ in the field surveys or the attempt to identify vernal pools, two central considerations of wetland delineation under the new rules. The DEIS cites the Department of Environmental Conservation staff signing off on certain Micron jurisdictional determinations in February 2024, while others are still pending in 2025. It would be wholly inappropriate to create a wetlands protection / mitigation plan for the entire Micron complex with some of the impacted landscape shielded from protection by the weaknesses of the old law, while other habitat areas (though at this point the minority of the acreage) held to the standards of the more protective laws.

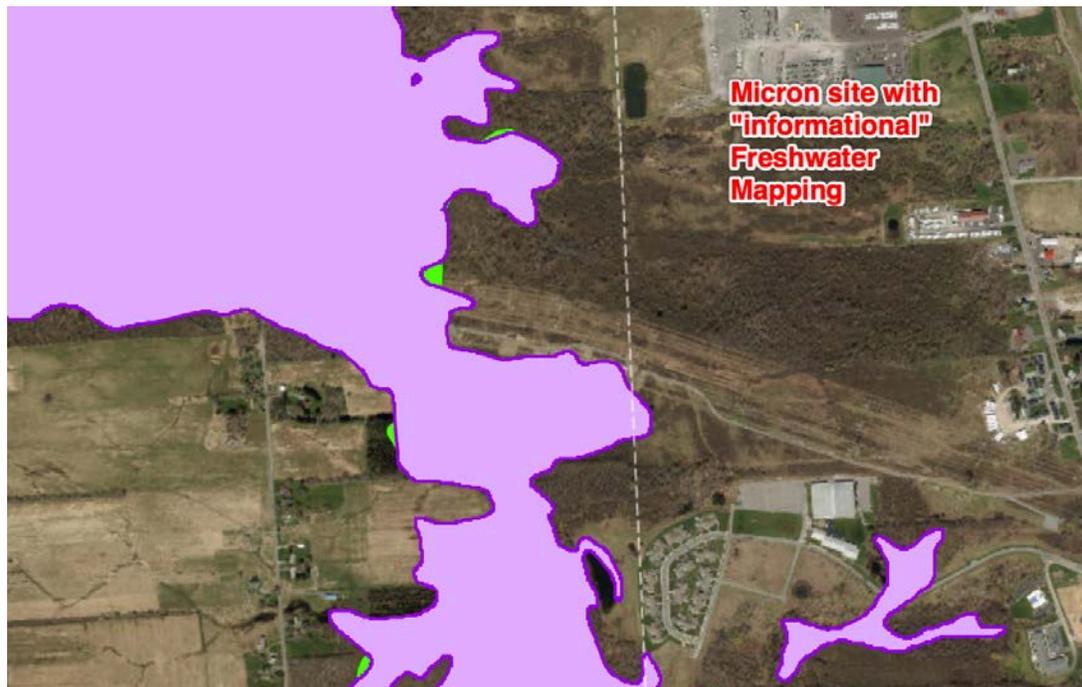
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<sup>67</sup> DEIS Appendix F at F-8.

<sup>68</sup> DEIS Appendix F Vol. 1 Part 1.



The DEIS suggests that State Jurisdictional determinations were based upon the adherence to historic wetlands delineations as depicted in green. (source: DEC Environmental tracker)



The wetlands in purple depict “informational wetlands” where DEC predictive mapping identifies potential locations for jurisdictional wetlands, beyond what was originally mapped.

Ramboll, however, did compile in the DEIS tables, lists and maps of wetlands deemed “non jurisdictional” presumably because these habitats were not on official maps or did not

meet the ACOE test of having a significant nexus to the 'Waters of the United States'. But again, without understanding the rules by which Ramboll conducted its assessment, it is unclear whether it captured every wetland within the development zone under the 2025 regulations or if its count was constrained by outdated standards. In sum, the entire Micron project will allegedly result in the permanent loss of approximately 193.38 acres of federal jurisdictional wetlands, which overlap with approximately 174.77 acres of State jurisdictional wetlands.

The applicant acknowledges approximately 10.5 acres of impacted non-jurisdictional wetlands and will compensate for their loss in consideration of mitigation, which equates to a sum total of approximately 210 wetlands acres. But with State jurisdictional wetlands come protective 100 ft buffers and it is unclear whether these collective 35 acres (not considered NY state jurisdictional wetlands) will be treated with the more protective buffers or suffer the standards of the outdated rules.

The publicly subsidized Micron proposal has projected that it will be a beacon of modernity that will uplift New Yorkers as much as it will advance a new age of technological innovation. But Micron cannot fulfill its obligation to the public good if it gives short-shrift to the environmental review process by shielding its wetlands obligations from the new law.

Micron and DEC must make clear through the EIS process that this project does not qualify for exemptions from the new freshwater regulations that went into effect January 1, 2025.

#### **Wetlands mitigation measures**

The DEIS notes that the construction of the facility will require excavating over 1.6 million cubic yards (2.70 to 3.67 million total tons) of soil and muck from the existing wetlands and fields at the WPCP. This material is designated for "beneficial reuse."<sup>69</sup>

**Micron should coordinate with the Wetlands Trust and other experts in wetlands to see whether this material which is rich in wetland plant seeds, spores, and microorganisms could be utilized to create new wetlands as part of the wetlands mitigation plan. This would minimize long-distance transport of this huge amount of material, and could accelerate the establishment of new wetlands.**

**A revised plan for wetlands protection must include:**

- a declaratory statement that the Micron project will comply with the NYS wetlands regulations that went into effect January 1st, 2025.

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<sup>69</sup> DEIS at 3-223 et seq.

- a comprehensive analysis of all wetlands on the project site, regardless of size. For a publicly subsidized and forward-thinking project like Micron that will be engaged in construction well past 2028, all wetlands larger than 7.4 acres should be considered state jurisdictional and come with the commensurate buffers, protections and mitigations associated with their permitting.
- a review of Wetlands smaller than 7.4 acres to determine if they meet the criteria for ‘Local Importance’ and deserving of permitting protections. In consideration of the potential for endangered species on the Micron property, it is conceivable that many of the smaller wetlands would qualify as state jurisdictional wetlands.
- a revised wetlands mitigation plan that truly addresses the indirect and cumulative impacts of the project by increasing the wetland replacement ratio from about 2:1 to ~10-15:1, as was done for the Seneca Meadows wetlands restoration project (see <https://res.us/projects/seneca-meadows-wetland-restoration-design-build-mitigation-for-landfill-impacts-to-wetlands/>).
- a better integration of mitigation land acquisition to accommodate the more than 600 acres of endangered species habitat with acreage acquired to mitigate wetlands loss.

## **XII. Climate and Pollution Impacts Embodied in Construction Materials**

### **1. The DEIS Inadequately Reviews the Project’s Scope 3 Emissions and Embedded Pollution Impacts**

The proposed construction project will significantly increase GHG emissions, yet the DEIS incorrectly states that these impacts are not “reasonably foreseeable” and insufficiently discloses GHG emissions and air pollutants from construction materials, known as Scope 3 greenhouse gas emissions.<sup>70</sup> This makes it impossible to adequately assess the risks the project poses to the climate and to upstream industrial communities. By failing to address embodied emissions of construction materials, the DEIS excludes the impact of GHG emissions and air pollutants from the complete lifecycle of the project.

The emissions associated with construction of the fabrication facilities and the overall campus will be significant, as cement and steel manufacturing alone remain among the highest emitting industries in the world, contributing about 16% of anthropogenic climate-warming emissions.<sup>71</sup> Information on the magnitude and product categories of the fabrication facilities’ steel, cement, and asphalt needs are largely absent from the DEIS, as is information on how Micron and its contractors plan to source and procure these materials. Failing to disclose the GHG emissions associated with construction of the facility, including the embodied emissions of carbon-intensive materials, significantly impairs the ability of the

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<sup>70</sup> DEIS at 3-200.

<sup>71</sup> Columbia Energy Exchange, “Decarbonizing Steel and Cement,” Columbia University Center on Global Energy Policy, Aug. 8 2023, [www.energypolicy.columbia.edu/decarbonizing-steel-and-cement/](http://www.energypolicy.columbia.edu/decarbonizing-steel-and-cement/).

lead, involved, participating, and cooperating agencies with stakes in the project, the well-being of affected regions, and carrying out NEPA and SEQRA from determining if this project is in the public interest, let alone if it is adequately mitigating impacts.

*Coming Clean on Industrial Emissions*, a report commissioned by Sierra Club and developed by Synapse Energy Economics in Cambridge, Massachusetts, identifies a wide range of emissions and toxic pollutants released by domestic producers of steel and cement, which have serious implications for the upstream impacts of this project. For example, integrated mills producing steel products have Scope 1 and 2 emissions intensities ranging from 0.39 to 2.35 metric tons of carbon dioxide equivalent per metric ton of steel produced. Despite more clustering in the cement sector, the gap between the best and worst performing facilities is equally stark: the best performing cement facility emits 0.21 metric tons of CO<sub>2</sub>e per metric ton of cement produced, while the greatest laggard emits 1.45 metric tons of CO<sub>2</sub>e per metric ton of cement produced. Secondary steel made in electric arc furnaces has a similar noteworthy gap between best and worst performers with the most carbon-intensive minimill emitting 1.38 metric tons of CO<sub>2</sub>e per metric ton produced and the least intensive emitting 0.22 metric tons of CO<sub>2</sub>e per metric ton produced.<sup>72</sup> Due to the significant emissions-intensity disparities in the incumbent market, disclosure of sourcing information and product specifications are critical to understand this project's upstream impacts.

The environmental and public health impacts of steel and cement operations are immense and heterogenous. For example, the domestic iron and steel industry releases 39 chemicals on land, 51 into water, and 77 into the air. The domestic cement industry releases 26 chemicals on land, 17 into water, and 139 into the air.<sup>73</sup> And, while *Coming Clean* uses a variety of methods to capture the climate emissions and fence-line pollution of these facilities, additional pollutants created by electric-generating units powering them is not depicted. Without additional information on sourcing, product specifications and cleanliness verification, the array of impacts, including on New York manufacturing communities, will remain unknown.

The absolute volume of cement and steel necessary to complete the 1,377-acre site is staggering. The DEIS assesses that the five million square feet of factory space for fabrication facilities alone involves millions of tons of steel and other construction materials.<sup>74</sup> Reporting from June 2024 tallied the concrete needs as six times greater than used to build the Pentagon. The steel needs were said to be four times more than those of

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<sup>72</sup> Synapse Energy Economics, "Coming Clean on Industrial Emissions" Report Database, Prepared for the Sierra Club, Sep. 12, 2023, [https://docs.google.com/spreadsheets/d/1oVevRe4KdmO6iK83R\\_-jE-JpAnoZEOAE/edit?gid=1490092082#gid=1490092082](https://docs.google.com/spreadsheets/d/1oVevRe4KdmO6iK83R_-jE-JpAnoZEOAE/edit?gid=1490092082#gid=1490092082).

<sup>73</sup> Id. at 32, [www.sierraclub.org/sites/default/files/2023-09/Coming-Clean-On-Industrial-Emissions.pdf](http://www.sierraclub.org/sites/default/files/2023-09/Coming-Clean-On-Industrial-Emissions.pdf).

<sup>74</sup> DEIS at 0-18.

the Golden Gate Bridge, per a Micron Executive Vice President's comment to then-President Joe Biden on the undertaking's scale.<sup>75</sup> According to a 2019 presentation by Exyte, a builder of fabs tapped by Micron to be the construction manager of its Boise, Idaho expansion, material needs of a generic fab are 520,000 cubic meters of concrete and 73,000 metric tons of steel rebar. Across four fabs, as is Micron's intention for its New York project, this figures to two million cubic meters of concrete and 300,000 metric tons of steel rebar.<sup>76</sup> The DEIS should provide estimates for the quantities of the carbon-intensive materials to be used to further underpin its analysis. Failure to disclose this information is a serious omission. The knowledge gap inappropriately forces agencies with legal obligations to assess and report on impacts to rely on news articles, corporate-officer soundbites, and possibly outdated estimates that are not specific to the project in question. However, failure to include this non-specific information in the DEIS suggests that involved agencies did not carry out even a haphazard appraisal of these impacts.

## **2. The DEIS Does not Discuss the Nexus between Scope 3 Emissions and State Laws, Executive Orders, Regulations, and Project Terms**

In the discussion of state and local laws pertinent to the DEIS, the Agencies should incorporate requirements for green building materials covered under the New York Green CHIPS Law and Executive Order 22.<sup>77</sup> The New York Green CHIPS Law and the term sheet between the New York State Urban Development Corporation, Onondaga County, and Micron requires Micron to "encourage contractors to...incorporate low-carbon building materials (green steel, green cement, etc) into construction."<sup>78</sup> Micron's Green Chips Sustainability Plan, hitherto not made public, further would require discussion of "incorporating regional low-carbon building materials (green steel, green cement, mass timber, etc.) into construction."<sup>79</sup> Executive Order 22 requires the accounting and reduction of embodied carbon in construction materials, verified through the submission of environmental product declarations, across affected agencies including New York State Urban Development Corporation.<sup>80</sup> Doing business as Empire State Development, the Urban Development Corporation leads the Green CHIPS Program, has committed \$5.5 billion in incentives to Micron, and has signed the aforementioned term sheet. For Micron to receive

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<sup>75</sup> Glenn Coin, "Micron's Concrete Dilemma: Building the Vast Complex in Clay Conflicts with Green Promises," Syracuse.com, June 13, 2024, <https://www.syracuse.com/business/2024/06/microns-concrete-dilemma-building-the-vast-complex-in-clay-conflicts-with-green-promises.html>

<sup>76</sup> Herbert Blaschitz, "Creating Sustainable Wafer Fabs for the Future," Exyte, November 2019.

<sup>77</sup> DEIS at 3-59.

<sup>78</sup> Term Sheet ¶ 33(l); "Micron's Green CHIPS Sustainability Requirements," Empire State Development, <https://esd.ny.gov/micron-green-chips-sustainability-requirements>.

<sup>79</sup> Green CHIPS Sustainability Plan Template, Empire State Development, [https://esd.ny.gov/sites/default/files/Green-CHIPS-Sustainability-Plan-Template\\_0.pdf](https://esd.ny.gov/sites/default/files/Green-CHIPS-Sustainability-Plan-Template_0.pdf).

<sup>80</sup> New York State Executive Order No. 22, "Leading by Example: Directing State Agencies To Adopt a Sustainability and Decarbonization Program," Governor Kathy Hochul, Sep. 20, 2022.

its substantial state subsidy and proceed in partnership with Empire State Development and the County, it must complete the Sustainability Plan, which Empire State Development must then approve. The plan must be submitted such that there is “...sufficient time to review sustainability options under consideration during various aspects of the project from design, construction, and operation, but before final decisions are made on such options.”<sup>81</sup> The DEIS should disclose Micron’s plans to comply with the state and local policies, as well as how it may harness existing state capacity, benchmarks, and industry standards to guide its procurement of materials and their embodied emissions.<sup>82</sup>

Whatever steel and cement facilities Micron and its contractors choose, there will be impacts. Clear preferences for low-emissions steel and cement or a requirement for materials below a certain emissions threshold, if communicated to contractors and signaled to producers, could mitigate environmental and public health burdens and create a large market to sustain new low-carbon cement and steel production.

With the cement and steel industries using low-carbon labeling and environmental product declarations, and New York Executive Order 22 paving the way for this work, it is reasonable and within the nexus of the project impacts and the law’s remit for Micron to transparently report effects, mitigation plans, and opportunities.<sup>83</sup> Further, as stated earlier, it is well within the province of NEPA and SEQRA to consider foreseeable direct and indirect impacts as well as cumulative impacts. This has long been understood as part of the obligation of review.<sup>84</sup> Transparency and review is critical in this instance due to the scale and duration of the project and because the effects are not necessarily indirect and distant.

Production to outfit the Micron construction has clear emissions, pollution, and jobs impacts. For example, the Nucor Steel Auburn facility is several miles from the project site, and is known for producing steel with a lower carbon footprint relative to several competitors. A preference for lower emissions steel may drive demand to the facility over dirtier competitors elsewhere in the country, or incentivize the facility to reduce emissions further through investments like new clean electricity or further partnerships with

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<sup>81</sup> “New York State’s Green CHIPS Program: Attracting Semiconductor Partnerships To Create Jobs, Opportunity, and Foster Environmental Sustainability,” Empire State Development, <https://esd.ny.gov/green-chips>; Green CHIPS Sustainability Plan Template.

<sup>82</sup> “NYS Buy Clean Concrete Guidelines,” New York State Office of General Services, <https://ogs.ny.gov/nys-buy-clean-concrete-guidelines-0>.

<sup>83</sup> “Environmental Product Declarations,” National Ready Mixed Concrete Association, <https://www.nrmca.org/association-resources/sustainability/environmental-product-declarations/>; “Environmental Certifications,” Nucor, <https://nucor.com/certifications>; “Compliance and Certification,” Cleveland Cliffs, [www.clevelandcliffs.com/doing-business/product-compliance](http://www.clevelandcliffs.com/doing-business/product-compliance); “Sublime Systems Receives Life Cycle Assessment Validating its Electrified Cement Manufacturing Process Enables > 90% Greenhouse Gas Emissions Reduction,” Sublime Systems, Oct. 26, 2023, <https://sublime-systems.com/sublime-systems-receives-life-cycle-assessment-validating-its-electrified-cement-manufacturing-process-enables-90-greenhouse-gas-emissions-reduction/>.

<sup>84</sup> See *Ctr. for Biological Diversity v. Salazar*, 695 F.3d 893, 916-17 (9th Cir. 2012); *Robertson v. Methow Valley Citizens Council*, 490 U.S. 332, 350 (1989).

innovators in New York.<sup>85</sup> Holcim’s Ravena cement plant south of Albany, a significant regional polluter, may pollute more if outfitting the Micron campus. However, if induced by Micron’s purchasing preferences, Holcim may choose to introduce pollution controls and novel technologies, such as Sublime Systems’ zero-carbon process, to transform the facility and reduce cumulative burdens across the Capital Region depending on Micron’s commitment or lack thereof to material cleanliness. Holcim is a Sublime Systems investor, and Holcim has also launched carbon capture projects to continue conventional production but reduce burdens.<sup>86</sup> The Micron project is of such a scale and decadal timeline that it is not unreasonable that new and shuttered material producers alike may stay open and reopen, respectively, to service its needs. This may include the closed Lehigh Cement Company facility in Glen Falls, NY, which was, until recently, a significant polluter north of Saratoga Springs.<sup>87</sup> Producing these materials includes additional upstream impacts, such as mining and transporting limestone, and midstream impacts, such as using heavy duty vehicles to transport materials to the project site. Adequate review must consider not only direct impacts but also the project’s indirect and cumulative impacts.

Given the scale of the proposed facility, Micron’s demand for these products will likely increase greenhouse gas emissions and toxic air and water releases harmful to populations in proximity to steel and cement production. However, by requiring that materials used represent at least half the embodied emission-intensity of existing regional averages upon the start of the project, by preferencing near-zero-emissions materials through the life of the project, and by joining sustainable materials buying platforms to verify its intention to use clean materials brought to market, Micron can mitigate impacts, encourage building material manufacturers to make capital investments and process changes that lower emissions, reduce pollution, benefit public health, and magnify economic benefits of the Micron project both in and beyond Onondaga County.<sup>88</sup>

### 3. The DEIS Does not Establish Mitigatory Scope 3 Emission Reductions

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<sup>85</sup> “Coming Clean on Industrial Emissions”; Jeff St. John, “Electra Lands \$186M to Scale up Its Clean Iron Electrowinning Process,” Canary Media, Apr. 4, 2025, [www.canarymedia.com/articles/green-steel/electra-clean-iron-investment-electrowinning](http://www.canarymedia.com/articles/green-steel/electra-clean-iron-investment-electrowinning).

<sup>86</sup> Press Release: “Holcim Invests in Sublime Systems to Scale up Innovative Low-Carbon Technology, Holcim , Sep. 19, 2024, [www.holcim.com/media/company-news/investment-sublime-systems-low-carbon-technology](http://www.holcim.com/media/company-news/investment-sublime-systems-low-carbon-technology); Aiden Green, “Concrete Change: Holcim Launches €400 Million OLYMPUS Project for Near-Zero Cement,” CarbonCredits.com, Jun. 2, 2025, <https://carboncredits.com/holcim-launches-olympus-project-for-near-zero-cement-carbon-emission/>.

<sup>87</sup> “Coming Clean on Industrial Emissions” Interactive Map, [https://static.sierraclub.org/resources/data-viz/living-economy/industrial-emissions.html?\\_gl=1\\*\\_1oxkejl\\*\\_gcl\\_a u\\*ODE3MDIzMjk0LjE3NTAxOTIyMTk\\*\\_ga\\*NjA4ODg3MzcyLjE2OTQ0NjQ4Njg\\*\\_ga\\_41DQ5KQCWV\\*czE3NTQ4NTU0MDMkbzI5OCRnMSR0MTc1NDg1NTQ2OSRqNjAkBDaKaDA](https://static.sierraclub.org/resources/data-viz/living-economy/industrial-emissions.html?_gl=1*_1oxkejl*_gcl_a u*ODE3MDIzMjk0LjE3NTAxOTIyMTk*_ga*NjA4ODg3MzcyLjE2OTQ0NjQ4Njg*_ga_41DQ5KQCWV*czE3NTQ4NTU0MDMkbzI5OCRnMSR0MTc1NDg1NTQ2OSRqNjAkBDaKaDA).

<sup>88</sup> “NYS Buy Clean Concrete Guidelines,” New York State Office of General Services, <https://ogs.ny.gov/nys-buy-clean-concrete-guidelines-0>; Sustainable Steel Buyers Platform, Rocky Mountain Institute, <https://rmi.org/our-work/climate-aligned-industries/sustainable-steel-buyers-platform/>.

The goal of reducing emissions by half is readily achievable now with existing technologies and projections within the industry indicate significantly greater reductions during the coming decade as the Micron plant is being built. The construction of the first two fabs should require at least a 50% reduction in scope 3 emissions associated with concrete. The construction of the first two fabs should require at least a 25% reduction in scope 3 emissions associated with primary and secondary steel, reflecting an increment of performance improvement across the primary and secondary sectors.<sup>89</sup>

Micron is geographically well-positioned to make, and benefit from, a near-zero-emissions preference for its building materials for the first and second fab today, which should ratchet up to a zero-emissions requirement upon the start of construction of the third and fourth fabs. The nation's leading near-zero-carbon cement and steel operations are in the region. Sublime Systems' Holyoke, Massachusetts commercial plant will be one of only two open cement facilities in the Syracuse area. It is already buoyed by a major order from Microsoft. The Holyoke site is well-placed to outfit the Micron fabs, and Sublime Systems is looking to build larger scale facilities, which may include the Syracuse region if Micron were to commit to purchase or, at least preference, zero-carbon products.<sup>90</sup> Likewise, Boston Metal's Woburn, Massachusetts zero-emission steel demonstration plant will be deployed in 2026.<sup>91</sup> Micron's preferencing of low- or zero-carbon steel would validate its commercial production. However, in addition to not expressing the carbon-intensity of materials to be used, the DEIS fails to evaluate the robustness of the secondary steel market and if primary steel will be needed to contend with possible scrap shortages, particularly as international trade vicissitudes influence market conditions each day. This oversight makes it impossible to assess if needs will be met by recyclers or if primary steelmakers will fill the gap. The different emissions and toxic-pollution profiles of the ironmaking and recycled steel pathways would vastly alter the scale of the project's cumulative upstream impacts. Clearly signaling a low- or zero-carbon steel preference to each industry, along with the possible size of the ultimate purchase, could greatly reduce these impacts. Without transparency and without an embodied-emissions use or procurement target, it is impossible to evaluate impacts and there is little reason to presume that steelmakers or recyclers would have reason to adopt mitigations or invest in transformative innovations.

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<sup>89</sup> "Fundamentals for GHG Emissions Accounting and Classification," Responsible Steel, Jun. 18, 2025, [https://cdn.prod.website-files.com/6538e481169ed7220c330f0a/68527ad1aaa734900c03734e\\_8dd447149c1c385c1c651a95d3a21d65\\_ResponsibleSteel%20Fundamentals%20for%20GHG%20Emissions%20Accounting%20%26%20Classification%20-%20Clean%20-%20V1.0.pdf](https://cdn.prod.website-files.com/6538e481169ed7220c330f0a/68527ad1aaa734900c03734e_8dd447149c1c385c1c651a95d3a21d65_ResponsibleSteel%20Fundamentals%20for%20GHG%20Emissions%20Accounting%20%26%20Classification%20-%20Clean%20-%20V1.0.pdf).

<sup>90</sup> Violet George, "Microsoft and Sublime Sign Deal to Scale Clean Cement, Carbon Herald, May 26, 2025, <https://carbonherald.com/microsoft-and-sublime-systems-sign-deal-to-scale-clean-cement/>.

<sup>91</sup> Press Release: "Boston Metal plans first demonstration plant in 2026 in Woburn, Massachusetts, with molten oxide electrolysis industrial cell technology; company aims to offer an efficient and scalable approach for zero-emission, clean steelmaking," Globe Newswire at Industry Intelligence Inc., Mar. 14, 2025, [www.industryintel.com/news/boston-metal-plans-first-demonstration-plant-in-2026-in-woburn-massachusetts-with-molten-oxide-electrolysis-industrial-cell-technology-company-aims-to-offer-an-efficient-and-scalable-approach-for-zero-emission-clean-steelmaking-169086533784](http://www.industryintel.com/news/boston-metal-plans-first-demonstration-plant-in-2026-in-woburn-massachusetts-with-molten-oxide-electrolysis-industrial-cell-technology-company-aims-to-offer-an-efficient-and-scalable-approach-for-zero-emission-clean-steelmaking-169086533784).

Despite the DEIS's failure to adequately report on construction material needs, the pollution-profiles of materials that will be procured, and what facilities may be able to service the demand, Appendix J does acknowledge that pollution controls adopted by incumbent steel and cement producers can be employed to reduce emissions. For example, carbon capture and storage options used at steel and cement facilities are acknowledged as an option to mitigate emissions from those plants. While the technology is largely deemed infeasible to mitigate Micron's vast scope 1 emissions, no discussion is extended to the preferencing of low-carbon materials to lower the facilities' scope 3 emissions. Pollution controls incorporated at steel, cement, and additional facilities to promote the efficiency of gas boilers are considered elsewhere in Appendix J, too.<sup>92</sup> Yet again, the DEIS does not consider whether Micron's construction needs would incentivize producers making use of sound pollution controls or where pollution may increase or have reason to decrease, on an absolute or emissions-intensity basis, as facilities compete to outfit the Micron campus.

There is ample opportunity for Micron to demand low-carbon and low-pollution construction materials. There is law and regulation either promoting or requiring use of low-carbon materials and disclosure and verification of carbon-intensities. Unfortunately, across thousands of pages, the DEIS sheds no light on this subject. Without information on its steel and cement needs and sourcing plans, environmental and public health burdens in steel and cement manufacturing communities in New York and across the region are sure to increase. As it stands, the DEIS provides insufficient disclosure and analysis to determine the impact on the climate, the environment, public health, and jobs from the construction materials involved in the building process.

Additional analysis is paramount to fulfill legal obligations, to mitigate impacts, and to evidence economic, environmental, public health, and jobs impacts and benefits across the region. This analysis must assess the impacts of the project if using construction materials of national and regional average emissions- and pollution-intensities, the impacts of the project if using low-pollution and low-emissions materials already on the market, and the impacts of— and prospects for—the project if it were to commit to preferencing the use of near-zero pollution and emissions materials, including those being demonstrated in the region.

### **Conclusion:**

As stated earlier, we are grateful for the Federal and State DEIS processes that have allowed the opportunity for public comment and feedback on this massive project. **However, with only 46 days to provide public comment on this vast DEIS, our submitted comments - while extensive - hit on only a fraction of the many issues surrounding the severity and scale of the Micron project.**

**We reiterate that there are several areas where the Sierra Club believes the DEIS did not provide enough information on the subject matter discussed. Additionally, the DEIS**

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<sup>92</sup> DEIS Appendix J, 75-79.

is lacking in areas where the mitigation measures are not strong enough to address the impacts to the environment in which they will be disruptive. And we will state again, it is well within the province of NEPA and SEQR to consider foreseeable direct and indirect impacts as well as cumulative impacts: all parts of the obligation of review.

For all of the reasons outlined above, we urge CPO and OCIDA to lead by example at this facility and to demonstrate to the larger semiconductor industry that there is room to create a model for 21st century solutions. We are hoping that with our comments on the DEIS, we can help in addressing concerns now, and are not dealing with mass clean ups and mitigating contamination 10- 20 years in the future.

Thank you for the opportunity to provide comment on the Micron DEIS.

Sincerely,

A handwritten signature in cursive script, appearing to read "Kate Bartholomew".

Kate Bartholomew  
Chair  
Sierra Club Atlantic Chapter

cc:

David Frenkel, CPO  
Lynelle McKay, CPO  
Robert Petrovich, OCIDA  
Amanda Lefton, NYSDEC

## Appendices

The following references are attached as pdf documents, to be included in the administrative record, and for the convenience of the comment reviewers. Other cited documents are accessible online.

Feldman, Amy (2023) *More Domestic Chip-Making Means More 'Forever Chemicals.'* Forbes magazine. Oct 05, 2023.

<https://www.forbes.com/sites/amyfeldman/2023/10/05/more-domestic-chip-making-mean-s-more-forever-chemicals/?sh=2d10b08c7821>

Helbling, Damian (2024) "Target and non-target analysis of per- and poly-fluoroalkyl substances (PFASs) in industrial wastewater." Presented at the New York Center of Excellence in Healthy Water Solutions Annual Conference, SUNY-ESF, Syracuse, NY. May 16, 2024

Jacob, P; K. Barzen-Hanson; and D. Helbling, "Target and Nontarget Analysis of Per- and Polyfluoroalkyl Substances in Wastewater from Electronics Fabrication Facilities," *Environmental Science & Technology*, February 16, 2021, p. 2346. With supplemental materials. <https://pubs.acs.org/doi/10.1021/acs.est.0c06690>

Kim, J. C. Yoon, S. Ham *et al.* (2018) "Chemical use in the semiconductor manufacturing industry" *INT'L J. OF OCCUPATIONAL AND ENVIRONMENTAL HEALTH*. VOL. 24, NOS. 3-4, 109-118

NIST (2024). Draft Environmental Assessment for Micron ID1, Boise, Idaho. NIST-CPO/EA-004. CHIPS Program Office, National Institute of Standards and Technology, U.S. Department of Commerce. Dates July 10, 2024.

Qiao,Biting; Hao Chen; Dongbao Song; Bo Fang; Yue Zhou; Yiming Yao; and Hongwen Sun. *Environ. Science & Technol.* 2025 59 (23), 11829-11841. <https://pubs.acs.org/DOI:10.1021/acs.est.5c02035>

Shields,E. *et al.* (2023) Pilot-Scale Thermal Destruction of Per- and Polyfluoroalkyl Substances in a Legacy Aqueous Film Forming Foam. *ACS ES&T Engineering* 2023 3 (9), 1308-1317. DOI: 10.1021/acsestengg.3c00098

Weitz, K. et al (2024) Review of per- and poly-fluoroalkyl treatment in combustion-based thermal waste systems in the United States, *Science of the Total Environment* 932 (2024) 172658: <https://www.sciencedirect.com/science/article/abs/pii/S0048969724028055#:~:text=Available%20results%20suggest%20the%20temperature.concentrations%20in%20facility%20air%20emissions.>

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**From:** Kate Fiorello <kfiorello@cicerony.gov>  
**Sent:** Monday, August 11, 2025 7:57 AM  
**To:** chipsnepa@chips.gov  
**Cc:** Michael Aregano  
**Subject:** [EXTERNAL] Town of Cicero Draft Micron EIS comments

On behalf of the Town of Cicero, we offer the following comments relative to Appendix M, Vol. 4.

Sheet No. 6

The improvements to Lakeshore Road and the Lakeshore Road Spur do not indicate a Shared Use Path or sidewalk. Though there are currently no sidewalks on Lakeshore Road for this proposed improvement to connect into, it is common for pedestrians to walk along the road shoulder. A sidewalk off of the road surface up to the Rt-31 intersection would be a prudent and appreciated feature. Adding safe pedestrian connections is very important to the community.

Sheet No. 6b

The connection to the new I-81 interchange from Route 11 and Sneller Road, does not indicate any Shared Use Paths or sidewalks. Adding pedestrian connections is very important to the community.

Thank you for your serious consideration.

**Kate Fiorello, P.E.**

Town Engineer  
Town of Cicero, New York

[kfiorello@cicerony.gov](mailto:kfiorello@cicerony.gov) | phone: 315-752-1182  
6658 State Route 31, Cicero, NY 13039

---

**From:** Tracy Frisch <tracy.frisch@gmail.com>  
**Sent:** Monday, August 11, 2025 2:43 PM  
**To:** chipsnepa@chips.gov  
**Subject:** [EXTERNAL] Comments on Micron DEIS

August 11, 2025

**Via Email**

Mr. Robert Petrovich,  
Executive Director  
Onondaga County Industrial Development Agency  
335 Montgomery Street, Floor 2M  
Syracuse, New York 13202

Ms. Lynelle McKay  
Director  
C.H.I.P.S. Program Office  
National Institute of Standards and Technology  
100 Bureau Drive  
Gaithersburg, MD 20899

Re: Draft Environmental Impact Statement for Micron Semiconductor Manufacturing Project, Clay, NY

Dear Mr. Petrovich and Ms. McKay:

On behalf of Clean Air Action Network of Glens Falls (CAAN), I am submitting these comments on the Draft Environmental Impact Statement (“DEIS”) for the Micron Semiconductor Manufacturing Project in Clay, New York (the “Project”). CAAN is a regional citizens organization focussed on preventing air pollution and protecting public health and the environment from harmful pollution. CAAN is a member of the PFAS-Free NY campaign committed to fighting for upstream solutions and downstream protections from a dangerous class of toxic chemicals called per and polyfluoroalkyl substances (“PFAS”). These substances are often referred to as “forever chemicals” because of their extreme persistence and ubiquity in the environment. It is estimated PFAS contaminate up to 45% of the nation’s tap water and are found in the blood of nearly the entire U.S. population.

PFAS contamination has spread across the world, harming countless people and species. The health risks associated with PFAS are well established and broadly recognized by international scientific organizations, federal and state regulatory agencies, and other leading scientific bodies. Many PFAS are associated with “significant and diverse” adverse health effects that include cancer, liver disease, decreased fertility, high cholesterol, reduced vaccine response, and more.

New York is not immune to the impacts from PFAS. Millions of New Yorkers are living with the legacy of unregulated PFAS releases. Almost half of New York’s public drinking water systems are contaminated by PFAS, and more than two-thirds of the inactive landfills in the state have unsafe levels of PFOA, PFOS, or both in their groundwater impacting private well owners. In addition, PFAS already contaminates multiple sites in the vicinity of the Project, increasing the potential for cumulative exposures. There is known PFAS contamination at the Hancock Field Air National Guard Base in Syracuse. There is suspected PFAS contamination at the Oak Orchard Wastewater Treatment Plant site, where

Micron intends to build the Project's new industrial wastewater treatment facility. And there are multiple facilities in the area that are suspected of using or having used PFAS, including two airfields immediately south of the Project site.

With PFAS already costing the state up to \$4.4 billion in annual health care costs and millions in drinking water treatment and site remediation, New Yorkers cannot afford for this Project to worsen the New York's PFAS crisis. Instead, the Project should be a model of sustainable semiconductor production, and a demonstration that domestic microchip production need not come at the expense of our health and the environment.

A necessary first step towards responsible semiconductor manufacturing is a comprehensive analysis of the environmental and social impacts of proposed manufacturing projects. Unfortunately, the Project's DEIS does not provide enough detail on Micron's use, disposal, and release of PFAS for the public to understand the Project's environmental and human health impacts. Because the scope and severity of the anticipated impacts are not disclosed, the mitigation needed to ensure health protective control of PFAS at the proposed facility remains unclear.

#### ***DEIS must rely on the science-based definition of the PFAS class***

A threshold point for the DEIS, it must rely on a science-based class definition of PFAS. As acknowledged in the DEIS, the assessment and regulation of PFAS "depend[s]" in large part "on the definition of PFAS applied." The New York Legislature, United States Congress, more than 100 leading scientists, and 16 state attorneys general have all defined PFAS as a class of chemicals containing "at least one fully fluorinated carbon [atom]." This definition has broad scientific support, since it is the presence of a fully fluorinated carbon that gives PFAS their common trait of persistence. We urge the project proponents to rely on this science-based PFAS definition, which is already enshrined in multiple provisions of New York State law.

While EPA claims to define the PFAS class on a "case-by-case basis," as opposed to relying on a single consistent definition, prior EPA definitions have excluded thousands of PFAS recognized by the Organisation for Economic Co-operation and Development ("OECD"), New York State, and others. These exclusions have no scientific basis, and if applied to semiconductor manufacturing many PFAS would be excluded that are used or formed during production. For instance, EPA's prior definitions did not include polyvinylidene fluoride ("PVDF"), a PFAS used in semiconductor manufacturing, or trifluoroacetic acid ("TFA"), which forms when the fluorinated gasses used to make semiconductors break down in the environment. To fully assess the Project's PFAS impacts, the DEIS must use a definition that encompasses the full PFAS class.

#### ***DEIS must discuss Micron's use and discharge of PFAS chemicals***

PFAS are widely used during the production of semiconductors, and while PFOA has predominately been phased out, semiconductor plants continue to use "short-chain" PFAS, which are often associated with the same types of health effects as the long-chain PFAS they are used to replace. PFAS in wastewater discharges has been detected at other facilities producing semiconductors. Based on information obtained from Global Foundries semiconductor manufacturing facility in Essex Junction, Vermont, at least 17 different PFAS have been detected in the wastewater discharged. Up to 78,000 parts-per-trillion of PFAS were detected in another domestic semiconductor plant's wastewater.

The DEIS does not identify which PFAS Micron will use or specify how Micron plans to treat and dispose of its PFAS-containing waste. It only offers noncommittal assurances that PFAS concerns will be handled in future permitting processes, deferring the evaluation and mitigation of significant adverse impacts without any certainty that such permits would even address PFAS releases. This is an unacceptable level of detail given the serious risks PFAS pose and the knowledge that PFAS will be used at the proposed facility. This approach is problematic and not protective, because New York does not sufficiently regulate PFAS as a class in permitting industrial facilities (DEC only regulates PFOA and PFOS). This regulatory gap gives no assurances that PFAS will not be permitted into the environment.

The environmental analysis must identify the specific PFAS to be used at the facility; how those PFAS will be used; and all anticipated releases via air emissions and surface and wastewater discharges, including discharges from the Project's industrial wastewater treatment plant ("IWWTP"). The Final EIS must incorporate mitigation measures to require safer, non-PFAS alternatives wherever available and specify permitting conditions that prohibit the release of PFAS used at the Micron facility.

#### ***DEIS must discuss Micron's PFAS Air Emissions***

The DEIS acknowledges that Micron will use and release fluorinated gasses ("F-gasses"), with almost 2.5 tons of projected "fluorides" emissions from fabs 1 and 2 alone. But the DEIS overlooks the fact that many F-gasses are themselves PFAS or PFAS-precursors, the adverse impacts of which extend far beyond their contribution to climate change.

F-gasses comprise more than 60 percent of the world's annual PFAS emissions. In the environment, most F-gasses degrade into trifluoroacetic acid ("TFA"), one of the most prevalent PFAS. In addition to its high persistence, TFA is associated with developmental toxicity and liver and thyroid harm. TFA is ubiquitous in the environment and extremely difficult to control, since "methods to remove TFA from water are expensive and often inefficient due to TFA's persistence and mobility." Here, not only does the DEIS fail to mention TFA, but the County "never considered the potential impacts of the Project's [F-gas] emissions at all." "

The DEIS fails to discuss the limitations of thermal treatment options for PFAS, which resist thermal degradation, despite industry's claims of high PFAS destruction rates, recent air sampling around a Chemours thermal oxidizer in North Carolina detected high levels of PFAS. Air permits for existing Micron facilities do not address PFAS air emissions, and the DEIS contains "no 'reasoned elaboration' as to why . . . the issuance of a state facility permit . . . would result in no significant adverse environmental impact from the project's air emissions." The final EIS must consider the Project's PFAS air emissions and impose specific mitigation measures to address PFAS air emissions in subsequent state permits.

#### ***DEIS must discuss Micron's disposal of PFAS chemicals***

Their unique chemical structure also makes PFAS difficult to treat and dangerous to dispose of. Conventional wastewater treatment processes will remove some, but not all PFAS, especially the short-chain PFAS that are most widely used in semiconductor manufacturing. Even the successful removal of PFAS from wastewater creates waste products – such as spent carbon filters or reverse osmosis concentrate – with high PFAS concentrations. The disposal of these treatment residuals presents further problems, since traditional means of waste disposal do not effectively contain or destroy PFAS.

The incineration of PFAS waste presents similar concerns. PFAS are widely used in firefighting foam precisely because they do not break down when burned. Those same properties make PFAS extremely difficult to incinerate, and EPA has acknowledged that "the effectiveness of incineration to destroy PFAS compounds . . . is not well understood." The incomplete combustion of PFAS "can result in the formation of smaller

PFAS,” as well as other toxic chemicals like hydrogen fluoride. These products of incomplete combustion are then released with any residual PFAS via the incinerator’s air emissions, “spread[ing] them into surrounding areas.” The final EIS must consider the Project’s PFAS disposal and impose specific mitigation measures to ensure disposed.

### ***Micron Fails to Commit to Any Concrete PFAS Mitigation Measures***

The DEIS must identify practicable PFAS mitigation measures. As described above, there are significant gaps in the DEIS analysis in respect to PFAS air or water releases, and wastes, and the DEIS commits only to compliance with future administrative processes and regulations.

Below are a non-exhaustive list of mitigation measures that are needed to “minimize or avoid” the significant adverse effects associated with PFAS. These mitigation measures should be enshrined as conditions to facility permits (e.g., SPDES, Title V).

- **Monitoring:** Significant monitoring protocols should be employed to monitor the Project’s impacts and identify potential PFAS releases using EPA-approved methods that cover the greatest range of detectable PFAS. This monitoring should include monitoring of water discharges (surface and wastewater, before and after pretreatment), air emissions. Micron should fund the quarterly monitoring of PFAS in the influent, effluent and biosolids from the Industrial Wastewater Treatment Plant at the Oak Orchard Site (“IWWTP”).
- **Minimization:** Micron should be required to conduct a PFAS Alternatives Assessment to evaluate the specific PFAS that are known, intended, or reasonably foreseen to be used on site; the respective functions of such PFAS; and whether such PFAS can be reduced or eliminated. The PFAS Alternatives Assessment shall be made public on a dedicated, easy-to-find webpage. Micron should also be required to use less hazardous, non-PFAS alternatives wherever practicable, and prepare an annual report on its actions taken to reduce or eliminate PFAS use.
- **Pretreatment:** The Onondaga County Department of Water Environment Protection (“OCDWEP”) should be required to implement a Pretreatment Program for discharges to the Project’s IWWTP, in accord with Clean Water Act regulations. Such a pretreatment program shall prohibit the discharge to surface or groundwater of any wastewater containing any detectable PFAS to the IWWTP.

Micron must be required to install a pre-treatment plant or have one installed at the Onondaga County industrial WW treatment plant. It should use state-of-the art treatment technology which completely eliminates the entire range of PFAS compounds. An example of such technology is reverse osmosis, followed by treatment of the concentrated reject stream using advanced oxidation or surface plasma treatment. Removal and destruction of PFAS must be confirmed using sophisticated analytical techniques which are capable of detecting the wide range of PFAS compounds which may be present.

- **Other measures:** The SPDES permits issued to Micron and the IWWTP shall include effluent limitations and/or new source performance standards for all PFAS that Micron knows or foresees will be discharged from the facility, including degradation byproducts that are PFAS. Consistent with New York and federal law, if neither EPA nor New York has developed effluent limitations, standards, or guidance values for a PFAS that Micron foresees discharging, DEC should develop the effluent limitations and/or standards based on the best available technologies economically achievable using its best professional judgment. The SPDES permit issued to the IWWTP shall prohibit the land application of biosolids.

### **Conclusion**

We urge Project Proponent and other involved agencies to fully evaluate the Project’s PFAS impacts, to consider feasible alternatives and mitigation measures, and to require mitigation that eliminates significant adverse impacts by preventing PFAS releases and exposures.

The current DEIS inappropriately defers PFAS impacts and lacks sufficient assurances to protect the community and New York’s environment. The Project should be a model of sustainable semiconductor production, and a demonstration that domestic microchip production need not worsen the nation’s PFAS contamination crisis. The final EIS should require mitigation that eliminates significant adverse impacts by preventing PFAS releases and exposures.

Respectfully submitted,

Tracy Frisch, MS

Chair

Clean Air Action Network of Glens Falls

PO Box 7

Glens Falls, NY 12180

[tracy.frisch@gmail.com](mailto:tracy.frisch@gmail.com)

---

**From:** mrsGionet@gmail.com  
**Sent:** Monday, August 11, 2025 9:51 AM  
**To:** CHIPSNEPA@chips.gov  
**Cc:** Melanie Gionet  
**Subject:** [EXTERNAL] Questions

---

Why didn't you want to hold more public hearings on environmental impacts?  
Why are you not extending the deadline as requested?

That doesn't seem like a good partnership to me.

Ever see the movie Erin Brockovich? That's what the plant and lack of planning for true and very real environmental concerns reminds me of. Your plant and jobs are not wanted here if you can not transparently disclose everything you are doing about every question below. Our area is beautiful and you're about to screw it all up if you don't take this seriously. Go somewhere else if you can't figure all of this out with careful planning and full disclosure of those detailed plans BEFORE you take any further actions or touch our pristine area. Most of us do not want this so the lack of proper planning and disclosures just makes it even worse.

## 1. Water usage and quality

- **Clarification on wastewater discharge:** Micron initially projected discharging 4 million gallons of wastewater per day, which was later revised to 8-20 million gallons/day. What factors contributed to this significant increase, and what further details can be provided on the anticipated volume and composition of the discharge?
- **Wastewater treatment effectiveness:** While Micron plans to build an on-site pretreatment plant and utilize the county's expanded wastewater treatment facility, details on the specific technologies and expected effectiveness in removing all pollutants, especially "forever chemicals" (PFAS), remain unclear. How will Micron ensure the complete and safe removal of all hazardous substances before discharge into the Oneida River, and will regular, independent monitoring be conducted to verify treatment effectiveness?
- **Contingency plans for spills and leaks:** Given the significant volume of chemicals stored and used on-site (up to 56 million gallons of corrosives), what are the comprehensive contingency plans and emergency response procedures in place to prevent and manage potential spills or leaks, particularly into water sources like Lake Ontario and surrounding wetlands?
- **Transparency on chemical usage:** Public concern exists regarding the lack of transparency about the specific chemicals Micron will use in its production process. What steps will Micron

take to disclose this information, recognizing the potential impact on public health and the environment?

## 2. Air quality and greenhouse gas emissions

- **Greenhouse gas emission mitigation:** The DEIS estimates Micron's annual direct and indirect CO<sub>2</sub> emissions at nearly 5 million tons, potentially threatening New York State's climate goals. While Micron pledges to purchase carbon-free electricity, concerns exist regarding the feasibility and impact of acquiring such a large amount of renewable energy credits and power purchasing agreements in New York State. What concrete steps will Micron take to ensure its operations align with the state's climate goals, and are they actively exploring on-site renewable energy generation beyond the proposed rooftop solar panels?
- **Air emission monitoring and control:** What specific technologies and protocols will be implemented to monitor and control air emissions, especially hazardous air pollutants, from the manufacturing process and supporting facilities (e.g., bulk gas yards)? How will Micron ensure these measures are consistently effective in protecting local air quality?

## 3. Land use and habitat impact

- **Wetlands mitigation effectiveness:** Micron plans to destroy over 200 acres of wetlands and create/restore hundreds of acres elsewhere as mitigation. What measures will be in place to ensure the created/restored wetlands adequately replace the ecological functions and biodiversity of the destroyed wetlands?
- **Habitat preservation and management:** Given the presence of endangered and threatened species like the Indiana Bat on the project site, what long-term measures will be implemented to protect remaining habitat areas, ensure the effectiveness of conservation easements, and minimize disruptions during construction and operation?
- **Forest and grassland loss mitigation:** The DEIS projects the loss of over 10,000 acres of forests and grasslands due to Micron and associated development. What strategies will Micron implement to reduce or offset this loss, particularly considering the role these ecosystems play in carbon sequestration and biodiversity?

## 4. Community impacts and sustainability

- **Affordability of energy and water:** Micron's significant energy and water demands raise concerns about their impact on the affordability and availability of these resources for the wider community. How will Micron ensure their operations do not disproportionately burden residents through increased utility costs or resource scarcity?
- **Local infrastructure and emergency services:** The massive scale of the project will strain existing infrastructure, including roads, utilities, and emergency services. While plans for infrastructure improvements are mentioned, details are lacking on Micron's contributions to these costs and how impacts on services like emergency response will be managed, particularly during a potential chemical incident. We deserve to see the full plan, what is your plan?
- **Sustainable development goals and metrics:** Micron has committed to sustainable development goals within the Green CHIPS incentive program, such as reducing greenhouse gas emissions and expanding water restoration efforts. What specific, measurable metrics will be used to track progress towards these goals, and how will Micron ensure regular public reporting on these metrics?

Melanie Gionet

Sent from my iPhone

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**From:** Christa Glazier <cglazier@centerstateceo.com>  
**Sent:** Monday, August 11, 2025 11:38 AM  
**To:** CHIPSNEPA@chips.gov  
**Subject:** [EXTERNAL] CenterState CEO Comments - MICRON Draft EIS 2025  
**Attachments:** CenterState CEO Community Letter 8.11.25 - Micron DEIS submission.pdf

To whom it may concern,

CenterState CEO is pleased to submit comments for the Micron project Draft Environmental Impact Statement. Please see attached for our letter with comments, co-signed by more than 110 business and community leaders from the Syracuse and Central New York region.

Regards,

*Christa J. Glazier*  
*Vice President of Communications*

**CenterState Corporation for Economic Opportunity**  
115 W. Fayette Street  
Syracuse, NY 13202-3305  
315.470.1800 phone  
[www.centerstateceo.com](http://www.centerstateceo.com)





Aug. 11, 2025

Onondaga County Industrial Development Agency (OCIDA)  
ATTN: Micron Project  
335 Montgomery Street, Floor 2M  
Syracuse, New York 13202

To whom it may concern:

CenterState CEO is pleased to submit comments for the Micron project Draft Environmental Impact Statement, along with more than 110 business and community leaders.

After decades of disinvestment, manufacturing losses and economic stagnation, Central New York is at a moment of unprecedented investment, growth and opportunity. A moment of growing optimism and hope for the future, one where competitive industries can thrive, attract new residents, and where our kids don't have to look elsewhere to find opportunity.

That moment was sparked when Micron Technology announced in October 2022 it would invest \$100 billion to construct four fabs in the Town of Clay. The company's decision was made possible because leaders in Onondaga County realized they had something special in Clay's White Pine Commerce Park. It offered a unique set of infrastructure assets, with requisite power, water and geology. Combined with strategic property acquisition over the past few years, it is one of a handful of sites in the nation large enough to attract such a semiconductor megaproject, an increasingly important industry for consumers, businesses and U.S. national security. Micron, one of the world's leading computer chip manufacturers, was attracted by the site's amenities, and saw promise in the region's workforce and commitment to further building a skilled talent pipeline.

After more than two years of expert review and significant public input, including several open houses and public hearings, our community's extensive planning was validated by one of the most exhaustive environmental analyses ever considered for a project in New York, the project's Draft Environmental Impact Study.

**When viewed in its totality, the DEIS shows that Central New York is one of, if not *the*, best places in the world for critical, leading-edge semiconductor manufacturing.**

Through this project, Micron is setting new standards for megaprojects in wildlife conservation and habitat protection, wetlands restoration and water recycling systems, to name a few. Perhaps most importantly, Micron's project in Clay will avoid approximately 77% of potential greenhouse gas emissions by adhering to New York's climate protection laws. In

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addition, more than 86% of the electricity used at the site will be generated from carbon-free energy sources.

At the same time, Central New York will benefit from sorely needed investments in regional infrastructure including water and wastewater systems, the electric grid and much-needed road and highway investments in Onondaga County's northern suburbs. We are already seeing commitments to expand and improve our civic infrastructure with needed investments in child care and health care across the region. Building permits for new housing are up by more than 50%, which will help address both current and future housing needs. These investments are in addition to the \$500 million Community Investment Fund established as part of Micron's commitment to New York State through the Green CHIPS Excelsior Jobs program.

These benefits precede the project's 4,200 construction jobs, 9,000 permanent jobs and up to 40,000 follow-on jobs expected to drive meaningful population growth to the Syracuse area for the first time in generations, delivering \$16.7 billion in annual real economic output in New York.

In 2041, when its fourth fab is complete, Micron employees in Clay, along with other fabs in the Northeast, will produce one in every four chips made in America. The DEIS notes that the scale of production at all four fabs is crucial to the financial viability of this project and U.S. economic and national security needs.

The Micron Project DEIS confirms what we have long believed—that Central New York is the best region in the nation for semiconductor development—environmentally, socially and economically. We look forward to our continued close partnership with Micron as it builds the most environmentally sustainable chip facility in the world.

Sincerely,



**Ben Sio**  
**Acting President, CenterState CEO**



Michael Rost  
President, ACC Technical Services

Michael Wetzel  
President & CEO, Air Innovations, Inc.

Margaret O'Connell  
Executive Director, Allyn Family Foundation

Vaughn Crawford  
Director of Operations, Altius Aviation

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Chief Executive Officer, Home Builders & Remodelers of Central New York

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Ken Stewart  
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Sam Rowser  
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Susan Crossett  
CEO, Sapphire Recruitment, Inc.

Chedy Hampson  
Founder & Board Chair, South Side Community Growth Foundation

Kevin Hair  
President, SRC, Inc.

Dr. Mantosh Dewan  
President, SUNY Upstate Medical University

Dr. Ofrona Reid  
President & CEO, Syracuse Community Health

H. Jason Terreri  
Executive Director, Syracuse Regional Airport Authority

Shannon Reedy  
VP of Account Management, Terakeet, LLC

Jeremy Thurston  
President, The Hayner Hoyt Corp.

Lauren Kochian  
President, The MOST

Pam Murchison  
Executive Director, The Syracuse Orchestra

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David Schneckenburger  
President, Thompson & Johnson Equipment Co. Inc.

Brian Bisaccio  
Senior Vice President, Northern Region Manager, Tompkins Community Bank

David Kimmel  
President, Two Plus Four Companies

Nancy Eaton  
President, United Way of Central New York

John Sharkey III  
President, Universal Metal Works, LLC

Jamar Clarke  
Executive Director, Upstate Minority Economic Alliance

Meghan Tidd  
CEO, VIP Structures, Inc.

Danny Liedka  
President/CEO, Visit Syracuse

David Foor  
President, Visual Technologies

Evelyn Ingram  
Director Of Media & Community Relations, Wegmans Food Markets, Inc.

Joseph Scuderi  
President, Widewaters Group, Inc.

Sam Serianni  
Professional Mobility Consultant, Wireless Business Group

Tom Fernandez  
President, Woodbine Group, Inc.

Josh Royce  
President & CEO, YMCA of Central New York

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---

**From:** Ethan Gormley <egormley@citizenactionny.org>  
**Sent:** Monday, August 11, 2025 7:36 AM  
**To:** CHIPSNEPA@chips.gov  
**Subject:** [EXTERNAL] Micron DEIS Comment - Clay, NY  
**Attachments:** Comments on Micron DEIS 8 11 25 (final).docx

---

Good morning,

Please find the attached comment from Citizen Action of New York in response to Micron's DEIS for the Clay, NY plant.

If you have any issues with the attachment, please let me know.

Thank you,

Ethan Gormley

--

Ethan Gormley  
Regional Climate Justice Organizer  
Citizen Action of New York and Public Policy and Education Fund of New York  
(518) 250-8983 (c)  
[citizenactionny.org](http://citizenactionny.org)  
[www.citizenactionny.org](http://www.citizenactionny.org); [www.ppefny.org](http://www.ppefny.org)



August 11, 2025

ATTN: Micron Project  
Onondaga County Industrial Development Agency (OCIDA)  
335 Montgomery Street, Floor 2M  
Syracuse, New York 13202

Dear Sir or Madam:

Citizen Action of New York (Citizen Action) welcomes this opportunity to comment on the Micron Technology (Micron) draft environmental impact statement (DEIS) for the Clay, New York project. Citizen Action is a grassroots membership organization that advocates for social, racial, economic, and environmental justice with chapters or affiliates in eight regions of New York State. Among our policy concerns are climate justice, housing, health care, criminal justice, state and federal budget policies, fair elections, and consumer rights.

**I. Need for an Extension of the Comment Period and Expanded Hearing Process**

Citizen Action joins Central New York (CNY) environmental, workforce, and numerous community organizations in calling for the Onondaga County Industrial Development Agency (OCIDA) to ensure that the massive Micron project benefits neighboring communities and does not inflict harm to the health of Central New Yorkers or the environment. With such a massive project, often touted as the largest private investment in state history, a 45-day comment period is utterly insufficient for a 20,000-page DEIS. Given just 45 days, an individual would have to read over 440 pages a day to get through the DEIS front to back. Additionally, hosting only one day of in-person hearings in one location is simply not enough. The public is entitled to a fair and transparent process in the face of a project with such vast impacts. For these reasons, we urge OCIDA to extend the comment period and host multiple hearings across different days and different times in various locations across CNY.

**II. Compliance With the New York Climate Law and Opposition to Use of Nuclear Power**

Driven by climate change, Central New Yorkers are facing increased instances of extreme weather events, such as heatwaves, flooding, and even tornadoes. The nation and the

world are similarly experiencing horrible loss of life and property from these ever-increasing extreme weather events, most recently seen with deadly flooding in Texas. In response to the climate crisis, New York passed its landmark 2019 climate law, the Climate Leadership and Community Protection Act (CLCPA). This law requires the state to drastically reduce its greenhouse gas emissions and to transition to a renewable energy economy.

By expanding its operations into New York State with the massive Clay project, Micron must adhere to the CLCPA. In order to do so, Micron must commit to generating and investing in a significant amount of renewable energy while greatly reducing its impact on our climate by mitigating any greenhouse gas emissions from its factories. To abide by the 100% renewable energy commitment between Micron and New York State, Micron must commit to investing in proven and safe renewable energy such as wind, solar, geothermal, and battery storage. This must be done without purchasing renewable energy credits.

In addition, Micron must not substitute new nuclear power, otherwise referred to as advanced nuclear power, for the proven and safe renewable energy sources previously mentioned. Pursuing new nuclear facilities in New York will lead to an unfair cost burden on New Yorkers, as proven by the massive bailouts already provided to nuclear facilities in Oswego County. Not only that, more nuclear power will result in additional dangerous nuclear waste being stored and transported in Central New York, threatening the health and safety of its residents.

### **III. Micron Cannot Endanger the Health or Environment of Central New York**

Hundreds of chemicals are used to create microchips, a number of them toxic. It is imperative that Micron does not endanger the health of Central New Yorkers and the environment through exposure to these chemicals, including but not limited to PFAS, often referred to as forever chemicals. Numerous communities across New York State, including Hoosick Falls in Rensselaer County, have suffered massive harms from PFAS exposure. We cannot risk any such exposure in Clay and surrounding communities. Therefore, Micron must limit its use of toxic chemicals to the greatest extent possible and must commit to protecting the surrounding soil, water, and air from contamination.

### **IV. Additional Concerns**

The massive Micron project impacts many facets of CNY beyond its climate, environmental, energy usage, and chemical issues. Citizen Action of New York shares the concerns raised by Jobs to Move America (JMA) regarding Micron's impacts on wetlands, native species, and ecological communities, job access, workforce development, equitable and safe workplaces, housing and transportation justice and equity.

Once again, thank you for the opportunity to comment on the Micron DEIS. If you have any

questions, I may be reached via the telephone number or email below.

Very truly yours,

A handwritten signature in black ink, appearing to read "Bob Cohen". The signature is fluid and cursive, with the first name "Bob" and last name "Cohen" clearly distinguishable.

Bob Cohen, Esq., Research and Policy Director

**Citizen Action of New York, Inc.**

94 Central Avenue

Albany, NY 12206

(518) 265-6183

[bcohen@citizenactionny.org](mailto:bcohen@citizenactionny.org)

cc: chipsnepa@chips.gov

---

**From:** Samuel Gruber : <samuelgruber@gmail.com>  
**Sent:** Monday, August 11, 2025 10:32 PM  
**To:** chipsnepa@chips.gov  
**Subject:** [EXTERNAL] Comments on Micron Draft Environmental Impact Statement

To Whom it May Concern,

I have many concerns about Micron Fab plant development, and many of these were not fully addressed in the DEIS. It has been said repeatedly that this is an “Erie Canal Moment” for Central New York. As an historian, I am acutely aware that while the Erie Canal brought significant changes and advancement to many settled in Central New York, it also tremendously and adversely affected the Indigenous population that was already there and made unalterable changes in the ecology and economy of the region. Micron may make equally big changes.

We need to support the changes that we deem beneficial and work hard to document and mitigate the most harmful impacts.

For me – and many others who have followed the development of this project and the roll-out of the DEIS - these fall into three main categories.

1. Excessive water consumption and the likelihood of regular and unintentional water contamination of local lakes, rivers, streams, and wells. Does the massive projected outflow of Lake Ontario water to Micron violate the Great Lakes Compact?
2. Excessive energy consumption that cannot now be met with renewable sources without forced more use down the line of fossil fuels (as well as higher electric prices for smaller residential and commercial consumers). Micron is going to exponentially INCREASE energy use in New York State. How realistic is it that this increase can be met with renewables. Isn't it more realistic that for many years we will see an increase in fossil fuel use (especially gas) in New York State due to Micron energy needs?
3. The excessive use of PFAS (“forever”) chemicals without proper consideration and oversight of what these chemicals are, what their effects are individually and collectively, and how they will be stored and disposed of. PFAS chemicals (forever chemicals) are often highly toxic and are always persistent in the environment. Like most chemicals introduced for industrial and other use there is little or no advance testing for health and safety impacts, and there is no testing of chemical combinations.

I have some faith that the regulators, engineers, and government agencies will work with Micron to manage water and energy use. The problems need to be recognized, and Micron and other technology leaders should

commit to not just supporting chip manufacturing, but to support and develop technological development that will reduce water and electrical use.

Based on my past work as an historian fo the plastics industry, I am much more worried about the third item – chemicals. Here one cannot see the danger, but we know from experience that the dangers of chemical pollution can be very serious, and importantly long-lasting. The harm done often is not even measurable until the damage is done (and sometimes even the polluting factory has closed).

In the case of Micron – we do not even know the names and numbers of the actual chemicals used in their chip process – so NONE of the chemicals can be evaluated. This problem is not unique to Micron, but in this case since so many taxpayer dollars are spent to develop this project, we need much more transparency and oversight, and absolute dedication by Miron to continuously monitor and improve the use and disposal of PFAS and other toxins. PFAS don't break down, they accumulate in the soil and the water and in wildlife – and can in humans, too. We know in Update New York the perils of unmonitored and untested industrial pollution. We are still cleaning up the mess of the 19<sup>th</sup> and 20<sup>th</sup> centuries, and thousands and paid the price in health problems over the decades. We need to go into the Micron era with eyes wide open, and with a commitment to public health and environmental quality. Micron should provide a detailed list of chemicals for the mixing zone in the Oneida River and then dispersed in Lake How does the disbursement take place, who monitors, and how often? How will unintentional chemical spills be dealt with, and how many chemicals will be stored on site, and under what control?

Lists of chemicals released into the air should also be provided and studied and well as a detailed list of industrial waste going into local landfills.

Like everyone else in the region I am also concerned about traffic, local jobs, rising housing prices ...but I think all these things can be reasonably addressed. But we still need better answers about Water, energy and chemical.

Thank you,

Samuel D. Gruber, Ph.D.

(former curator of the Plastics Collection, Syracuse University)

123 Clarke Street

Syracuse, NY 13210

Samuel D. Gruber, Ph.D.

123 Clarke Street

Syracuse, NY 13210

+1 315 762-2850

[samuelgruber@gmail.com](mailto:samuelgruber@gmail.com)

<https://samuelgruber.com>

---

**From:** Kristen Haitaian <kristen@freshwaterfuture.org>  
**Sent:** Monday, August 11, 2025 10:00 AM  
**To:** chipsnepa@chips.gov  
**Cc:** Jill Ryan; Grenetta Thomassey; Ann Baughman  
**Subject:** [EXTERNAL] Comment: Micron 2025 Draft Environmental Impact Statement  
**Attachments:** Micron DEIS Comment\_Freshwater Future\_08112025.docx.pdf

Good morning:

Please see the attachment with the formal comment.

Sincerely,

--

**Kristen Haitaian** (she/her)  
Program Co-Director



FRESHWATER  
FUTURE

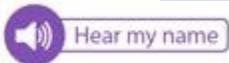
231-348-8200 ext. 9

P.O. Box 2479

Petoskey, MI 49770

[kristen@freshwaterfuture.org](mailto:kristen@freshwaterfuture.org)

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I am currently residing on the traditional unceded territory of the Mississagua, Bodwewadmi, Anishinabewaki, and Peoria People's lands.

August 11, 2025

Onondaga County Industrial Development Agency (OCIDA)  
ATTN: Micron Project  
335 Montgomery Street, Floor 2M  
Syracuse, New York 13202  
Submitted to: chipsnepa@chips.gov

**Re: MICRON PROPOSAL DEIS COMMENTS RE: WATER USE AND THE GREAT LAKES COMPACT**

Dear Onondaga County Industrial Development Agency,

Thank you for the opportunity to provide feedback on the Draft Environmental Impact Statement (DEIS) for the planned Micron semiconductor manufacturing facility in Clay, New York. Freshwater Future is a Great Lakes-based, binational 501(c)(3) and is a catalyst for community action that strengthens policies designed to safeguard the waters of the Great Lakes region. Our organization submits this comment to specifically address the project's estimated water use and the requirements of the Great Lakes Compact ("the Compact"). Freshwater Future was an active contributor to the creation of the Compact and has significant concerns that current water withdrawal permits underestimate the scale of the proposed project's water use.

The Great Lakes Compact seeks to protect the water in the Great Lakes Basin from diversions or large-scale withdrawals out of the Basin, in order to keep water in the ecosystem. Depleting water would harm the ecosystem that millions of people depend upon for not only drinking water, but also for the quality of life and culture created by living in the Basin.

The Compact recognizes "consumptive use" and makes certain allowances. For example, water used in the manufacturing process that leaves the basin as part of a product is a consumptive use and is not considered a diversion under the Compact. However, the Micron Proposal DEIS triggers a concern related to the Compact due to the **scale** of water use and the potential consumptive use from this manufacturing operation.

New York state law was updated to incorporate the obligations required by the Compact. The state requires a permit for any type of water withdrawal system having the maximum capacity to withdraw 100,000 gallons per day (gpd) or more of surface water or groundwater. The DEIS notes that the 48 MGD (million gallons per day) that would be required for the full build-out of the Proposed Project would be sourced from Lake Ontario through the Lake Ontario Water Treatment Plant, which currently has a practical sustained output of approximately 54 MGD, a maximum capacity of 60 MGD, and a permitted water withdrawal limit of up to 62.5 MGD.

Also, according to the DEIS, Onondaga County Water Authority's (OCWA) existing infrastructure could accommodate the freshwater demand exclusively from Fabrication Buildings (Fabs) 1 and 2 with minor upgrades. However, to accommodate the freshwater demand beyond Fabs 1 and 2 and induced growth, OCWA would need to obtain a modification to its withdrawal permit. OCWA may pursue a permit modification earlier as part of its long-range capacity planning efforts.

**A review of the existing water withdrawal permits should be required now.** The DEIS notes that Table 3.10-3 shows the Proposed Project's estimated 2041 water usage, when added to current user demand, would exceed OCWA's base case water capacity by approximately nine percent. Micron asserts that uncertainty factors could dispute some concerns and that is reason enough to put off predictions of needed water use. We believe every effort should be made now to predict and request permissions related to water withdrawals, before the project is fully underway.

Also, the Proposal DEIS notes the following:

*The Proposed Project would rely primarily on water withdrawn, and ultimately returned to Lake Ontario, which is one of the largest freshwater bodies in North America (see Chapter 3.10, Utilities and Infrastructure). While there are projections for increased variability in lake levels under future climate scenarios, including potential for extreme highs and lows, the expectation is that water levels in the lake are anticipated to increase slightly in a future affected by climate change, which further indicates that the Proposed Project is unlikely to have any significant adverse impact on freshwater supply.<sup>1</sup>*

**No mention is made of the loss of water to consumptive use – potentially millions of gallons. Again, the existing permit should be reviewed now.**

---

<sup>1</sup> MICRON SEMICONDUCTOR MANUFACTURING PROJECT, CLAY, NY, DRAFT ENVIRONMENTAL IMPACT STATEMENT, Section 3.7.4 Climate Change and Resiliency, page 3-212

The State Environmental Quality Review Act requires agencies to identify any “adverse environmental impacts that cannot be avoided or adequately mitigated if the proposed action is implemented.”<sup>2</sup> The DEIS notes that significant adverse impact is considered “unavoidable” if there are no reasonably practicable mitigation measures to eliminate the impact, or if there are no reasonable alternatives to the proposed project that would meet the purpose and need of the action, eliminate the impact, and not cause other or similar significant adverse impacts.

In chapter 5 of the DEIS, the following is noted:

*The Preferred Action Alternative also would have significant effects on localized surface water and stream resources despite the implementation of mitigation measures. See Chapter 3.3 (Water Resources). As a result of the construction of the Proposed Project, most of the existing stream channels currently located in what would become the Micron Campus Site and Rail Spur Site would be lost. Loss of these surface water and stream resources is considered an unavoidable significant impact of the Preferred Action Alternative.*<sup>3</sup>

We urge DEC to review the water withdrawal permits to ensure that the spirit of the Great Lakes Compact is upheld for the development of this important proposal.

Sincerely,



Jill M. Ryan  
Executive Director

---

<sup>2</sup> 6 NYCRR § 617.9 (b)(5)(iii)(b)

<sup>3</sup> Ibid, page 5-1



August 11, 2025

CHIPS Program Office  
U.S. Department of Commerce  
100 Bureau Drive  
Gaithersburg, Maryland 20899

Onondaga County Industrial Development Agency  
335 Montgomery Street, Floor 2M  
Syracuse, New York 13202

To Whom it May Concern:

On behalf of Syracuse University, I write in support of the Draft Environmental Impact Statement (DEIS) released by Onondaga County, the U.S. Department of Commerce, and Micron.

Syracuse University is a private research university that advances knowledge across disciplines to drive breakthrough discoveries and breakout leadership. Our collection of 13 schools and colleges with over 200 customizable majors close the gap between education and action, so students can take on the world.

The DEIS marks a major milestone in transforming Micron's historic investment in Central New York from promise to reality. This once-in-a-generation opportunity will reshape our region, drive innovation and advance economic prosperity for all. Syracuse University stands proudly in support of this ambitious endeavor.

The DEIS outlines the scope of the project and reflects a careful approach to managing the potential impacts of a development of this scale. Syracuse University's deep commitment to a sustainable future is evidenced by the aggressive goals outlined in our Climate Action Plan and is part of our ethos. That is why we are encouraged by the substantial investment and thoughtful mitigation strategies proposed to protect public health, local ecosystems and the overall quality of life in our region.

Since 2022, when Micron and elected leaders first gathered on our campus to announce the company's plans, Syracuse University has worked closely with regional partners to help lay the foundation for long-term success.

Through our leadership in the Future-Ready Workforce Innovation Consortium, together with our area partners, we are developing a cutting-edge talent pipeline for New York State and beyond. This effort includes academic programs, skills training and forward-thinking partnerships to build a strong, sustainable workforce pipeline.

Syracuse University's D'Aniello Institute for Veterans and Military Families (IVMF) has partnered with Micron to create the nation's first semiconductor training hub focused specifically on veterans and military-connected individuals. The inaugural cohort has already completed training, a testament to the speed and seriousness with which we are approaching this opportunity.

We are also collaborating with Onondaga County on the Syracuse University Center for Advanced Semiconductor Manufacturing, which remains on track to open later this year. And as a founding member of the Northeast University Semiconductor Network, our University is helping to build the academic and training infrastructure that the semiconductor industry in Central New York will need to thrive.

On campus, we are fostering a culture of awareness and engagement. Our first annual Micron Day in early 2025 introduced students, faculty, and staff to Micron leaders and provided insights into the groundbreaking work ahead. Micron Day reflects our belief that real opportunity starts with deep understanding.

Syracuse University is also expanding the impact and contributions of its College of Engineering and Computer Science to help Micron meet its demand for highly skilled engineers and scientists. And through the Micron Student Internship Program, we are preparing tomorrow's professionals to move directly from campus to careers in semiconductors.

Why does this matter? Because Micron's investment goes far beyond jobs and buildings. It's about our community and our people's futures.

For our region: economic revitalization, population growth, and a renewed position at the forefront of American innovation. For students: new internships, career paths, and hands-on learning. For faculty and staff: new collaboration opportunities, research expansion, and professional growth and development.

Much like the Erie Canal once opened New York to the world and transformed its economic future, Micron's presence in our community has the potential to redefine what's possible for this region and for the nation.

A project of this magnitude will come with challenges, change and growing pains. But more than anything, it brings unprecedented opportunity - to transform lives, strengthen our communities and shape the future of Central New York. This is not the moment to pause. This is the moment to lead.

Syracuse University stands ready to meet that moment - not just for our campus, but for our region and our country. The path ahead demands bold action, shared commitment, and unwavering resolve. Micron's success is Central New York's success.

Thank you for your consideration of these comments.

Sincerely,



J. Michael Haynie, Ph.D.  
Vice Chancellor, Strategic Initiatives & Innovation  
Executive Dean, Whitman School of Management  
Executive Director, D'Aniello Institute for Veterans and Military Families (IVMF)  
University Professor & Barnes Professor of Entrepreneurship

**Archived:** Wednesday, August 13, 2025 12:33:33 PM

**From:** [Eric Hellquist](#)

**Sent:** Mon, 11 Aug 2025 22:57:44

**To:** [chipsnepa](#)

**Subject:** [EXTERNAL] Watershed contamination

**Importance:** Normal

**Sensitivity:** None

---

Dear OCIDA,

The current moment and future of central New York is nicely summarized by the following song lyric:

*"Forget about tomorrow, why ask why?  
We'll all drink money when the well runs dry"*

I am extremely concerned with the expedited process surrounding the Micron Draft EIS.

The issue of PFAS/PFOA/per-and polyfluoroalkyl chemical contamination must be thoroughly, exhaustively addressed among dozens of other quality of life issues surrounding Micron.

We know why Micron is here. The water, the land, and a compliant local, state, and national government. There is money to be made here.

Central New York water is our most precious resource and contamination by forever chemicals is unacceptable. The depletion of our water supply for industrialization of Lake Ontario water and throughout the watershed is unacceptable. The public should not trade jobs for long term illness, environmental degradation, and litigation that will cost the taxpayers across generations. Water must be sacrosanct. PFAS/PFOA/per-and polyfluoroalkyl chemicals in our neighbors water is unacceptable. Turning Lake Ontario and our watershed into a toxic reservoir for industrial profit is unacceptable. We drink this water. We swim in this water. This water is our heritage. Will we protect it or turn it over to private industry?

We know the consequences. We know what has happened in Parkersburg, WV, Wilmington, NC, Hoosick Falls NY and the list goes on and on when public water becomes industrialized. The people of Syracuse and Oswego know all about these toxic legacies, let's not repeat that history listening to the music of Micron's siren song. Will we be fooled again? So far, it looks that way.

We know the strategies used by industry to hide the identity of toxins used in the manufacture of their PFAS/PFOA/per-and polyfluoroalkyl compound dependent products. The volumes of water potentially polluted by these unidentified chemicals is staggering.

We know how regulations are avoided by not disclosing the names of chemicals deemed "proprietary."

We know how industry pollutes based on regulations that are written in their favor so that compounds not specifically named in regulations don't have to be monitored or controlled.

We know that the precautionary principle is routinely ignored in favor of innovation and expediency and national security. We know these chemicals are not adequately monitored right now, let alone in a Micron world.

We know the games and deceits that allow our water to become toxic. Choices to look the other way kill people... see

the communities listed above. Does Central New York want to be a “sacrifice zone?”

We know how industry and a complicit government will want to fast track and ignore public concerns in the name of jobs, national security or national defense. They’ll scare us with threats that address everything but our health or a healthy environment.

We know about legal definitions and plausible deniability. Just because the tragically dismantled, toothless EPA says something isn’t a pollutant doesn’t make it right to pollute. We know the game. Define the problem out of existence and then claim plausible deniability.

We know how the “merchants of doubt” operate. We know how vandals of public trust operate.

Will a new standard be set in Central New York?

Will Micron, Onondaga County, the State of New York, and federal representatives do right by the people of this region? Or will our government betray the people for private profit margins? Should we trade employment for personal illness and tragedy?

As our government tries not to think about the pollution and water extraction issues (among dozens of others surrounding Micron), here are some basic pollution concerns.

1. How will Micron prevent ALL of the thousands of PFAS/PFOA/per-and polyfluoroalkyl chemicals from entering our drinking water supply?
2. Specifically, what filtration systems will be used to monitor PFAS/PFOA/per-and polyfluoroalkyl in our watershed and drinking water. What are the systems, how will they work, how often will they be replaced, and who will pay?
3. Who will pay for pollution remediation in our drinking water system when loopholes are used and contamination is inevitably discovered that is caused by previously undocumented PFAS/PFOA/per-and polyfluoroalkyl chemicals? We know the legal games ahead. Can we set the ground rules ahead of the pollution or will we be naive? Who will protect the family with polluted water?

All of us need to remember that Micron needs us. They need our water, our land, or business friendly environment. They are using public resources. However, their duty is to their shareholders, not the public of central New York. Their obligation is to profits for their shareholders.

The people and natural resources of central New York are simply a means to maximize profit margins. When we hold them accountable, I doubt they will be so friendly (see the polluters and their communities above). Same story, different location.

We, the public, expect the highest standards from Micron and all governmental representatives at all levels. Rest assured, a portion of the public is watching and we know the game. We won't be fooled. We follow facts and evidence, not platitudes and wishful thinking.

Thank you for your attention to this important matter.

Our health, families, and environment depends on your decisions.

Eric Hellquist  
Oswego, NY



---

**From:** ED - Web 1 <economicdevelopment@ongov.net>  
**Sent:** Monday, August 11, 2025 12:24 PM

---

**From:** Adam Hepburn <ajhepbur@syr.edu>  
**Sent:** Monday, August 11, 2025 10:48 AM  
**To:** chipsnepa@chips.gov <chipsnepa@chips.gov>  
**Cc:** ED - Web 1 <economicdevelopment@ongov.net>  
**Subject:** Micron Draft EIS 2025 Comment - Syracuse University

**NOTICE:** This email originated from **outside** of Onondaga County's email system. **Use caution** with links and attachments.

To Whom it May Concern,

Please see attached comment on the Draft Micron EIS on behalf of Syracuse University. Thank you for the opportunity to provide these comments.

Best,  
Adam

**Adam Hepburn**

Associate Vice President  
Strategic Initiatives and Government Engagement  
Office of the Vice Chancellor

[ajhepbur@syr.edu](mailto:ajhepbur@syr.edu) | 315.350.8186  
101 Waverly Ave., Syracuse, NY 13244





August 11, 2025

CHIPS Program Office  
U.S. Department of Commerce  
100 Bureau Drive  
Gaithersburg, Maryland 20899

Onondaga County Industrial Development Agency  
335 Montgomery Street, Floor 2M  
Syracuse, New York 13202

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For our region: economic revitalization, population growth, and a renewed position at the forefront of American innovation. For students: new internships, career paths, and hands-on learning. For faculty and staff: new collaboration opportunities, research expansion, and professional growth and development.

Much like the Erie Canal once opened New York to the world and transformed its economic future, Micron's presence in our community has the potential to redefine what's possible for this region and for the nation.

A project of this magnitude will come with challenges, change and growing pains. But more than anything, it brings unprecedented opportunity - to transform lives, strengthen our communities and shape the future of Central New York. This is not the moment to pause. This is the moment to lead.

Syracuse University stands ready to meet that moment - not just for our campus, but for our region and our country. The path ahead demands bold action, shared commitment, and unwavering resolve. Micron's success is Central New York's success.

Thank you for your consideration of these comments.

Sincerely,



J. Michael Haynie, Ph.D.  
Vice Chancellor, Strategic Initiatives & Innovation  
Executive Dean, Whitman School of Management  
Executive Director, D'Aniello Institute for Veterans and Military Families (IVMF)  
University Professor & Barnes Professor of Entrepreneurship

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**From:** Etana Jacobi <ejacobi@cwa-union.org>  
**Sent:** Monday, August 11, 2025 10:53 AM  
**To:** CHIPSNEPA@chips.gov  
**Subject:** [EXTERNAL] CWA Comments - Micron DEIS  
**Attachments:** 8.11.2025 -- Micron DEIS CWA Comments.pdf

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Please find comments from the Communications Workers of America attached.

Etana G. Jacobi  
[ejacobi@iue-cwa.org](mailto:ejacobi@iue-cwa.org)  
937-286-8463 (c)  
she/her/hers  
*Proud member of CWA Staff Union*

"The fight is never about grapes or lettuce. It is always about people." - César Chávez

August 11, 2025

ATTN: Micron Project  
Onondaga County Industrial Development Agency (OCIDA)  
335 Montgomery Street, Floor 2M  
Syracuse, New York 13202

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York.

Communications Workers of America, AFL-CIO, (CWA) is a union of hundreds of thousands of public and private sector workers in communities across the United States—including Puerto Rico, the U.S. Virgin Islands, and other U.S. Territories—and Canada. In New York, we represent 65,000 workers. Our members work in telecommunications and tech, the airline industry, manufacturing, news media, broadcast and cable television, education, health care, public service, and other fields. For years, CWA members have fought for domestic manufacturing, fair trade policies, and strong workplace and environmental standards for workers globally.

IUE-CWA is the industrial division of CWA. IUE-CWA members work in a wide range of manufacturing sectors, including power generation, aerospace, automotive, semiconductors, and other critical industries.

Despite the submission of the following comments, please consider that the 45-day comment period does not give the public enough time to read and fully understand the 20,000-page report. We are asking for an extension of the comment period to October 25, 2025, at a minimum, and note that there has been no public response to a petition signed by over 1,500 residents of the region asking the same. Based on our current understanding of the DEIS, we still wish to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

### **Protection of Air, Water, and Workers**

The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. As noted in previous comments we have submitted, semiconductor manufacturing is highly dependent on the use of thousands of hazardous chemicals, posing a serious risk to worker and community safety. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.

### **Affordable and Abundant Water and Energy**

The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.

### **Job Access, Housing & Transportation**

The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge housing demand for workers drawn to the area by the plant, but fails to address how the inevitable price pressure will affect those in lower cost market rate units. Therefore, the DEIS must address how Micron will work with state and county governments to expand the availability of mixed-income affordable, climate friendly, and safe housing while protecting affordability of existing housing for current residents.

### **Greenhouse Gases**

The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar – without relying on renewable energy credits or using renewable energy that is already on the grid – to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.

### **Water and Ecological Resources**

The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.

Sincerely,

Carl Kennebrew  
President, IUE-CWA

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**From:** Jonathan Kalmuss-Katz <jkalmusskatz@earthjustice.org>  
**Sent:** Monday, August 11, 2025 4:31 PM  
**To:** CHIPSNEPA@chips.gov; economicdevelopment@ongov.net; dep.r7@dec.ny.gov  
**Cc:** Alana Reynolds; Judith Barish; Donovan, Kate; ecogreenwolf@gmail.com  
**Subject:** [EXTERNAL] Comments on Micron Draft Environmental Impact Statement  
**Attachments:** 2025.08.11 - Micron DEIS Comments.pdf

On behalf of Chips Communities United, Earthjustice, Natural Resources Defense Council, and Sierra Club Atlantic Chapter, please find the attached comments on the Draft Environmental Impact Statement for the Micron New York Semiconductor Manufacturing Project. The comments address the impacts associated with Micron's use, release, and disposal of per- and per- and polyfluoroalkyl substances, and some of the signatories have submitted separate comments on other aspects of the DEIS.

For the convenience of OCIDA and the CHIPS Program Office, we are also submitting copies of many of the studies and materials cited in the comments, which can be downloaded from the following FTP link: <https://www.dropbox.com/scl/fo/xmo6f54e3juezmjue17n3/ALKWa3BAymX1TimFL7bMulM?rlkey=s2n11b8pqs4nx8cw0m4tsqhn4&st=b5jvfadj&dl=0>. Please include the submitted materials in the administrative record for the DEIS.

If you have any issues accessing the comments or the accompanying materials, please let me know.

Sincerely,  
Jon Kalmuss-Katz

Jonathan Kalmuss-Katz  
Senior Attorney, Toxic Exposure and Health  
Earthjustice  
48 Wall Street, 15<sup>th</sup> Floor  
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Pronouns: he/him/his  
[earthjustice.org](http://earthjustice.org)



The land on which our office sits is the homeland of the [Lenape Peoples](#). We recognize the Lenape as the traditional stewards of this stolen land and honor their continuing relationship with their territory.

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August 11, 2025

**Via Email**

Mr. Robert Petrovich,  
Executive Director  
Onondaga County Industrial Development Agency  
335 Montgomery Street, Floor 2M  
Syracuse, New York 13202

Ms. Lynelle McKay  
Director  
C.H.I.P.S. Program Office  
National Institute of Standards and Technology  
100 Bureau Drive  
Gaithersburg, MD 20899

Re: Draft Environmental Impact Statement for Micron Semiconductor Manufacturing  
Project, Clay, NY

Dear Mr. Petrovich and Ms. McKay:

Chips Communities United (“CCU”), along with Earthjustice, Natural Resources Defense Council, and Sierra Club Atlantic Chapter, submit these comments on the Draft Environmental Impact Statement (“DEIS”) for the Micron Semiconductor Manufacturing Project in Clay, New York (the “Project”). CCU is a national coalition of labor, environmental, social justice, civil rights, and community organizations dedicated to the socially and environmentally responsible development of the semiconductor industry. With \$280 billion in taxpayer dollars supporting domestic semiconductor manufacturing, including more than \$6 billion for the Project itself, CCU works to ensure that substantial public investment benefits workers, strengthens communities, and protects the environment. A necessary first step towards responsible semiconductor manufacturing is a comprehensive analysis of the environmental and social impacts of proposed manufacturing projects.

The National Environmental Policy Act (“NEPA”) and State Environmental Quality Review Act (“SEQRA”) require precisely that analysis. Those laws “require[] . . . agencies to take into account all environmental consequences of their projects before they decide to undertake them . . . as well as all possible and feasible mitigation measures.”<sup>1</sup> The “heart” of NEPA and SEQRA review is an environmental impact statement (“EIS”), a detailed assessment that “alert[s] responsible public officials to environmental changes before they have reached ecological points of no return.”<sup>2</sup>

The Project’s DEIS fails to meet those statutory requirements. These comments focus on one core shortcoming of the DEIS: the failure to take a hard look at the Project’s use, release, and

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<sup>1</sup> *Town of Henrietta v. N.Y. Dep’t of Env’t Conservation*, 76 A.D.2d 215, 221 (4th Dep’t 1980).

<sup>2</sup> *Id* at 220.

disposal of per- and polyfluoroalkyl substances (“PFAS”), as well as alternatives and mitigation measures that would prevent the significant adverse effects associated with PFAS.<sup>3</sup>

PFAS are a class of over 15,000 synthetic, long-lasting, and highly toxic chemicals. Often referred to as “forever chemicals” because of their extreme persistence in the environment, PFAS contaminate up to 45% of the nation’s tap water and the blood of nearly the entire U.S. population.<sup>4</sup> Many PFAS are linked to cancer, immunotoxicity, reproductive and developmental harm, and other serious health effects at even extremely low exposure levels. Despite these serious risks, PFAS remain widely used in the production of semiconductors, and the DEIS acknowledges that Micron would use and release PFAS.

However, the DEIS does not identify which PFAS Micron will use or specify how Micron plans to treat and dispose of its PFAS-containing waste. That information and other details about Micron’s PFAS releases are needed for the government to take a hard look at the Project’s environmental impacts and for the public to understand the extent and severity of the Project’s risk to human health and the environment. The DEIS also fails to consider alternatives that would minimize Micron’s PFAS use or mitigation measures that would prevent PFAS releases. Instead, it offers only noncommittal assurances that PFAS concerns will be handled in future permitting processes, deferring the evaluation and mitigation of significant adverse impacts without any certainty that such permits would even address PFAS releases. SEQRA and NEPA require more than the cursory acknowledgment of serious environmental concerns and wishful thinking about unspecified mitigation.

When the Project was announced in 2022, the State of New York, Onondaga County, and Micron pledged to make it “one of the most sustainable chip fabs in the world.”<sup>5</sup> We support that commitment, and the EIS should provide the roadmap for achieving it. With respect to PFAS, the Onondaga County Industrial Development Agency (“OCIDA”) and CHIPS Program Office of the Department of Commerce must identify all the ways the Project may use or release PFAS; require the use of safer, non-PFAS alternatives wherever available; and prohibit the environmental release of any PFAS that cannot be fully eliminated, including PFAS releases

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<sup>3</sup> Some of the signatories to these comments are submitting additional comments addressing other deficiencies in the DEIS. While these comments focus solely on PFAS, the Project will also use and release many other toxic chemicals, and the DEIS must fully evaluate and mitigate the unreasonable adverse effects from those releases as well.

<sup>4</sup> U.S. Geological Surv., *Tap Water Study Detected PFAS ‘Forever Chemicals’ Across the U.S.* (July 5, 2023), <https://www.usgs.gov/news/national-news-release/tap-water-study-detects-pfas-forever-chemicals-across-us>; Julianne Cook Botelho et al., *Per- and Polyfluoroalkyl Substances (PFAS) Exposure in the U.S. Population: NHANES 1999–March 2020*, 270 *Env’t Rsch. Art. No. 120916* (2025), <https://doi.org/10.1016/j.envres.2025.120916>.

<sup>5</sup> Resolution of New York Governor Kathy Hochul, U.S. Senate Majority Leader Charles E. Schumer, Onondaga County Executive Ryan McMahan, and Micron President & CEO Sanjay Mehrotra re: Oct. 4, 2022 announcement of Micron’s transformative \$100 billion investment to bring Micron semiconductor manufacturing to New York (Oct. 2022), [https://www.scribd.com/document/598753901/Micron-Resolution#from\\_embed](https://www.scribd.com/document/598753901/Micron-Resolution#from_embed).

from the Project’s industrial wastewater treatment plant (“IWWTP”). In these comments, we identify specific measures that would mitigate the significant, adverse impacts associated with the Project’s use, release, and disposal of PFAS. We urge OCIDA and other agencies to require those mitigation measures, among others, as conditions in their respective SEQRA Findings Statements.

## **I. The Release of PFAS from Semiconductor Manufacturing Presents Significant Adverse Effects on Human Health and the Environment**

### **A. PFAS Cause Significant Adverse Effects on Human Health**

“For far too long, communities across the United States have been suffering from exposure to PFAS.”<sup>6</sup> PFAS do not occur naturally, and less than a century ago they did not exist.<sup>7</sup> Over the course of roughly one human lifespan, PFAS contamination has spread across the world, harming countless people and species.<sup>8</sup> In the United States, PFAS are estimated to contaminate the drinking water supplies for up to 200 million people,<sup>9</sup> and they are frequently detected in human blood, breast milk, and umbilical cord blood, contaminating fetuses in the womb.<sup>10</sup>

All PFAS share common characteristics that make them particularly dangerous to people and the environment. First, PFAS have one or more carbon-fluorine bonds, which is the strongest single bond in organic chemistry.<sup>11</sup> This “common structural feature . . . makes [PFAS] highly problematic,”<sup>12</sup> since once they are released to the environment PFAS can persist for

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<sup>6</sup> EPA, *PFAS Strategic Roadmap: EPA’s Commitments to Action 2021–2024* at 1 (Oct. 2021), [https://www.epa.gov/system/files/documents/2021-10/pfas-roadmap\\_final-508.pdf](https://www.epa.gov/system/files/documents/2021-10/pfas-roadmap_final-508.pdf).

<sup>7</sup> EPA, *Our Current Understanding of the Human Health and Environmental Risks of PFAS*, <https://www.epa.gov/pfas/our-current-understanding-human-health-and-environmental-risks-pfas> (“PFAS are a group of manufactured chemicals that have been used in industry and consumer products since the 1940s”) (last updated Nov. 26, 2024).

<sup>8</sup> Amy Linn, *Toxic Timeline: A Brief History of PFAS*, Searchlight New Mexico (Feb. 19, 2019), <https://searchlightnm.org/toxic-timeline-a-brief-history-of-pfas/>.

<sup>9</sup> David Q. Andrews & Olga V. Naidenko, *Population-Wide Exposure to Per- and Polyfluoroalkyl Substances from Drinking Water in the United States*, 12 *Env’t Sci. & Tech. Letters* 931 (2020), <https://pubs.acs.org/doi/10.1021/acs.estlett.0c00713>.

<sup>10</sup> Tom Perkins, *Forever Chemicals’ Detected In All Umbilical Cord Blood in 40 Studies*, *The Guardian* (Sept. 23, 2022), <https://www.theguardian.com/environment/2022/sep/23/forever-chemicals-found-umbilical-cord-blood-samples-studies> (“Toxic PFAS chemicals were detected in every umbilical cord blood sample across 40 studies conducted over the last five years,” spanning “nearly 30,000 samples.”).

<sup>11</sup> Teresa A. Unzner & Thomas Magauer, *Carbon–Fluorine Bond Activation for the Synthesis of Functionalized Molecules*, 56 *Tetrahedron Letters* 877 (2015), <https://www.sciencedirect.com/science/article/pii/S0040403915000489>.

<sup>12</sup> Ian T. Cousins et al., *The High Persistence of PFAS is Sufficient For Their Management as a Chemical Class*, 22 *Env’t Sci. Process Impacts* 2307 (2020), <https://pmc.ncbi.nlm.nih.gov/articles/PMC7784706/>.

decades or longer, increasing the risk of human or environmental exposures.<sup>13</sup> While PFAS vary in size, structure, and chemical composition, “all PFAS either are extremely persistent in the environment and biota or partially transform into extremely persistent PFAS.”<sup>14</sup>

Second, many PFAS bioaccumulate, or build up, in people and animals, meaning even low-level releases can result in significant long-term exposures and harm.<sup>15</sup> Because PFAS accumulate in living organisms faster than they can be eliminated, their concentrations often increase as they move up the food chain, with people exposed to high levels of PFAS from the consumption of contaminated fish or livestock.<sup>16</sup>

Third, PFAS are highly toxic. The health risks associated with PFAS are well established and broadly recognized by international scientific organizations,<sup>17</sup> federal and state regulatory agencies,<sup>18</sup> and other leading scientific bodies.<sup>19</sup> Many PFAS are associated with “significant and

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<sup>13</sup> Ian T. Cousins et al., *Why is High Persistence Alone a Major Cause of Concern?*, 21 *Env’t Sci. Process Impacts* 781, 785 (2019),

<https://pubs.rsc.org/en/content/articlelanding/2019/em/c8em00515j>.

<sup>14</sup> Carol F. Kwiatkowski et al., *Scientific Basis for Managing PFAS as a Chemical Class*, 7 *Env’t Sci. & Tech. Letters* 532, 535 (2020), <https://pubs.acs.org/doi/10.1021/acs.estlett.0c00255>; Simona Andreea Bălan et al., *Regulating PFAS as a Chemical Class under the California Safer Consumer Products Program*, 129 *Env’t Health Persps. Art. No. 25001*, \*2 (2021), <https://ehp.niehs.nih.gov/doi/epdf/10.1289/EHP7431>.

<sup>15</sup> Maria-Eleni Dimitrakopoulou et al., *Comprehensive Analysis of PFAS Presence from Environment to Plate*, 8 *NPJ Sci. Food* 80, 4 (2024), <https://www.nature.com/articles/s41538-024-00319-1> (“PFAS compounds possess a remarkable ability to bioaccumulate in organisms . . .”).

<sup>16</sup> *See id.*

<sup>17</sup> *See* United Nations Env’t Programme, *Risk Profile on Perfluorooctane Sulfonate*, Addendum to Report of the Persistent Organic Pollutants Review Committee on the Work of Its Second Meeting at 25–26 (Nov. 2006), <http://chm.pops.int/Portals/0/download.aspx?d=UNEP-POPS-POPRC.2-17-Add.5.English.PDF>; United Nations Env’t Programme, *Risk Profile on Pentadecafluorooctanoic Acid (PFOA, Perfluorooctanoic Acid), its Salts and PFOA-related Compounds*, Addendum to Report of the Persistent Organic Pollutants Review Committee on the Work of its Twelfth Meeting at 24–26 (Sept. 2016), <http://chm.pops.int/Portals/0/download.aspx?d=UNEP-POPS-POPRC.12-11-Add.2.English.PDF>.

<sup>18</sup> Agency for Toxic Substances & Disease Registry (“ATSDR”), *Toxicological Profile for Perfluoroalkyls* at 4–21, 26–29 (May 2021) (“PFAS Tox. Profile”), <https://www.atsdr.cdc.gov/toxprofiles/tp200.pdf>; Cal. Off. of Env’t Health Hazard Assessment, *Public Health Goals: Perfluorooctanoic Acid and Perfluorooctane Sulfonic Acid in Drinking Water (First Public Review Draft)* at 62–166 (July 2021), <https://oehha.ca.gov/sites/default/files/media/downloads/crn/pfoapfosphgdraft061021.pdf>; EPA, *PFAS National Primary Drinking Water Regulation*, 89 *Fed. Reg.* 32,532 (Apr. 26, 2024).

<sup>19</sup> Nat’l Acads. of Sci., Eng’g, & Med., *Guidance on PFAS Exposure, Testing, and Clinical Follow-Up* 6–8 (Nat’l Acads. Press 2022), <https://nap.nationalacademies.org/catalog/26156/guidance-on-pfas-exposure-testing-and-clinical->

diverse” adverse health effects that include cancer, liver disease, decreased fertility, high cholesterol, reduced vaccine response, and more.<sup>20</sup> These risks can arise from extremely low levels of PFAS exposure, at times below the levels at which PFAS can be detected in the environment.<sup>21</sup>

Studies have found that workers and communities who are exposed to PFOA—a PFAS previously used in semiconductor manufacturing, among other industries<sup>22</sup>—experience higher rates of thyroid disorders, decreased vaccine response, pregnancy-induced hypertension and preeclampsia, and multiple types of cancer.<sup>23</sup> Despite phasing out PFOA, semiconductor plants continue to use “short-chain” PFAS,<sup>24</sup> which are often associated with the same types of health effects as the long-chain PFAS they are used to replace.<sup>25</sup> In fact, some short-chain PFAS, including GenX, are considered more potent than many long-chain PFAS and are capable of causing harm at even lower levels of exposure.<sup>26</sup>

Because many PFAS have common health effects, people who are exposed to multiple PFAS may face greater risks of harm from these co-exposures. As EPA has explained, “PFAS have dose additive impacts.”<sup>27</sup> Indeed, studies have shown that exposure to PFAS mixtures alters critical biological processes in children and young adults that are associated with an increased

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[follow-up](#) (click “Download Free PDF”); *see also* Arlene Blum et al., *The Madrid Statement on Poly- and Perfluoroalkyl Substances (PFASs)*, 123 *Env’t Health Persps.* A107, A107 (2015), <https://ehp.niehs.nih.gov/doi/epdf/10.1289/ehp.1509934> (releasing statement of more than 250 scientists expressing “concern[] about the production and release into the environment of an increasing number of [PFAS]”).

<sup>20</sup> 88 Fed. Reg. at 18,643; EPA, *Our Current Understanding of the Human Health and Environmental Risks of PFAS*, <https://www.epa.gov/pfas/our-current-understanding-human-health-and-environmental-risks-pfas>.

<sup>21</sup> *See, e.g.*, EPA, *Interim Drinking Water Health Advisory: Perfluorooctanoic Acid* at 17 (June 2002), <https://www.epa.gov/system/files/documents/2022-06/interim-pfoa-2022.pdf> (finding that “any detectable level of PFOA or PFOS will result” in health risks).

<sup>22</sup> World Semiconductor Council (“WSC”), *Joint Statement of the 28<sup>th</sup> Meeting of the World Semiconductor Council* at 6 (June 6, 2024), <https://www.semiconductorcouncil.org/wp-content/uploads/2024/06/2024-WSC-Joint-Statement-FINAL.pdf#page=6>.

<sup>23</sup> EPA, *Health Effects Support Document for Perfluorooctanoic Acid (PFOA)*, [https://www.epa.gov/sites/default/files/2016-05/documents/pfoa\\_hesd\\_final-plain.pdf](https://www.epa.gov/sites/default/files/2016-05/documents/pfoa_hesd_final-plain.pdf).

<sup>24</sup> WSC, *Joint Statement of the 28<sup>th</sup> Meeting of the World Semiconductor Council* at 6.

<sup>25</sup> Cheryl Hogue, *Short-Chain and Long-Chain PFAS Show Similar Toxicity, US National Toxicology Program Says*, *Chem. & Eng’g News* (Aug. 24, 2019), <https://cen.acs.org/environment/persistentpollutants/Short-chain-long-chain-PFAS/97/i33>; Kwiatkowski et al. 2020.

<sup>26</sup> Silke Schmidt, *Truth in the Serum? Estimating PFAS Relative Potency for Human Risk Assessment*, 130 *Env’t Health Persps.* Art. No. 094001 (2022), <https://doi.org/10.1289/EHP11799>.

<sup>27</sup> 88 Fed. Reg. at 18,649–50.

risk of developmental disorders, cardiovascular disease, and many types of cancer.<sup>28</sup> Recent human birth cohort studies also report associations between exposures to multiple PFAS during pregnancy and adverse health outcomes, with co-exposures to multiple PFAS associated with even greater risks of gestational diabetes and altered glucose levels during pregnancy, altered levels of thyroid hormones in pregnant people and in newborns, and liver injury in children.<sup>29</sup>

PFAS already contaminate multiple sites in the vicinity of the Project, increasing the potential for cumulative exposures. There is known PFAS contamination at the Hancock Field Air National Guard Base in Syracuse.<sup>30</sup> There is also suspected PFAS contamination at the Oak Orchard Wastewater Treatment Plant site, where Micron intends to build the Project's new industrial wastewater treatment facility.<sup>31</sup> And there are multiple facilities in the area that are suspected of using or having used PFAS, including two airfields immediately south of the Project site.<sup>32</sup>

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<sup>28</sup> Jesse A. Goodrich et al., *Metabolic Signatures of Youth Exposure to Mixtures of Per- and Polyfluoroalkyl Substances: A Multi-Cohort Study*, 131 *Env't Health Persps.* Art. No. 27005 (2023), <https://ehp.niehs.nih.gov/doi/epdf/10.1289/EHP11372>.

<sup>29</sup> Guoqi Yu et al., *Environmental Exposure To Perfluoroalkyl Substances in Early Pregnancy, Maternal Glucose Homeostasis and the Risk of Gestational Diabetes: A Prospective Cohort Study*, 156 *Env't Int'l Art. No.* 106621, 1 (2021), <https://pubmed.ncbi.nlm.nih.gov/33984575/>; Blanca Sarzo et al., *Maternal Perfluoroalkyl Substances, Thyroid Hormones, and DIO Genes: A Spanish Cross-sectional Study*, 55 *Env't Sci. & Tech.* 11144 (2021), <https://pubs.acs.org/doi/10.1021/acs.est.1c01452>; Arash Derakhshan et al., *Association of Per- and Polyfluoroalkyl Substances with Thyroid Homeostasis During Pregnancy in the SELMA Study*, 167 *Env't Int'l Art. No.* 107420 (2022), <https://doi.org/10.1016/j.envint.2022.107420>; Richard Christian Jensen et al., *Higher Free Thyroxine Associated with PFAS Exposure in First Trimester. The Odense Child Cohort*, 212(Pt. D) *Env't Rsch.* Art. No. 113492 (2022), <https://doi.org/10.1016/j.envres.2022.113492>; Jianqiu Guo et al., *Umbilical Cord Serum Perfluoroalkyl Substance Mixtures in Relation to Thyroid Function of Newborns: Findings From Sheyang Mini Birth Cohort Study*, 273 *Chemosphere* Art. No. 129664 (2021), <https://doi.org/10.1016/j.chemosphere.2021.129664>; Nikos Stratakis et al., *Prenatal Exposure to Perfluoroalkyl Substances Associated With Increased Susceptibility to Liver Injury in Children*, 72 *Hepatology* 1758, 1758–70 (2020), [doi:10.1002/hep.31483](https://doi.org/10.1002/hep.31483).

<sup>30</sup> Air Nat'l Guard, *Final Site Inspection Report Air National Guard Phase II Regional Site Inspections for Per and Polyfluoroalkyl Substances Hancock Field Air National Guard Base Syracuse, New York* at ES-3–4 (Mar. 2019), <https://extapps.dec.ny.gov/data/DecDocs/734054/Report.HW.734054.2019-03-07.PFAS%20SI.pdf>.

<sup>31</sup> PFAS Exchange, *PFAS Sites and Community Resources: An Interactive Mapping Project from the PFAS-REACH Team*, [https://experience.arcgis.com/experience/12412ab41b3141598e0bb48523a7c940/page/Page-1?views=Presumptive-Contamination#data\\_s=id%3AdataSource\\_18-1926810e7cf-layer-5%3A445](https://experience.arcgis.com/experience/12412ab41b3141598e0bb48523a7c940/page/Page-1?views=Presumptive-Contamination#data_s=id%3AdataSource_18-1926810e7cf-layer-5%3A445).

<sup>32</sup> *Id.*; see also DEIS App. K Vol. 1, Solid Waste, Hazardous Waste, and Hazardous Materials, at K-9, [https://ongovd.com/wp-content/uploads/2025/06/Micron-Draft-EIS-Appendix-K\\_Vol\\_1.pdf](https://ongovd.com/wp-content/uploads/2025/06/Micron-Draft-EIS-Appendix-K_Vol_1.pdf).

## B. PFAS Cause Significant Adverse Effects on the Environment

In addition to their health risks, PFAS releases threaten widespread environmental harm, including to protected species in the vicinity of the Micron site. PFAS have been detected in more than 600 different animal species,<sup>33</sup> and “myriad . . . studies have found harm to wildlife from PFAS contamination.”<sup>34</sup> Long-term PFAS exposures are linked to the disruption of metabolic, immune, and endocrine function and to reduced reproduction across a broad range of species, “pos[ing] an additional risk to species already negatively impacted by . . . climate change, harvesting[,] habitat degradation,” and other stressors.<sup>35</sup> High levels of PFAS have been detected in bat guano,<sup>36</sup> suggesting potential impacts to three threatened or endangered bat species in the vicinity of the Micron site.<sup>37</sup> PFAS were also found in the nestlings of bald eagles collected from the Great Lakes region,<sup>38</sup> another endangered species that has been “documented nesting in the vicinity of the Oak Orchard Site” where Micron’s wastewater will be treated.<sup>39</sup>

PFAS also harm livestock and dairy production, threatening the “predominant agricultural land use in [Onondaga County].”<sup>40</sup> The impacts of PFAS first came to light when a West Virginia farmer sued DuPont after PFOA releases from a Parkersburg, West Virginia chemical plant killed hundreds of his cows.<sup>41</sup> High levels of PFAS have also been detected in the bodies and milk of

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<sup>33</sup> Env’t Working Gr., *EWG Study: Humans Serve As Sentinels For ‘Forever Chemicals’ Harm to Wildlife Health* (Sept. 26, 2023), <https://www.ewg.org/news-insights/news-release/2023/09/ewg-study-humans-serve-sentinels-forever-chemicals-harm-wildlife>.

<sup>34</sup> Am. Bird Conservancy et al., *Petition to EPA Seeking Cancellation and Suspension of Several Existing Registrations of Pesticide Ingredients that are PFAS Chemicals and Requiring Rulemaking Regarding PFAS Chemical Assessment and PFAS in Pesticide Containers* at 59 (2025), [https://www.epa.gov/system/files/documents/2025-07/pfas\\_pesticides-petition.pdf](https://www.epa.gov/system/files/documents/2025-07/pfas_pesticides-petition.pdf).

<sup>35</sup> Catharina Vendl et al., *Profiling Research on PFAS In Wildlife: Systematic Evidence Map and Bibliometric Analysis*, 5 *Ecological Sols. and Evidence Art.* No. e12292,2 (2024), <https://besjournals.onlinelibrary.wiley.com/doi/epdf/10.1002/2688-8319.12292>.

<sup>36</sup> Slawomir Gonkowski et al., *Assessment of Perfluoroalkyl Substances Concentration Levels in Wild Bat Guano Samples*, 13 *Sci. Reps.* Art. No. 22707 (2023), <https://www.nature.com/articles/s41598-023-49638-5>.

<sup>37</sup> DEIS at 3-109.

<sup>38</sup> Sean M. Strom et al., *Longitudinal Trends of per- and Poly-Fluoroalkyl Substances (PFAS) In Nestling Bald Eagles (*Haliaeetus Leucocephalus*) from Wisconsin*, 276 *Env’t Rsch.* Art. No. 121468 (2025), <https://www.sciencedirect.com/science/article/abs/pii/S0013935125007194>.

<sup>39</sup> DEIS at 3-112.

<sup>40</sup> Onondaga Cnty. Agric. and Farmland Prot. Bd., *Onondaga County Agriculture & Farmland Protection Plan* at 33, 60 (Oct. 2022), <https://agriculture.ongov.net/wp-content/uploads/2022/11/Ag-Plan-Full-Plan-.pdf>.

<sup>41</sup> David Gelles & Emily Steel, *How Chemical Companies Avoid Paying for Pollution*, N.Y. Times (Oct. 20, 2021), <https://www.nytimes.com/2021/10/20/business/chemours-dupont-pfas-genx-chemicals.html>.

cattle that graze in PFAS-contaminated fields, forcing the closure of several family farms.<sup>42</sup>

### C. PFAS Are Hard to Remove, and Often Impossible to Fully Destroy, Using Traditional Treatment and Disposal Methods

Their unique chemical structure also makes PFAS difficult to treat and dangerous to dispose of. PFAS often pass through conventional wastewater treatment systems, resulting in additional discharges to the environment.<sup>43</sup> Studies have found concentrations of PFAS in wastewater treatment plant effluent that is “similar to those in [influent] samples,” indicating “minimal PFAS removal during [wastewater treatment plant] treatments.”<sup>44</sup> In many circumstances, PFAS concentrations “increased rather than decreased . . . during treatment,” as PFAS precursors transform into new PFAS during the treatment process.<sup>45</sup> Conventional water and wastewater treatment technologies, such as biological oxidation, coagulation/flocculation, chemical oxidation, and ultraviolet radiation “are inadequate for removing PFAS.”<sup>46</sup> Other treatment technologies—such as the use of granular activate carbon—are less effective at removing the short-chain PFAS that are most widely used in semiconductor manufacturing.<sup>47</sup> As a result, PFAS are widely detected in wastewater effluent and surface water downstream from

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<sup>42</sup> Alejandra Martinez, *Texas Farmers Say Sewage-Based Fertilizer Tainted With “Forever Chemicals” Poisoned Their Land and Killed Their Livestock*, The Tex. Trib. (Dec. 2, 2024), <https://www.texastribune.org/2024/12/02/texas-farmers-pfas-forever-chemicals-biosolids-fertilizer/>.

<sup>43</sup> See Mariam Elgamal et al., *Modeling PFAS in Semiconductor Manufacturing to Quantify Trade-offs in Energy Efficiency and Environmental Impact of Computing Systems* at \*2 (2025), <https://arxiv.org/pdf/2505.06727> (“Recent studies show that wastewater treatment plants do not fully remove or eradicate PFAS from semiconductor fabrication facilities wastewater.”).

<sup>44</sup> Juhee Kim et al., *Occurrence, Fate, and Removal of Per- and Polyfluoroalkyl Substances (PFAS) in Small- and Large-Scale Municipal Wastewater Treatment Facilities in the United States*, 4 ACS ES&T Water 5428, 5432 (2024), <https://pubs.acs.org/doi/10.1021/acsestwater.4c00541>.

<sup>45</sup> Ruyle et al., *High Organofluorine Concentrations in Municipal Wastewater Affect Downstream Drinking Water Supplies for Millions of Americans*, 122 Proc. Nat’l. Acads. Sci. Art. No. e2417156122, 3 (2025), <https://www.pnas.org/doi/epdf/10.1073/pnas.2417156122>.

<sup>46</sup> Javier López-Vázquez et al., *Insights into the Application of the Anodic Oxidation Process for the Removal of Per- and Polyfluoroalkyl Substances (PFAS) in Water Matrices*, 482 Chem. Eng’r J. 148925 at \*2 (Feb. 2024), <https://www.sciencedirect.com/science/article/pii/S1385894724004108>.

<sup>47</sup> EPA, *Perfluoroalkyl and Polyfluoroalkyl Substances (PFAS) Technologies for Reducing PFAS in Drinking Water*, Sci. in Action at 1 (2019), [https://www.epa.gov/sites/default/files/2019-10/documents/pfas\\_drinking\\_water\\_treatment\\_technology\\_options\\_fact\\_sheet\\_04182019.pdf](https://www.epa.gov/sites/default/files/2019-10/documents/pfas_drinking_water_treatment_technology_options_fact_sheet_04182019.pdf) (“[S]horter chain PFAS like perfluorobutanesulfonic acid (PFBS) and perfluorobutyrate (PFBA) do not adsorb as well [to GAC filters] resulting in earlier breakthrough.”).

wastewater treatment plants.<sup>48</sup>

Even the successful removal of PFAS from wastewater creates waste products—such as spent carbon filters or reverse osmosis concentrate—with high PFAS concentrations.<sup>49</sup> Biosolids from wastewater treatment plants also contain high levels of PFAS.<sup>50</sup> The disposal of these treatment residuals presents further problems. Biosolids are often applied to agricultural land as fertilizer, contaminating an estimated 20 million acres of farmland across the country.<sup>51</sup>

Traditional means of waste disposal do not effectively contain or destroy PFAS. Because of their extreme persistence, PFAS do not break down in landfills, making them likely to leach into the soil and groundwater or to volatilize and enter the air.<sup>52</sup> EPA scientists have estimated that municipal solid waste landfills alone release more than 130 kilograms of PFAS into the environment each year, a dangerously high amount for chemicals that can cause harm in the parts-per-trillion or parts-per-quadrillion range.<sup>53</sup> PFAS were also detected at 96% of inactive landfills in New York State, many of which have impacted local drinking water sources or private wells.<sup>54</sup>

The incineration of PFAS waste presents similar concerns. PFAS have been widely used in firefighting foam precisely because they do not break down when burned. Those same

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<sup>48</sup> Waterkeeper All., *PFAS Report Phase II: Uncovering PFAS Contamination in Frontline Communities* at 10–11 (June 2025),

<https://drive.google.com/file/d/1LGKXuZIHcXMuj5z9IOtiWvDMcxNzI-c7/view>.

<sup>49</sup> John Wiegand, *The Race to Destroy PFAS, the Forever Chemicals*, MIT Tech. Rev. (Oct. 26, 2023), <https://www.technologyreview.com/2023/10/26/1082292/the-race-to-destroy-pfas-the-forever-chemicals/> (explaining that, when wastewater treatment filters are discarded or reused, “the notoriously clingy PFAS reenter the environment through landfills and wastewater.”).

<sup>50</sup> Shubhashini Oza et al., *Surveillance of PFAS in Sludge and Biosolids at 12 Water Resource Recovery Facilities*, 54 J. Env’t Quality 6, 17 (2023), <https://access.onlinelibrary.wiley.com/doi/epdf/10.1002/jeq2.20595>.

<sup>51</sup> Tom Perkins, ‘Forever Chemicals’ May Have Polluted 20m Acres of US Cropland, Study Says (May 8, 2022), <https://www.theguardian.com/environment/2022/may/08/us-cropland-may-be-contaminated-forever-chemicals-study>.

<sup>52</sup> Huiju Lin et al., *Per- and Polyfluoroalkyl Substances in the Atmosphere of Waste Management Infrastructures: Uncovering Secondary Fluorotelomer Alcohols, Particle Size Distribution, and Human Inhalation Exposure*, 167 Env’t Int’l Art. No. 107434 (2022),

<https://www.sciencedirect.com/science/article/pii/S0160412022003610?via%3Dihub>; Fabrizio Sabba et al., *PFAS in Landfill Leachate: Practical Considerations for Treatment and Characterization*, 481 J. Hazardous Materials Art. No. 136685 (2025), <https://www.sciencedirect.com/science/article/pii/S0304389424032667>.

<sup>53</sup> Thabet Tolaymat et al., *A Critical Review of Perfluoroalkyl And Polyfluoroalkyl Substances (PFAS) Landfill Disposal in the United States*, 905 Sci. Total Env’t Art. No. 167185, 38 (2023), <https://doi.org/10.1016/j.scitotenv.2023.167185>.

<sup>54</sup> N.Y. State Dep’t of Env’t Conservation (“NYDEC”), *New York State Inactive Landfill Initiative: Comprehensive Plan to Address Priority Solid Waste Sites for Potential Impacts on Drinking Water Quality* at 1–3 (July 2025), [https://dec.ny.gov/sites/default/files/2025-07/inactivelandfillrpt2025\\_0.pdf](https://dec.ny.gov/sites/default/files/2025-07/inactivelandfillrpt2025_0.pdf).

properties make PFAS extremely difficult to incinerate, and EPA has acknowledged that “the effectiveness of incineration to destroy PFAS compounds . . . is not well understood.”<sup>55</sup> The incomplete combustion of PFAS “can result in the formation of smaller PFAS,” as well as other toxic chemicals like hydrogen fluoride. These products of incomplete combustion are then released with any residual PFAS via the incinerator’s air emissions, “spread[ing] them into surrounding areas.”<sup>56</sup>

#### **D. PFAS Are Widely Used and Released During Semiconductor Manufacturing**

PFAS are widely used and frequently released during the production of semiconductors.<sup>57</sup> “The primary use of PFAS in semiconductor manufacturing is in photolithography,” a process in which ultraviolet light is filtered through photoacid generators to imprint circuit patterns onto a semiconductor wafer.<sup>58</sup> PFAS are widely used as photoacid generators, and during this process less than 1% of PFAS used remain on the chip, with the majority either disposed of in wastewater or incinerated.<sup>59</sup>

PFAS gases are also used in the etching step of semiconductor production, during which excess material is removed from the semiconductor wafer to create the desired structure.<sup>60</sup> During deposition, additional PFAS are used to apply additional layers of material to the wafer.<sup>61</sup> The European Semiconductor Industry Association estimated nearly 12,900 kg of gaseous PFAS releases from European semiconductor facilities in a single year.<sup>62</sup>

It is therefore unsurprising that the DEIS found that “PFAS may be present in [Micron’s] process-related wastewater.”<sup>63</sup> The DEIS does not disclose which PFAS may be present in

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<sup>55</sup> EPA, *Technical Brief, Per- and Polyfluoroalkyl Substances (PFAS): Incineration to Manage PFAS Waste Streams* at 2 (Feb. 2020), [https://www.epa.gov/sites/default/files/2019-09/documents/technical\\_brief\\_pfas\\_incineration\\_ioaa\\_approved\\_final\\_july\\_2019.pdf](https://www.epa.gov/sites/default/files/2019-09/documents/technical_brief_pfas_incineration_ioaa_approved_final_july_2019.pdf)

<sup>56</sup> Cheryl Hogue, *Incineration May Spread, Not Break Down PFAS*, Chem. & Eng’g News (Apr. 27, 2020), <https://cen.acs.org/environment/persistent-pollutants/Incinerators-spread-break-down-PFAS/98/web/2020/04> (describing elevated PFAS levels in the soil around a Cohoes, New York incinerator); Noémi Brunschwiler, *Tracing Sources of Diffuse PFAS Contamination in Soil Near A Waste Incineration Plant*, TNO at 39 (June 30, 2023), <https://publications.tno.nl/publication/34641491/qr1mfT/TNO-2023-S11566.pdf> (reporting elevated PFAS levels in soil downwind of a Netherlands waste incinerator and concluding “the waste incinerator was . . . likely a substantial contributor to the observed PFAS content”).

<sup>57</sup> Programmatic EA at C-13–15.

<sup>58</sup> Elgamal et al. 2025 at 2.

<sup>59</sup> *Id.*

<sup>60</sup> *Id.*

<sup>61</sup> *Id.* at 3.

<sup>62</sup> Eur. Semiconductor Indus. Ass’n, *Per- and Polyfluoroalkyl Substances (PFAS) ESIA Comments on the Annex XV Restriction Report* at 3 (Sept. 21, 2023), [https://www.eusemiconductors.eu/sites/default/files/uploads/20230921\\_FinalESIASubmission-PFASConsultation.pdf](https://www.eusemiconductors.eu/sites/default/files/uploads/20230921_FinalESIASubmission-PFASConsultation.pdf).

<sup>63</sup> DEIS at 3-239.

Micron’s wastewater nor the likely concentration of total PFAS. However, based on information from other semiconductor manufacturing sites and found in the CHIPS facilities’ programmatic EA,<sup>64</sup> it is likely that many PFAS will be used at the Micron site and, absent strict restrictions, released into the environment. For example, at least 17 different PFAS have been detected in the wastewater discharged by the Global Foundries semiconductor manufacturing facility in Essex Junction, Vermont.<sup>65</sup> Up to 78,000 parts-per-trillion of PFAS were detected in another study of another domestic semiconductor plant’s wastewater, more than 20,000 times higher than New York State’s water quality guidance value for PFOS.<sup>66</sup>

#### **E. The DEIS Must Use a Broad, Science-Based Definition of the PFAS Class**

As acknowledged in the DEIS, the assessment and regulation of PFAS “depend[s]” in large part “on the definition of PFAS applied.”<sup>67</sup> The New York Legislature,<sup>68</sup> United States Congress,<sup>69</sup> more than 100 leading scientists,<sup>70</sup> and 16 state attorneys general<sup>71</sup> have all defined

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<sup>64</sup> Nat’l Inst. of Standards & Tech. CHIPS Program Off. et al., *Final Programmatic Environmental Assessment for Modernization and Expansion of Existing Semiconductor Fabrication Facilities under the CHIPS Incentives Program* at D-2-13 (June 28, 2024) (“Programmatic EA”), <https://www.nist.gov/system/files/documents/2024/06/28/Final%20PEA%20for%20Modernization%20and%20Expansion%20of%20Semiconductor%20Fabs%206-28-2024%20-%20OGC-508C.pdf> (listing representative chemicals used by the semiconductor industry).

<sup>65</sup> Sierra Club, *Community Groups Voice Concern over PFAS Discharges from GlobalFoundries Factory in Vermont* (Aug. 27, 2024), <https://www.sierraclub.org/press-releases/2024/08/community-groups-voice-concern-over-pfas-discharges-globalfoundries-factory>.

<sup>66</sup> Tom Perkins, *US Environmental Agency Fast-Tracking New PFAS Approvals for Semiconductors*, *The Guardian* (Dec. 19, 2024), <https://www.theguardian.com/us-news/2024/dec/19/epa-pfas-approvals-semiconductors>; NYDEC, *Water Quality Standards and Classifications*, <https://dec.ny.gov/environmental-protection/water/water-quality/standards-classifications> (last accessed Aug. 6, 2025).

<sup>67</sup> DEIS at 3-239.

<sup>68</sup> See, e.g., N.Y. Env’t Conserv. Law (“ECL”) §§ 37-0203(6), 37-0101(7), 27-3301(8) (McKinney 2024); N.Y. Gen. Bus. Law § 391-u(1)(f) (McKinney 2024).

<sup>69</sup> See, e.g., National Defense Authorization Act for Fiscal Year 2020, Pub. L. No. 116-92, § 332(c)(3), 133 Stat. 1198, 1314 (2019) (defining PFAS as “substances that are man-made chemicals with at least one fully fluorinated carbon atom”); see also *id.* § 329(b)(2), 133 Stat. at 1312 (defining “polyfluoroalkyl substance” as “a man-made chemical containing a mix of fully fluorinated carbon atoms, partially fluorinated carbon atoms, and nonfluorinated carbon atoms”).

<sup>70</sup> Safer States, *Scientists’ Statement on Defining PFAS* at \*1 (May 7, 2024), <https://www.saferstates.org/wp-content/uploads/Scientists-Statement-on-Defining-PFAS.pdf> (“Scientists’ Statement on Defining PFAS”). The Scientists’ Statement also expresses support for the OECD’s similar definition of the PFAS class, discussed below.

<sup>71</sup> State Att’y’s General of N.J. et al., *Comments on TSCA Section 8(a)(7) Reporting and*

PFAS as a class of chemicals containing “at least one fully fluorinated carbon [atom].” This definition has broad scientific support, since it is the presence of a fully fluorinated carbon that gives PFAS their common trait of persistence. We encourage OCIDA to adopt that science-based PFAS definition, which is already enshrined in multiple provisions of New York State law.

The DEIS references another PFAS definition from the Organisation for Economic Co-operation and Development (“OECD”).<sup>72</sup> The OECD defines PFAS as “fluorinated substances that contain at least one fully fluorinated methyl or methylene carbon atom (without any H/Cl/Br/I atom attached to it).”<sup>73</sup> While slightly narrower than the definition referenced above, the OECD definition covers most substances with at least one fully fluorinated carbon atom.<sup>74</sup>

Both of those definitions are preferable to the narrower and scientifically unsupported PFAS definitions that the United States Environmental Protection Agency has adopted in the past.<sup>75</sup> While EPA claims to define the PFAS class on a “case-by-case basis,” as opposed to relying on a single consistent definition, prior EPA definitions have excluded thousands of PFAS recognized by the OECD, New York State, and others.<sup>76</sup> These exclusions have no scientific basis, and they could exclude many PFAS that are used or formed in semiconductor manufacturing. For instance, EPA’s prior definitions did not include polyvinylidene fluoride (“PVDF”), a PFAS used in semiconductor manufacturing,<sup>77</sup> or trifluoroacetic acid (“TFA”), which has been detected in semiconductor wastewater.<sup>78</sup> To fully assess the Project’s PFAS impacts, the DEIS must use a definition that encompasses the full PFAS class.

## **II. NEPA and SEQRA Require the Government to Take a Hard Look at The Project’s Environmental Impacts and Potential Alternatives and Mitigation Measures**

The National Environmental Policy Act (“NEPA”) and the State Environmental Quality Review Act (“SEQRA”) operate at the federal and state level, respectively, to ensure that agencies closely examine, disclose, and mitigate the environmental consequences of significant

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*Recordkeeping Requirements for Perfluoroalkyl and Polyfluoroalkyl Substances (PFAS)*, EPA Doc. No. EPA-HQ-OPPT-2020-0549-0092 at 6–7 (Sept. 27, 2021), <https://www.regulations.gov/comment/EPA-HQ-OPPT-2020-0549-0086> (click “Download”).

<sup>72</sup> DEIS at 3-239.

<sup>73</sup> *Id.* at 3-239 to 3-240.

<sup>74</sup> *See Scientists’ Statement on Defining PFAS* at \*1.

<sup>75</sup> *Id.* (supporting “one fully fluorinated carbon” and OECD definitions).

<sup>76</sup> Tom Perkins, *EPA’s New Definition of PFAS Could Omit Thousands of ‘Forever Chemicals’*, *The Guardian* (Aug. 18, 2023), <https://www.theguardian.com/environment/2023/aug/18/epa-new-definition-pfas-forever-chemicals>.

<sup>77</sup> Programmatic EA at C-25; *Scientists Comments on TSCA Section 8(a)(7) Reporting and Recordkeeping Requirements for Perfluoroalkyl and Polyfluoroalkyl Substances (PFAS)*, EPA Doc. No. EPA-HQ-OPPT-2020-0549-0086 at 6–7 (Sept. 27, 2021), <https://www.regulations.gov/comment/EPA-HQ-OPPT-2020-0549-0089>.

<sup>78</sup> Boris Draz et al., *Practical Guidance on Selecting Analytical Methods for PFAS in Semiconductor Manufacturing Wastewater*, *ACS Measurement Sci. Art. No. 5c00021,4* (2025), [https://pubs.acs.org/doi/pdf/10.1021/acsmeasuresciau.5c00021?ref=article\\_openPDF](https://pubs.acs.org/doi/pdf/10.1021/acsmeasuresciau.5c00021?ref=article_openPDF).

projects. NEPA “promotes [a] sweeping commitment to ‘prevent or eliminate damage to the environment and biosphere’ by focusing Government and public attention on the environmental effects of” the proposed facility.<sup>79</sup>

SEQRA, which applies to New York state and local agencies, “is modeled upon” NEPA.<sup>80</sup> But “unlike its Federal counterpart . . . SEQRA is not merely a disclosure statute; it imposes far more action-forcing or substantive requirements on state and local decisionmakers than NEPA imposes on their federal counterparts.”<sup>81</sup> Passed in 1975, the New York State Environmental Quality Review Act “makes environmental protection a concern of every agency.”<sup>82</sup> The NY legislature’s purpose in enacting SEQRA was to “encourage productive and enjoyable harmony between man and his environment; to promote efforts which will prevent or eliminate damage to the environment and enhance human and community resources; and to enrich the understanding of the ecological systems, natural, human and community resources important to the people of the state.”<sup>83</sup> Further, all agencies were to “conduct their affairs with awareness that they are stewards of the air, water, land, and living resources,” and with awareness “that they have an obligation to protect the environment for the use and enjoyment of this and all future generations.”<sup>84</sup> As part of this duty, the “activities of . . . corporations” are to be regulated such that “due consideration is given to preventing environmental damage.”<sup>85</sup>

SEQRA requires the preparation of an environmental impact statement (“EIS”) for “any action which may have significant effect on the environment.”<sup>86</sup> Providing the “[o]ppportunity for public participation and engagement is an essential and mandatory part of the SEQRA process.”<sup>87</sup> Through this process “SEQRA insures that agency decision-makers—enlightened by public comment where appropriate—will identify and focus attention on any environmental impact of proposed action,” “balance those consequences against other relevant social and economic considerations,” “articulate the bases for their choices,” and “minimize adverse environmental effects to the maximum extent practicable.”<sup>88</sup>

Additionally, following the enactment of the Green Amendment, which took effect on January 1, 2022, New York residents are each constitutionally entitled “to clean air and water, and a healthful environment.”<sup>89</sup> Though legal interpretations of the provision’s meaning are nascent, courts have begun exploring the necessity of “more demanding” standards of review for

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<sup>79</sup> *Marsh v. Oregon Nat. Res. Council*, 490 U.S. 360, 371 (1989) (citation omitted).

<sup>80</sup> *Coal. Against Lincoln W., Inc. v. New York*, 94 A.D.2d 483, 485 (1st Dep’t 1983), *aff’d*, 60 N.Y.2d 805, 457 N.E.2d 795 (1983).

<sup>81</sup> *Jackson v. New York State Urb. Dev. Corp.*, 67 N.Y.2d 400, 415 (1986) (internal quotations omitted).

<sup>82</sup> *Id.* at 414.

<sup>83</sup> N.Y. ECL § 8-0101 (McKinney 2025).

<sup>84</sup> *Id.* § 8-0103(8).

<sup>85</sup> *Id.* § 8-0103(9).

<sup>86</sup> *Boise v. City of Plattsburgh*, 219 A.D.3d 1050, 1056 (3d Dep’t 2023).

<sup>87</sup> *Id.* at 1057 (citation omitted).

<sup>88</sup> *New York State Urb. Dev. Corp.*, 67 N.Y.2d at 414–15.

<sup>89</sup> N.Y. Const. art. I, § 19.

SEQRA actions.<sup>90</sup> The Amendment “exists to challenge laws, activities, or proposed actions that pose significant threats to the environment” by “provid[ing] an independent cause of action that may be applicable to the government’s failures to protect New Yorkers from contaminated drinking water, polluted air, pollutants, extreme weather and climate change events.”<sup>91</sup>

### A. Contents of an Environmental Impact Statement

An EIS under SEQRA must include, among other topics, “a description of the proposed action, its environmental impact[,] and mitigation measures proposed to minimize the environmental impact.”<sup>92</sup> “SEQRA requires an EIS to set forth ‘any adverse environmental effects which cannot be avoided should the proposal be implemented.’”<sup>93</sup>

Under both SEQRA and NEPA, an EIS is required to provide substantive discussion of a range of reasonable project alternatives and their comparative environmental impacts.<sup>94</sup> SEQRA ultimately requires agencies to “choose alternatives which, consistent with social, economic[,] and other essential considerations . . . minimize or avoid adverse environmental effects” to “the maximum extent practicable.”<sup>95</sup> As a result, the DEIS must “go beyond mere assertions and provide sufficient data and reasoning to enable a reader to evaluate the analysis and conclusions.”<sup>96</sup>

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<sup>90</sup> *Friends of Fort Greene Park v. N.Y. City Parks and Recreation Dept.*, No. 25151, slip op. at 28 (N.Y. Sup. Ct. July 1, 2025) (“This Court would propose a three-part test . . . utilizing intermediate scrutiny as follows: First, did the government action comply with the applicable statute? Second, did the government action violate a person’s constitutional ‘right to clean air and water, and a healthful environment’? Third, if there is a constitutional violation, can the government show that the plan is justified by an important interest that is substantially related and proportionate to action the government has taken.”); *See also* Olivia Schragar, *State Administrative Constitutionalism and Environmental Rights: Judicial Review and New York’s Green Amendment*, 50 Colum. J. Env’t. L. 175, 182–83 (2025), <https://doi.org/10.52214/cjel.v50i1.13316>.

<sup>91</sup> *Friends of Fort Greene Park.*, slip op. at 30; *see also id.* at 17 (citing Katrina Fischer Kuh et al., *New York’s Constitutional Guarantee of Environmental Rights*, 27 N.Y.U. J. Legis. & Pub. Pol’y 361, 386–87 (2025)) (“Proponents characterized the amendment as significant and expressed the view that it would advance broad goals—rectify environmental justice; improve environmental public health provide citizens with more voice and stronger levers to challenge government action and improve government decision making; tilt the scales in favor of environmental and human health over industrial interests . . . proponents of the amendment clearly understood it to be a vehicle for effecting real change, motivated by a conviction that the existing framework of environmental law in New York had serious limitations.”).

<sup>92</sup> *Boise*, 219 A.D.3d 1056–57.

<sup>93</sup> *Town of Henrietta*, 76 A.D.2d at 221.

<sup>94</sup> N.Y. Comp. Codes R. & Regs. tit. 6 § 617.9(b)(5)(v) (2018); 42 U.S.C. 4332(C)(iii).

<sup>95</sup> *New York State Urb. Dev. Corp.*, 67 N.Y.2d at 416 citing to N.Y. ECL § 8–0109(1) (McKinney 2025).

<sup>96</sup> *Nat. Res. Def. Council, Inc. v. Callaway*, 524 F.2d 79, 93 (2d Cir. 1975) (internal citations omitted).

Similarly, the mitigation measures adopted by the lead agency in response to the DEIS must address environmental harms caused by the project to the “maximum extent practicable.”<sup>97</sup> “SEQRA requires an approving agency to act affirmatively upon the adverse environmental impacts revealed in an EIS,” so that the EIS is “not a mere disclosure statement but rather . . . an aid in an agency’s decision-making process to evaluate and balance the competing factors.”<sup>98</sup> In so doing, “[l]ead agencies have the authority under [SEQRA] to impose mitigation measures on actions . . . that are otherwise outside its jurisdiction, or the jurisdiction of any other agency.”<sup>99</sup>

## **B. The “Hard Look” Standard**

A lead agency is required to take a “hard look” at the environmental consequences of a proposed project under both NEPA and SEQRA.<sup>100</sup> To do so “the lead agency must ‘thoroughly analyze the identified relevant areas of environmental concern to determine if the action may have a significant adverse impact on the environment.’”<sup>101</sup> Under SEQRA, “the requirement of environmental consideration to the fullest extent possible sets a high standard . . . enforced by the reviewing courts.”<sup>102</sup>

Ultimately, the “extent of detail required” in any given EIS “must necessarily be related to the complexity of the environmental problems created by the project.”<sup>103</sup> The DEIS must evaluate “the potential significant adverse environmental impacts *at a level of detail that reflects the severity of the impacts and the reasonable likelihood of their occurrence.*”<sup>104</sup> While an EIS need not, and cannot, realistically belabor every potential impact no matter how remote, areas of complex or extreme environmental concern must receive detailed treatment in an EIS.<sup>105</sup> A DEIS cannot rely on “general assurances” future actions will “adequately mitigate” recognized risks.<sup>106</sup>

## **C. Agencies May Not Defer NEPA or SEQRA Review to Subsequent Permitting Processes or Administrative Proceedings**

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<sup>97</sup> 6 N.Y.C.R.R. § 617.11(d)(5) (requiring agencies to certify that “adverse environmental impacts will be avoided or minimized to the maximum extent practicable by incorporating as conditions to the decision those mitigative measures that were identified as practicable.”).

<sup>98</sup> *Town of Henrietta*, 76 A.D.2d at 221–22.

<sup>99</sup> NYDEC, *The SEQR Handbook Fourth Edition*, Div. of Env’t Permits at 62 (Mar. 2020) (“NYDEC SEQR Handbook”),

[https://extapps.dec.ny.gov/docs/permits\\_ej\\_operations\\_pdf/seqrhandbook.pdf](https://extapps.dec.ny.gov/docs/permits_ej_operations_pdf/seqrhandbook.pdf).

<sup>100</sup> *Town of Huntington v. Marsh*, 859 F.2d 1134, 1143 (2d Cir. 1988); *Boise*, 219 A.D.3d at 1055 (citation omitted).

<sup>101</sup> *Clean Air Action Network of Glens Falls, Inc. v. Town of Moreau Plan. Bd.*, 235 A.D.3d 1124, 1127 (3rd Dept. 2025) (quoting 6 N.Y. C.C. R.R. § 617.7(b)(3)).

<sup>102</sup> *Town of Henrietta*, 76 A.D.2d at 223 (internal quotes omitted).

<sup>103</sup> *Id.* at 215, 224.

<sup>104</sup> 6 N.Y.C.C.R.R. § 617.9 (emphasis added).

<sup>105</sup> *Id.*

<sup>106</sup> *See H.O.M.E.S. v. New York State Urban Dev. Corp.*, 69 A.D.2d 222, 232 (4th Dept. 1979).

Logically, under SEQRA and NEPA, projects significant enough to trigger the preparation of an EIS often necessitate the issuance of environmental permits as well. NEPA and SEQRA generally require the environmental review process to be completed prior to the final issuance of such permits.<sup>107</sup> An agency is not free to simply defer an EIS’s site-specific disclosure of recognized environmental risks and mitigation needs to these future permitting or administrative proceedings. “Postponement of review of environmental impacts or reliance on tentative plans for future mitigation . . . is in violation of SEQRA.”<sup>108</sup> A “lead agency improperly defers its duties when it abdicates its SEQRA responsibilities to another agency or insulates itself from environmental decision[-]making,” and one of the ways it does so is by excluding detailed disclosure of known environmental impacts and mitigation plans from the EIS.<sup>109</sup>

Even where courts “recognize that the [facility] in question will be subject to ‘state and federal air permitting processes,’” and are willing to “assume that . . . emissions will be subject to” changing regulations at some future point, “the existence of permit requirements overseen by another federal agency or state permitting authority cannot substitute for a proper NEPA analysis.”<sup>110</sup> Similarly, under SEQRA specifically, even if elements of a site-specific EIS’s hazard management plans and permitting will be managed in future administrative proceedings, those permit applications or plans must be “subject to review as part of the SEQRA process,” in “some form” detailed enough to permit meaningful scrutiny, understanding, and mitigation determinations.<sup>111</sup>

For example, in *Boise v. City of Plattsburgh* the DEIS contemplated the use of a future, site-specific, health and safety plan to address the recognized risks posed by contaminated soil beneath the proposed project’s parking area.<sup>112</sup> Although the draft EIS “contemplated the implementation of” this future safety plan “to address risk” the plan was not actually “created and subject to review as part of the SEQRA process” in any form detailed enough to permit a “hard look” at its sufficiency or public “scrutiny” of the processes’ alleged mitigation of risks.<sup>113</sup> Ultimately, this vague description of future administrative processes the DEIS would allegedly rely on to mitigate a known environmental risk “demonstrates noncompliance with SEQRA” in both its failure to take a hard look at the problem and the failure of the lead agency to secure mitigation measures.<sup>114</sup> As the court in *Matter of Clean Air Action Network* similarly summarizes, there is no compliance with SEQRA where there is no “reasoned elaboration as to

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<sup>107</sup> 6 N.Y.C.C.R. § 617.3(a); N.Y. ECL § 8-0105 (McKinney2025).

<sup>108</sup> *Brander v. Town of Warren Town Bd.*, 18 Misc. 3d 477, 484 (Sup. Ct. 2007).

<sup>109</sup> *Boise*, 219 A.D.3d at 1057–58 (citation omitted); see *Bronx Comm. for Toxic Free Sch. v. New York City Sch. Const. Auth.*, 86 A.D.3d 401, 402–03 (1st Dept. 2011) (“Respondents contend that . . . it could appropriately defer consideration of long-term monitoring measures until the completion of remediation . . . under SEQRA it was impermissible . . . to omit a known remediation issue from the EIS with the idea of taking up that issue at a later date.”)

<sup>110</sup> *Sierra Club v. FERC*, 867 F.3d 1357, 1375 (D.C. Cir. 2017)); *Clean Air Action Network of Glens Falls*, 235 A.D.3d at 1228 (applying the same principle under SEQRA).

<sup>111</sup> *Boise*, 219 A.D.3d at 1058; see *Bronx Comm. for Toxic Free Sch.*, 86 A.D.3d at 402–03.

<sup>112</sup> *Boise*, 219 A.D.3d at 1058.

<sup>113</sup> *Id.* at 1058–59.

<sup>114</sup> *Id.* at 1060.

why the issuance of a state facility permit negates the potential adverse impacts” or results in “no significant adverse environmental impact” from the proposed facility’s hazardous emissions.<sup>115</sup>

In sum, site-specific EISs must go beyond general assurances and provide information on permits and plans, particularly where the EIS relies on these processes as an answer to a project’s known environmental threats. One of the many purposes of taking a “hard look” in the EIS is “ensur[ing] that the agency will not act on incomplete information, only to regret its decision after it is too late.”<sup>116</sup> Deferring review of a project’s hazardous pollutant exposure risks and control plans until after the SEQRA process is concluded may result in an agency’s failure to secure feasible mitigation measures for recognized environmental harms in contravention of SEQRA.<sup>117</sup> And if an agency is free to defer analysis of key impacts and mitigation until the permitting stage, after they have already committed resources to the project and in some instances started construction, it will often be too late to truly inform the agency’s selection among alternatives and mitigation options. To that end, “deferring resolution of . . . hazardous waste remediation issue[s]” to subsequent administrative proceedings is inappropriate and can result in “fail[ure] to take the requisite hard look at” areas of “recognized environmental concern” under SEQRA.<sup>118</sup>

### **III. The DEIS Fails to Take a Hard Look at the Effects of Micron’s PFAS Releases**

The Project’s DEIS does not provide enough detail on Micron’s use, disposal, and release of PFAS for the public to understand the Project’s environmental and human health impacts. Because the scope and severity of the anticipated impacts are not disclosed, the mitigation needed to ensure health protective control of PFAS at the proposed facility remains unclear. These gaps exist across the DEIS’s analysis of: (1) PFAS in wastewater, (2) PFAS in air

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<sup>115</sup> *Clean Air Action Network of Glens Falls.*, 235 A.D.3d at 1128.

<sup>116</sup> *Marsh v. Oregon Nat. Res. Council*, 490 U.S. at 371.

<sup>117</sup> E.g. *Boise*, 219 A.D.3d at 1058.

<sup>118</sup> *Penfield Panorama Area Cmty., Inc. v. Town of Penfield Plan. Bd.*, 253 A.D.2d 342, 349–50 (4th Dept. 1999) (finding failure to take a hard look where “the Planning Board improperly deferred resolution of the hazardous waste remediation issue.”); *Boise*, 219 A.D.3d at 1058 (“[T]he issue is the deferral of the creation of a HASP, the necessity of which is imminent given that this project expressly contemplates excavation, to mitigate exposure to the contaminated soil.”); see also *Fisher v. Giuliani*, 280 A.D.2d 13, 22 (1st Dept. 2001) (finding legal “error” where the Department of City Planning “defer[ed] its analysis” of zoning amendments, since “the mere fact that environmental review may be required at the time an applicant seeks a special permit does not, by itself, obviate the CPC’s obligation to consider possible environmental impact.”); *H. O. M. E. S.*, 69 A.D.2d at 232 (review “failed to take a ‘hard look’ at the problems and adverse potential effects of the project . . . where it vaguely recognized their existence and relied upon general assurances” the problem would be adequately mitigated “by some unspecified appropriate action.”); *Bronx Comm. for Toxic Free Sch.*, 86 A.D.3d at 402–03; *Town of Huntington*, 859 F.2d at 1143 (explaining NEPA EIS discussion of site designation is not distinct from permitting and it is “improper to defer [EIS] analysis of the type, quantities and cumulative effects of waste” involved in proposed project.).

emissions, (3) disposal of PFAS contaminated media, (4) PFAS in drinking water, and 5) PFAS impacts on local ecosystems and species of concern.

## **A. The DEIS Fails to Take a Hard Look at the Impacts of PFAS in Wastewater**

### **1. PFAS Content of Wastewater**

Regarding the specific PFAS compounds the facility will use, the DEIS states only that Micron will 1) independently request such information at a later date, subject to nondisclosure agreements and 2) comply with federal reporting requirements for PFAS listed on the Toxics Release Inventory (“TRI”).<sup>119</sup> A wide array of PFAS compounds are routinely found in semiconductor wastewater influent or effluent,<sup>120</sup> and the DEIS confirms “PFAS may be present in process-related wastewater” at the proposed facility.<sup>121</sup> The Programmatic Environmental Assessment for CHIPS semiconductor facilities correctly concludes that “[w]astewater discharge from semiconductor fabrication facilities presents a substantial risk for PFAS contamination of the environment.<sup>122</sup> The DEIS notes Micron is evaluating non-PFAS alternatives, but nevertheless affirms PFAS use at the proposed facility remains “essential” and that there are no known substitutes for “many PFAS uses” at its proposed facility.<sup>123</sup>

At base, the DEIS does not tell the public which PFAS compounds the facility will release or the anticipated concentrations of such PFAS in the facility’s wastewater. Neither a definitive list nor a reasonable attempt at an estimate based on similar Micron operations is provided.<sup>124</sup> This is not a tolerable level of detail given the seriousness of the risk PFAS pose and

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<sup>119</sup> DEIS at 3-239–41 (Micron would report the manufacture, process, or other use of individual TRI-listed PFAS that exceed reporting thresholds. This would include the 196 TRI-listed PFAS compounds.) Given only 196 of the more than 1,400 PFAS in commerce (using EPA’s narrow definition) are listed on the TRI, it is very possible that TRI reporting requirements will not cover any of the PFAS used at the Micron site, potentially rendering this commitment of little or no value. EPA, *Addition of Certain PFAS to the TRI by the National Defense Authorization Act*, <https://www.epa.gov/toxics-release-inventory-tri-program/addition-certain-pfas-tri-national-defense-authorization-act#> (last updated Jan. 17, 2025).

<sup>120</sup> Paige Jacob et al., *Target and Nontarget Analysis of Per- and Polyfluoralkyl Substances in Wastewater from Electronics Fabrication Facilities*, 55 *Env’t Sci. & Tech.* 2346 (2021), <https://pubs.acs.org/doi/10.1021/acs.est.0c06690>.

<sup>121</sup> DEIS at 3-239.

<sup>122</sup> Programmatic EA at C-15.

<sup>123</sup> DEIS at 3-239.

<sup>124</sup> For example, the DEIS could provide an estimate of PFAS in wastewater drawn from Micron’s Boise semiconductor facility, comparable domestic semiconductor facilities, or recent research of semiconductor wastewater content from industry groups of which Micron is a part, such as the Semiconductor Industry Association. See Semiconductor Indus. Ass’n, *Semiconductor PFAS Consortium*, <https://www.semiconductors.org/pfas/#:~:text=AND%20SEMICONDUCTOR%20PROCESSING%20%3E-,Technical%20Papers,-These%20publications%20were> (last accessed July 31, 2025).

the complete certainty that PFAS will be used at the proposed facility.<sup>125</sup> Even the Programmatic Environmental Assessment for CHIPS facilities was able to identify at least some of the specific PFAS used during semiconductor manufacturing.<sup>126</sup> It is feasible for Micron to provide more detail than is currently contained in the DEIS. Without knowing which PFAS are in use, it becomes far more difficult for regulators and the public to identify which test methods to use to monitor the Project's PFAS or to accurately evaluate the effectiveness of potential mitigation measures. Disclosure of the compounds themselves as well as estimation of their concentrations and release locations form the basis of informed monitoring, pollution control, and determination of health risks and practicable mitigation needs. Further information is needed on this subject to meet the mandates of SEQRA.

## 2. PFAS in Wastewater Permits

The DEIS relies on assurances of legal compliance with future permits and plans for an IWWTP to conclude the Project's PFAS impacts will be minimal. However, the DEIS describes the wastewater permits Micron intends to obtain and the pollution control technologies it will use in very general terms.<sup>127</sup> No commitments to any treatment technology are made. It is noncommittally suggested that reverse osmosis, nanofiltration, granular activated carbon, or potentially ion exchange resins may be candidates for PFAS removal at the proposed IWWTP, but the relative effectiveness and limitations of these technologies are not discussed.<sup>128</sup> Ultimately, the DEIS concludes that Micron is still assessing "emerging technologies" at the time of the DEIS and will select "appropriate solutions" at an unspecified later date.<sup>129</sup> This cursory and generalized disclosure regarding controls for PFAS in wastewater, a known and serious environmental risk, is so lacking in detail as to be unlawful under SEQRA.<sup>130</sup>

Additionally, the DEIS does not explain how anticipated permits will address, or if Micron commits to address, the PFAS in semiconductor wastewater that are not currently regulated and controlled under New York and federal Law. The DEIS does not provide any pending or anticipated permit applications or control plans as sources of information or otherwise include details about anticipated plan and permit terms. The DEIS instead relies heavily on general assertions that future plans and permits will be environmentally sufficient and that the Project will comply "with limits set forth" in those permits.<sup>131</sup> Generalized assurances a company will comply with the law, or vague gestures to future controls, do not satisfy the hard look standard, particularly given the severity of the Project's potential PFAS impacts.<sup>132</sup> This is

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<sup>125</sup> DEIS at 3-239; *see supra* II.A–C.

<sup>126</sup> Programmatic EA at C-14–25.

<sup>127</sup> DEIS at 3-240–41.

<sup>128</sup> DEIS 3-83.

<sup>129</sup> DEIS at 3-240–41.

<sup>130</sup> N.Y. Comp. Codes R. & Regs. tit. 6, § 617.9 (2018); *Town of Henrietta*, 76 A.D.2d at 224; *Brander*, 847 N.Y.S.2d at 457; *Boise*, 219 A.D.3d at 1058; *Penfield Panorama Area Cmty.*, 253 A.D.2d 342, 349–50; *Clean Air Action Network of Glens Falls, Inc.*, 235 A.D.3d at 1124; *H.O.M.E.S.*, 69 A.D.2d at 232.

<sup>131</sup> DEIS at 3-129; 3-240–41.

<sup>132</sup> *Id.*

especially so because the DEIS suggests that the permit for the wastewater treatment plant would include limits only for two specific PFAS.<sup>133</sup> While we do not believe that such a permit would be lawful, if Micron believes that its wastewater discharge permit would not have limits for each PFAS it expects to release, it is all the more critical that the DEIS include specific information about how Micron will prevent significant adverse environmental and public health impacts from the discharge of its wastewater.

Further, the current set of terms between Micron, NY State, and Onondaga County places financial responsibility for wastewater treatment at the IWWTP on Onondaga County.<sup>134</sup> Given the absence of detail in the current DEIS as well as the absence of financial assurances for the potential cost of the IWWTP, there are reasonable grounds for concern that the county may ultimately determine it cannot incorporate rigorous PFAS controls into the IWWTP due to cost constraints.

### 3. PFAS in Wastewater Discharges to Surface Water

The DEIS also does not discuss the environmental impacts of PFAS-contaminated discharges to local surface water. The DEIS concludes that any impact of its Industrial Wastewater Treatment Plant's effluent releases to the Oneida River will be limited to the plant outfall's mixing zone, a zone to be determined in future permit proceedings but to be "no greater than approximately 1,000 ft downstream."<sup>135</sup> It is not clear if—and is in fact extremely unlikely that—a mixing zone will ameliorate PFAS contamination from the IWWTP. A mixing zone is "an allocated impact zone where water quality criteria can be exceeded as long as acutely toxic conditions are prevented."<sup>136</sup> There are no water quality criteria or permissible acute toxicity values for the majority of the PFAS that Micron would be discharging into the Oneida River. Given there aren't water quality standards for the suite of PFAS at issue, it is far more likely that the mixing zone would address conventional pollutants and ignore PFAS, and it is unclear how NYSDEC or OCIDA will assure a mixing zone addresses the IWWTP's PFAS releases. In sum, the absence of discussion regarding PFAS-contaminated effluent's potential impacts on the Oneida River is unacceptable under SEQRA.

Further, as previously raised, the DEIS does not disclose which PFAS it anticipates releasing, which PFAS it anticipates monitoring for in its influent and effluent, or what PFAS removing technologies it commits to using.<sup>137</sup> Despite claiming no significant impacts beyond the mixing zone, the DEIS notes, correctly, that "effects of the IWWTP may vary depending on

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<sup>133</sup> DEIS at 3-240.

<sup>134</sup> See Empire State Dev., *Key Terms and Conditions for Development of the Micron Green Manufacturing Memory Chip Fab Campus in Clay, New York*, <https://esd.ny.gov/sites/default/files/Micron-Term-Sheet-Fully-Executed.pdf>; see also DEIS at 3-276–77.

<sup>135</sup> DEIS at 3-83.

<sup>136</sup> EPA, *Compilation of EPA Mixing Zone Documents* at 1 (July 2006), <https://www.epa.gov/sites/default/files/2018-10/documents/compilation-epa-mixingzone-documents.pdf>.

<sup>137</sup> *Supra* III.A.1–2.

final design of the treatment plant,” which will be decided as “appropriate,” later.<sup>138</sup> Unsurprisingly, as a result, unacceptable information gaps remain as to whether the DEIS’s conclusions about the negligible impact of effluent beyond the mixing zone are factually sound.

The ubiquity of PFAS contamination in U.S. surface waters is due, in part, to PFAS’ mobility and persistence. Persistent and mobile chemicals, such as PFAS, can easily migrate beyond the mixing zones of wastewater treatment plant outfalls.<sup>139</sup> PFAS pass through wastewater treatment plants, such that PFAS contamination of a given body of water increases in tandem with the increased presence of wastewater treatment plant outfalls into that body of water and those it is hydrologically connected to.<sup>140</sup> Acknowledgement of the aforementioned risks and a “hard look” discussion of the IWWTP’s potential impacts is not included in the DEIS.

### **B. The DEIS Fails to Take a Hard Look at the Impacts of PFAS Air Emissions**

The DEIS acknowledges that Micron will use and release fluorinated gases (“F-gases”), with almost 2.5 tons of projected “fluoride” emissions from fabs 1 and 2 alone.<sup>141</sup> EPA calculates the greenhouse gas emissions associated with those releases, “which have the ability to trap thousands of times as much heat as CO<sup>2</sup> on a pound-for-pound basis.”<sup>142</sup> But the DEIS overlooks the fact that many F-gases are themselves PFAS or PFAS precursors, the impacts of which extend far beyond their contribution to climate change.

F-gases comprise more than 60 percent of the world’s annual PFAS emissions.<sup>143</sup> In the environment, most F-gases degrade into trifluoroacetic acid (“TFA”), one of the most prevalent PFAS.<sup>144</sup> In addition to its high persistence, TFA is associated with developmental toxicity<sup>145</sup>

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<sup>138</sup> DEIS at 3-129, 3-241.

<sup>139</sup> Sigler et al., 2024 at 1.

<sup>140</sup> *Id.* at 1–2; Biting Qiao et al., *Nontarget Screening and Occurrence of Emerging Per- and Polyfluoroalkyl Substances in Municipal and Semiconductor Industrial Wastewater: A Large-Scale Survey in China*, 59 *Env’t Sci. & Tech.* 11829,A (2023), <https://doi.org/10.1021/acs.est.5c02035>; See Wash. State Dep’t of Ecology (“Wash. DOE”), *PFAS in Wastewater*, <https://ecology.wa.gov/waste-toxics/reducing-toxic-chemicals/addressing-priority-toxic-chemicals/pfas/wastewater> (last accessed July 29, 2025) (explaining that [n]early all municipal wastewater treatment plants have measurable levels of PFAS in their discharge” because “available treatment technologies do not destroy PFAS”); Amila O. De Silva et al., *PFAS Exposure Pathways for Humans and Wildlife: A Synthesis of Current Knowledge and Key Gaps in Understanding*, 40 *Env’t Toxicology & Chemistry* 631, 634 (2020).

<sup>141</sup> DEIS at 3-165, 3-183.

<sup>142</sup> *Id.* at 3-183.

<sup>143</sup> ChemSec, *F-Gases Unveiled as Primary Contributors to the PFAS Pollution Crisis* (May 16, 2024), <https://chemsec.org/f-gases-unveiled-as-primary-contributors-to-the-pfas-pollution-crisis/>.

<sup>144</sup> *Id.*

<sup>145</sup> U.K. Health & Safety Exec., *Analysis of the Most Appropriate Regulatory Management Options (RMOA)* at 107 (Mar. 2023), <https://www.hse.gov.uk/reach/assets/docs/pfas-rmoa.pdf>.

and liver and thyroid harm.<sup>146</sup> TFA is ubiquitous in the environment and extremely difficult to control, since “methods to remove TFA from water are expensive and often inefficient due to TFA’s persistence and mobility.”<sup>147</sup> Here, not only does the DEIS fail to mention TFA, but it “never considered the potential impacts of the project’s [F-gas] emissions at all.”<sup>148</sup>

The DEIS states that “thermal oxidation” will be used to control F-gas emissions.<sup>149</sup> But OCIDA fails to discuss the limitations of thermal treatment options for PFAS, which resist thermal degradation. Last year, EPA concluded that “the data are insufficient to allow conclusions on the overall efficiency of thermal oxidizers in PFAS destruction.”<sup>150</sup> Moreover, despite industry’s claims of high PFAS destruction rates, recent air sampling around a Chemours thermal oxidizer in North Carolina detected high levels of PFAS.<sup>151</sup> “Because there is no evidence in the record before us that [OCIDA] even considered the impact” of the Project’s PFAS air emissions, the DEIS violates SEQRA’s requirement to take a “hard look” at those impacts.<sup>152</sup>

### C. The DEIS Fails to Take a Hard Look at the Impacts of PFAS Waste Disposal

The DEIS also fails to discuss the generation of PFAS-contaminated solid waste or to evaluate the impacts of handling and disposing of such waste. OCIDA asserts that the Project’s IWWTP “would include technologies specifically designed to remove . . . PFAS,” such as “reverse osmosis and nanofiltration (membranes used to filter out PFAS . . . )” or “granular activated carbon (an effective method for removing PFAS through adsorption).”<sup>153</sup> Those treatment methods, however, generate PFAS-contaminated filters or membranes that must ultimately be disposed of, and the DEIS does not consider the impacts of that PFAS disposal.

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<sup>146</sup> ATMOSphere, *The Rising Threat of HFOs and TFA to Health and the Environment* at 11 (Oct. 4, 2022), [https://issuu.com/shecco/docs/2022\\_atmo\\_hfo\\_tfa\\_report](https://issuu.com/shecco/docs/2022_atmo_hfo_tfa_report).

<sup>147</sup> Hans Peter H. Arpet et al., *The Global Threat from the Irreversible Accumulation of Trifluoroacetic Acid (TFA)*, 12 *Env’t Sci. & Tech.* 19925, 19927 (2024), <https://pmc.ncbi.nlm.nih.gov/articles/PMC11562725/>.

<sup>148</sup> *Clean Air Action Network of Glens Falls, Inc.*, 235 A.D.3d at 1128.

<sup>149</sup> DEIS at 3-189.

<sup>150</sup> EPA, *Interim Guidance on the Destruction and Disposal of Perfluoroalkyl and Polyfluoroalkyl Substances and Materials Containing Perfluoroalkyl and Polyfluoroalkyl Substances* at 52 (Apr. 8, 2024), <https://www.epa.gov/system/files/documents/2024-04/2024-interim-guidance-on-pfas-destruction-and-disposal.pdf>.

<sup>151</sup> Tom Perkins, *A North Carolina PFAS Factory Claims its Emissions Fell by 99.9%. A Guardian Test Reveals Otherwise*, *The Guardian* (Jan. 8, 2024), <https://www.theguardian.com/us-news/2024/jan/28/north-carolina-pfas-forever-chemicals-testing>.

<sup>152</sup> *Wellsville Citizens ex rel. Responsible Dev., Inc. v. Wal-Mart Stores, Inc.*, 140 A.D.3d 1767, 1770 (3d Dep’t 2016); see also *Clean Air Action Network of Glens Falls, Inc.*, 235 A.D.3d at 1128 (“[T]he planning board failed to take a hard look at the project’s potential adverse impacts on air . . . [where] the record confirms that the planning board never considered the potential impacts of the project’s HAP emissions at all.”).

<sup>153</sup> DEIS at 3-83.

The DEIS states “non-hazardous solid waste generated at the IWWTP would either be disposed of at the [Onondaga County Waste-to-Energy] Facility for energy recovery or, depending on the waste type, collected via private hauler for transport to landfills.”<sup>154</sup> Both of those options have the potential to further spread PFAS contamination, as opposed to destroying it. In addition to the broader concerns about PFAS incineration discussed above,<sup>155</sup> waste-to-energy plants routinely operate below combustion temperatures that are associated with PFAS destruction. The Onondaga County Waste-to-Energy Facility is required to maintain a combustion temperature of 1,800 degrees Fahrenheit,<sup>156</sup> or roughly 980 degrees Celsius. However, a recent study by EPA scientists found incomplete PFAS destruction and the formation of new PFAS byproducts at incineration temperatures below 1,000 degrees Celsius.<sup>157</sup>

As described above, the disposal of concentrated PFAS waste in landfills is equally problematic. EPA evaluated discharge data from over 200 landfills nationwide and detected PFAS in the leachate at more than 95 percent of them.<sup>158</sup> The DEIS does not indicate how such leachate would be managed, and EPA has warned that “improper management of landfill leachate would result in PFAS releases.”<sup>159</sup> Many PFAS can also volatilize in landfills and reenter the environment as landfill gas.<sup>160</sup> However, less than half of the municipal solid waste landfills in the United States have gas collection systems in place,<sup>161</sup> and even when landfill gas is captured, it is often flared at temperatures that are too low to destroy gaseous PFAS.<sup>162</sup>

Here, too, the record contains “no evidence . . . that [OCIDA] even considered” the risks associated with the disposal of the Project’s PFAS-containing solid waste, in violation of SEQRA’s “hard look” standard.<sup>163</sup>

#### **D. The DEIS Fails to Take a Hard Look at Occupational Exposures to PFAS**

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<sup>154</sup> *Id.* at 3-233.

<sup>155</sup> *See I.C supra.*

<sup>156</sup> N.Y. Div. of Air Res., *Onondaga County Resource Recovery Facility Air Title V Permit at 126*, [https://extapps.dec.ny.gov/data/dar/afs/permits/731420002800009\\_r2.pdf](https://extapps.dec.ny.gov/data/dar/afs/permits/731420002800009_r2.pdf).

<sup>157</sup> Erin P. Shields et al., *Pilot-Scale Thermal Destruction of Per- and Polyfluoroalkyl Substances in a Legacy Aqueous Film Forming Foam*, 3 *Env’t Sci. & Tech Eng’g Art. No. 1308*, 6, 10 (2023), <https://pmc.ncbi.nlm.nih.gov/articles/PMC11235189/>.

<sup>158</sup> EPA, *Effluent Guidelines Program Plan 15* at 6-13 (Jan. 2023), [http://epa.gov/system/files/documents/2023-01/11143\\_ELG%20Plan%2015\\_508.pdf](http://epa.gov/system/files/documents/2023-01/11143_ELG%20Plan%2015_508.pdf).

<sup>159</sup> EPA, *Interim Guidance on the Destruction and Disposal of Perfluoroalkyl and Polyfluoroalkyl Substances and Materials Containing Perfluoroalkyl and Polyfluoroalkyl Substances* at 84.

<sup>160</sup> Ashley M. Lin et al., *Landfill Gas: A Major Pathway for Neutral Per- and Polyfluoroalkyl Substance (PFAS) Release*, 11 *Env’t Sci. Tech. Letts. Art. No. 730, D* (June 26, 2024), <https://doi.org/10.1021/acs.estlett.4c00364>.

<sup>161</sup> Tolaymat et al. 2023 at 14.

<sup>162</sup> *Id.* at 16 (“Flares generally operate at ~650 °C to 850 °C . . . [H]owever, laboratory-scale thermal PFAS destruction experiments indicate that temperatures higher than 1000 °C are necessary to achieve the mineralization of PFAS.”).

<sup>163</sup> *Wellsville Citizens*, 140 A.D.3d at 1770.

Micron’s use of PFAS also threatens the health of workers who handle or are otherwise exposed to those chemicals. The DEIS, however, contains no information about anticipated occupational exposure levels or the effects of those exposures.

The DEIS states that exposure to toxic chemicals “would not result in significant adverse effects on [worker] health and safety” because “Micron would apply the most protective occupational exposure limit, based on published industry standards, for each individual chemical or hazardous substance that would be used in the facility manufacturing process.”<sup>164</sup> But the DEIS does not identify a single applicable Occupation Exposure Limit for total PFAS or for the specific PFAS that Micron plans to use. There are no Occupational Safety & Health Administration permissible exposure limits or National Institute for Occupational Safety and Health (“NIOSH”) recommended exposure limits for PFAS, and the American Conference for Governmental Industrial Hygienists has established Threshold Limit Values (“TLVs”) for only three PFAS.<sup>165</sup> It is therefore unclear what limit, if any, Micron intends to apply to protect its workers from PFAS exposures.

#### **E. The DEIS Fails to Take a Hard Look at PFAS Drinking Water Impacts**

Regarding groundwater, the DEIS acknowledges: (1) the existence of private, domestic wells used for drinking water or agriculture within a mile of the project area and (2) that its IWWTP and wastewater conveyance will overlay two unconsolidated aquifers that feed private, domestic water wells.<sup>166</sup> The DEIS correctly observes that unconsolidated aquifers are particularly “susceptible to contamination from the land surface above the aquifer.”<sup>167</sup> In several locations the DEIS describes an existing groundwater monitoring well system of approximately 42 wells.<sup>168</sup> It notes in high level terms that the monitoring wells will be used to “inform adaptive management” measures and “avoid and minimize” impacts on groundwater.<sup>169</sup>

While monitoring is a commendable step, the DEIS does not say whether this groundwater system monitors for PFAS, and if so, which PFAS and which wells. Relatedly, the DEIS does not provide details regarding whether or to what extent PFAS releases from the facility’s general operations or its wastewater conveyance and IWWTP threaten private residents’ drinking water supplies.

Regarding surface water, the DEIS notes that “all public water supply sources for the municipalities in which the proposed project and connected actions would be constructed . . .

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<sup>164</sup> DEIS at 3-258, 3-260.

<sup>165</sup> Ctrs. for Disease Control and Prevention (“CDC”), *PFAS and Worker Health* (Sept. 25, 2024), <https://www.cdc.gov/niosh/pfas/about/index.html>.

<sup>166</sup> DEIS at 3-70; DEIS App. F Vol. 1 at F-29, <https://ongoved.com/wp-content/uploads/2025/06/Micron-Draft-EIS-Appendix-F-Vol-1-Part-1.pdf>.

<sup>167</sup> DEIS App. F Vol. 1 Pt.1 at F-25.

<sup>168</sup> DEIS at 3-79.

<sup>169</sup> DEIS at 3-86.

originate from surface water” sourced from Lake Ontario or Otisco Lake.<sup>170</sup> Importantly “any treated effluent from the IWWTP that is not recycled and returned to the Micron Campus would be discharged into the Oneida River. The treated effluent would ultimately drain back into Lake Ontario.”<sup>171</sup> Additionally, the Connected Actions as a whole are “located within the broader Lake Ontario watershed.”<sup>172</sup>

Nevertheless, the DEIS claims all significant impacts of its wastewater discharges to surface waters are limited to the Oneida River mixing zone of no greater than 1,000 ft. The DEIS once again provides the general assurance that such releases are subject to “[State Pollutant Discharge Elimination System] permit terms and conditions.”<sup>173</sup> The overarching result is that the DEIS simply does not actually provide meaningful analysis of the risk that PFAS released from its IWWTP could impact public drinking water and whether mitigation under SEQRA is needed.<sup>174</sup> Drinking water is a primary pathway for human PFAS exposure.<sup>175</sup> A true hard look at this issue is necessary.

#### **F. The DEIS Fails to Consider the Project’s Cumulative PFAS Impacts**

“An agency making a SEQRA determination is required to consider the cumulative impact of its action” and other “related” actions.<sup>176</sup> Actions are “related,” and therefore trigger the requirement for a cumulative impact assessment, if they are: (1) “included in any long-range plan of which the action under consideration is a part,” (2) “likely to be undertaken as a result” of the action under consideration, or (3) “dependent” on the action under consideration.<sup>177</sup> Here, despite acknowledging that the Project would spur residential and commercial development in the surrounding area, the DEIS never evaluated the cumulative PFAS impacts from this Project and other development that is “likely to be undertaken” as a result of the Project.<sup>178</sup> This omission violates SEQRA.

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<sup>170</sup> DEIS App. F Vol. 1 Pt. 1 at F-26.

<sup>171</sup> DEIS at 3-278.

<sup>172</sup> DEIS at 3-105.

<sup>173</sup> DEIS at 3-278.

<sup>174</sup> DEIS at 3-83 to 3-84, 3-279.

<sup>175</sup> See Sze Yee Wee & Ahmad Zaharin Aris, *Environmental Impacts, Exposure Pathways, and Health Effects of PFOA and PFOS*, 267 *Ecotoxicology & Env’t Safety* Art. No. 115663, 6 (2023), <https://doi.org/10.1016/j.ecoenv.2023.115663>; Sze Yee Wee & Ahmad Zaharin Aris, *Revisiting the “Forever Chemicals”, PFOA and PFOS Exposure in Drinking Water*, 6 *npj Clean Water* Art. No. 57 (2023), <https://doi.org/10.1038/s41545-023-00274-6>.

<sup>176</sup> *Sprint Spectrum L.P. v. Willoth*, 176 F.3d 630, 647 (2d Cir. 1999); 6 N.Y.C.R.R. 617.9(b)(5)(iii)(a) (requiring an EIS to identify and discuss “reasonably related short-term and long-term impacts, [and] cumulative impacts.”).

<sup>177</sup> 6 N.Y.C.R.R. § 617.7(c)(2); *Long Island Pine Barrens Soc., Inc. v. Plan. Bd. of Town of Brookhaven*, 80 N.Y.2d 500, 512 (1992).

<sup>178</sup> DEIS at 4-1 to 4-11; 6 N.Y.C.R.R. § 617.7(c)(2).

According to the DEIS, there are nearly 50 “ongoing and reasonably foreseeable actions that potentially have cumulative effects in the immediate vicinity of the [ ] Project.”<sup>179</sup> These related actions include more than 4,000 new apartment units and homes; more than a million square feet of new commercial, retail, and office space development; and the “development of an industrial park on a 105-acre site owned by OCIDA to accommodate companies involved in innovating the semiconductor production supply chain.”<sup>180</sup> That induced and related development is likely to result in additional PFAS releases, exacerbating the Project’s environmental impacts. Residential development will result in increases in domestic wastewater and sewage, which contain PFAS.<sup>181</sup> The industrial park is likely to use and release PFAS as well, since many parts of the semiconductor supply chain—from hex nuts and washers to ion exchange membranes and refrigerants—contain PFAS.<sup>182</sup> The wastewater from that related development will presumably be discharged to the Oak Orchard Wastewater Treatment Plant, which discharges its effluent to the same receiving waters as the Project’s Industrial Wastewater Treatment Plant. SEQRA therefore requires OCIDA to evaluate the cumulative effects of those PFAS releases.

In its cumulative impact assessment, however, the DEIS never mentions PFAS. The DEIS acknowledges that “the reasonably foreseeable projects and potential induced growth could result in noticeable cumulative effects on hazardous waste and hazardous materials,” but claims those effects “would not be considered a significant adverse impact because hazardous waste and materials handling and storage, and hazardous waste disposal would comply with all applicable laws and regulations.”<sup>183</sup> As explained above, however, the assertion that the Project will comply with other laws—many of which do not directly address the PFAS that Micron is likely to use—does not excuse OCIDA’s failure to take a hard look at the Project’s cumulative PFAS impacts.<sup>184</sup> The DEIS also states that “none of the ongoing or future projects with effects that are cumulative with the Preferred Action Alternative would meaningfully alter or amplify the effects of the [Project]” because the Project is “the most significant driver[] of the environmental effects identified in this EIS.”<sup>185</sup> That argument is a red herring; nothing in SEQRA permits an agency to ignore cumulative effects merely because the impacts from related projects are less than the project undergoing review. Instead, the statute requires agencies to look at the combined effects of the Project and other related developments, and here OCIDA failed to do so.

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<sup>179</sup> DEIS at 4-1 to 4-11

<sup>180</sup> *Id.* at 4-6 to 4-11.

<sup>181</sup> Diana Lin et al., *Residential Wastewater as a Major Source of Per- and Polyfluoroalkyl Substances to Municipal Wastewater*, 4 ACS ES&T Water 4847 (2024) <https://pubs.acs.org/doi/10.1021/acsestwater.4c00507>.

<sup>182</sup> Semiconductor Indus. Ass’n, *PFAS-Containing Articles Used in Semiconductor Manufacturing* at 7 (July 31, 2023), <https://www.semiconductors.org/pfas-containing-articles-used-in-semiconductor-manufacturing/>.

<sup>183</sup> DEIS at 4-25.

<sup>184</sup> *See supra* II.C.

<sup>185</sup> DEIS at 0-15.

### **G. The DEIS Fails to Take a Hard Look at PFAS Impacts on Local Species and Ecosystems**

The DEIS and its internal draft Biological Assessment discuss potential negative impacts to species afforded an “additional level of protection by law, regulation, or policy,” including those listed or proposed to be listed as threatened or endangered under State or Federal Endangered Species Acts or “otherwise granted special status.”<sup>186</sup> These special status species and their potential habitat areas are enumerated and the measures intended to mitigate unavoidable impacts to local species and ecosystems are listed.<sup>187</sup> The DEIS ultimately concludes there will be significant adverse ecological impacts resulting from construction but no significant impacts associated with operation of the proposed project.<sup>188</sup> At no point in this analysis, however, does the DEIS discuss the potential impacts of the Project’s PFAS releases on protected species.

In a number of locations, the DEIS defers analysis of impacts potentially relevant to ecological issues to future permitting and planning processes. For example, the DEIS concludes suitable habitat for Lake Sturgeon and Bald Eagle, two special status species, exist in the vicinity of the IWWTP operations and the plant outfall itself.<sup>189</sup> Instead of evaluating the potential impacts on those species, however, the DEIS simply asserts that future permits will examine and resolve any environmental impact.<sup>190</sup> Regarding impacts to Lake Sturgeon, the DEIS states in general terms that “OCDWEP would be responsible for operating the IWWTP in compliance with SDPES industrial wastewater permit conditions, including conditions to protect water quality.”<sup>191</sup> Similar conclusions are made for Bald Eagle.<sup>192</sup>

There is no detailed discussion of potential PFAS release impacts on local species. Gaps remain across the DEIS’s discussion of whether PFAS released to surface waters or ambient air will impact local ecosystems in any way. The DEIS forgoes discussion of how the IWWTP’s releases into Lake Oneida and hydrologically connected waters may impact local aquatic ecosystems and species, likely because the DEIS assumed the proposed facility’s effluent will have no impact beyond a 1,000-foot mixing zone.<sup>193</sup> The DEIS similarly does not provide details as to the impact of PFAS releases into air on locally documented species of concern.

### **H. The DEIS Improperly Defers Analysis of Salient Environmental Issues to Subsequent Permitting Processes**

As demonstrated in the previous discussion of information gaps, the DEIS improperly defers critical information about the proposed facility’s environmental impacts to subsequent administrative processes outside of SEQRA. This systemic lack of detail on aspects of the

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<sup>186</sup> DEIS at 3-105.

<sup>187</sup> DEIS at 3-95–136.

<sup>188</sup> DEIS at 0-7.

<sup>189</sup> DEIS at 3-110; *See also* DEIS App. G Vol. 1 at G-69, G-71, [https://ongoved.com/wp-content/uploads/2025/06/Micron-Draft-EIS-Appendix\\_G\\_Vol\\_1.pdf](https://ongoved.com/wp-content/uploads/2025/06/Micron-Draft-EIS-Appendix_G_Vol_1.pdf).

<sup>190</sup> DEIS at 3-126 to 3-127, 3-130–31.

<sup>191</sup> DEIS 3-131.

<sup>192</sup> DEIS 3-131

<sup>193</sup> DEIS at 3-83–84.

proposed facility that may be managed in future permits or plans makes it impossible to reasonably understand the scope of the project’s PFAS impacts or to evaluate alternatives and mitigation measures. In so doing, the DEIS shields aspects of the proposed facility’s environmental impacts from disclosure and public scrutiny.

This deferral of environmental analysis is improper because (1) the DEIS’s current analysis of future permit terms and associated plans is too vague and (2) OCIDA’s assumption that future permits will mitigate significant PFAS impacts is “without sound basis in reason or regard to the facts,” and thus arbitrary and capricious.<sup>194</sup>

## **I. Micron Cannot Assume That Future Environmental Permits Will Adequately Address Micron’s PFAS Impacts**

### **1. SPDES Permits**

First, the discussion of SPDES permits in the DEIS is impermissibly vague. Neither the permit applications nor the plans on which Micron intends to rely have been finalized or their draft terms otherwise provided in the DEIS. The absence of such information prevents the public from understanding the impacts of the Project’s PFAS releases or determining whether additional mitigation is needed under SEQRA.

Second, using a promise of compliance with unspecified SPDES permit terms to defer detailed discussion of PFAS impacts is unlawful. To date, SPDES permit requirements have not prevented the widespread release of PFAS from wastewater treatment plants and other industrial facilities.<sup>195</sup> And unlike conventional pollutants, existing regulations focus on a significantly smaller subset of PFAS than what is typically present in semiconductor wastewater. New York has not established water quality standards for any PFAS, and NYSDEC has only set SPDES Guidance Values (which require monitoring, not mitigation) for two PFAS (PFOA and PFOS).<sup>196</sup> Similarly, New York State drinking water standards address only PFOA and PFOS,<sup>197</sup> and federal drinking water standards address six PFAS, with all but PFOA and PFOS currently

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<sup>194</sup> *Clean Air Action Network of Glens Falls*, 235 A.D.3d at 1126 (“An action is arbitrary and capricious when it is taken without sound basis in reason or regard to the fact.”).

<sup>195</sup> Letter to Administrator Lee Zeldin, from Alaska Cmty. Action on Toxics, Re: Maintaining and Defending EPA’s Hazardous Substance Designations and Drinking Water Standards for Per- and Polyfluoroalkyl Substances at 2 (Apr. 23, 2025), <https://www.ogeecheeriverkeeper.org/wp-content/uploads/2025/04/2025.04.23-Letter-Supporting-EPA-PFAS-Regulations.pdf>.

<sup>196</sup> Div. of Water, *2023 Addendum to June 1998 Division of Water Technical and Operational Guidance Series (TOGS) No. 1.1.1* (Feb. 2023), [https://extapps.dec.ny.gov/docs/water\\_pdf/togs111addendum2023.pdf](https://extapps.dec.ny.gov/docs/water_pdf/togs111addendum2023.pdf); see NYDEC, *Emerging Contaminants in NY’s Waters*, <https://dec.ny.gov/environmental-protection/water/emerging-contaminants> (last accessed July 30, 2025).

<sup>197</sup> N.Y. State Dep’t of Health, *Public Water Systems and Drinking Water Standards for PFAS and Other Emerging Contaminants* (Apr. 2024), [https://www.health.ny.gov/environmental/water/drinking/emerging\\_pfas\\_publicwater.htm](https://www.health.ny.gov/environmental/water/drinking/emerging_pfas_publicwater.htm).

under reconsideration for rollback.<sup>198</sup> In other words, the majority of public treatment works and drinking water systems in New York are not regularly monitoring for PFAS apart from PFOA and PFOS. The subset of PFAS subject to new or recently renewed permits in priority areas contain action levels only for PFOA and PFOS, two PFAS that have been largely or wholly phased out of microchip production.<sup>199</sup>

While the Clean Water Act can and should be utilized to control a broader suite of PFAS,<sup>200</sup> in the current regulatory landscape, taking a hard look at anticipated environmental impacts from PFAS requires more than a general promise the facility will comply with the law. In fact, in New York, the bar for OCIDA is much higher given the enshrinement of the state's constitutional environmental right, requiring OCIDA to consider the environmental impacts resulting from inadequate state regulatory frameworks.<sup>201</sup>

Micron's general references to future SPDES permits<sup>202</sup> are also not a salve for the local community's concern about PFAS exposure or a proper basis for the exclusion of detailed discussion of PFAS potential wastewater impacts from the DEIS. In the current regulatory landscape, taking a hard look at anticipated environmental impacts from PFAS requires more than a general promise the facility will comply with the law.

## 2. Clean Air Act Permits

The DEIS notes that Micron “must apply for and receive an air permit from the NYSDEC prior to construction, modification, or operation.”<sup>203</sup> This permit would regulate criteria air pollutants, such as nitrogen oxides and particulate matter, pursuant to the Clean Air Act's New Source Review and Prevention of Significant Deterioration requirements.<sup>204</sup> The facility would also be subject to the Semiconductor Manufacturing National Emission Standards for Hazardous

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<sup>198</sup> 89 Fed. Reg. at 32,532; EPA, *Final PFAS National Primary Drinking Water Regulation*, <https://www.epa.gov/sdwa/and-polyfluoroalkyl-substances-pfas> (last updated May 21, 2025).

<sup>199</sup> See Semiconductor Indus. Ass'n, *PFOS and PFOA Conversion to Short-Chain PFAS-Containing Materials Used in Semiconductor Manufacturing* (June 5, 2023), <https://www.semiconductors.org/pfos-and-pfoa-conversion-to-short-chain-pfas-containing-materials-used-in-semiconductor-manufacturing/>.

<sup>200</sup> The Clean Water Act contains prohibitions on pass-through and other related provisions that control PFAS compounds beyond the limited subset explicitly targeted under current regulations. See, e.g., 40 C.F.R. § 403.5(a)(1) (“A User may not introduce into a [publicly owned treatment works] any pollutant(s) which cause Pass Through or Interference.”).

<sup>201</sup> See N.Y. Const. art. I, § 19. A major impetus for the Green Amendment was the PFAS water contamination crisis in Hoosick Falls, NY, where the village was poisoned by PFAS chemicals that were not regulated at the time.

<sup>202</sup> See, e.g., DEIS at 3-241 (“Micron's final design will include wastewater treatment for regulated PFAS-containing wastewater that meets current regulatory requirements under New York and Federal law prior to discharge to the IWWTP.”).

<sup>203</sup> DEIS at 3-151.

<sup>204</sup> *Id.* at 3-147, 3-148, 3-151.

Air Pollutants (“NESHAP”), which regulates hazardous air pollutants like xylene and hydrogen fluoride.<sup>205</sup>

But PFAS, however, are not regulated as criteria pollutants, and no PFAS are currently designated as hazardous air pollutants under the Clean Air Act. Rather, “despite the serious health and environmental threats posed by airborne emissions of PFAS, EPA has taken little to no action [to control such emissions] under the Clean Air Act.”<sup>206</sup> Air permits for existing Micron facilities do not address PFAS air emissions,<sup>207</sup> and the DEIS contains “no ‘reasoned elaboration’ as to why . . . the issuance of a state facility permit . . . would result in no significant adverse environmental impact from the project’s air emissions.”<sup>208</sup> Therefore, to prevent significant adverse impacts, OCIDA and NYSDEC (as an involved agency under SEQRA) must impose specific mitigation measures to address PFAS air emissions in their respective SEQRA findings statements.

#### **IV. The DEIS Fails to Mitigate the Harms from Micron’s PFAS Releases to the Maximum Extent Practicable**

##### **A. Micron Fails to Commit to Any Concrete PFAS Mitigation Measures**

“The purpose of SEQRA is to mitigate as much as is feasible the impact on the environment caused by development projects or other actions approved by state or local agencies.”<sup>209</sup> Therefore, “a discussion of feasible mitigation measures that could address specific identified impacts is a fundamental component of every EIS.”<sup>210</sup> In addition to requiring the identification and analysis of mitigation measures, SEQRA requires agencies to adopt measures that “minimize or avoid adverse environmental effects” to the “maximum extent practicable.”<sup>211</sup>

Here, the DEIS does not identify—much less commit to—practicable PFAS mitigation measures. With respect to solid waste, hazardous waste, and hazardous materials, the DEIS states

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<sup>205</sup> *Id.* at 3-149.

<sup>206</sup> Robert L. Glicksman & Johanna Adashek, *Agency Authority to Address Chemicals of Emerging Concern: EPA’s Strategic Use of Emergency Powers to Address PFAS Air Pollution*, 48 *Harv. L. Rev.* 369, 369 (2024), [https://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=4574426](https://papers.ssrn.com/sol3/papers.cfm?abstract_id=4574426).

<sup>207</sup> *See, e.g.*, Idaho Dept. of Env’t Quality, *Micron Tier II Operating Permit* (June 20, 2025) <https://www2.deq.idaho.gov/admin/LEIA/api/document/download/9609>.

<sup>208</sup> *Clean Air Action Network of Glens Falls, Inc.*, 235 A.D.3d at 1128.

<sup>209</sup> *Allied Princess Bay Co. No. 2 v. Atochem N. Am., Inc.*, 855 F. Supp. 595, 601 (E.D.N.Y. 1993).

<sup>210</sup> NYDEC SEQRA Handbook at 121; *see also* N.Y. ECL § 8-0109(2)(f) (McKinney 2024); 6 N.Y.C.R.R. § 617.11(d)(5).

<sup>211</sup> N.Y. ECL § 8-0109(1),(8); *see also* 6 N.Y.C.R.R. § 617.11(d)(5) (requiring a SEQRA findings statement to “certify that consistent with social, economic and other essential considerations from among the reasonable alternatives available . . . adverse environmental impacts will be avoided or minimized to the maximum extent practicable by incorporating as conditions to the decision those mitigative measures that were identified as practicable.”).

that “significant adverse effects are not anticipated, and no mitigation measures are required.”<sup>212</sup> However, as described above, there are major gaps in the DEIS analysis of PFAS-containing waste. With respect to PFAS air or water releases, the DEIS defers the mitigation analysis and commits only to compliance with future administrative processes and regulations. But participation in “regulatory permitting conditions and normal administrative procedures” is not a substitute for SEQRA mitigation.<sup>213</sup>

To comply with SEQRA’s mitigation requirements, OCIDA and other involved agencies must specify mitigation measures that address the significant adverse effects from the Project’s use and release of PFAS. Such mitigation must minimize PFAS use, require closed systems wherever feasible, and prohibit the environmental release of any PFAS, including through the disposal of PFAS-containing waste. Moreover, those commitments must be memorialized as binding conditions of project approval, either in the Project’s SEQRA Findings Statements or in subsequent permits. Below, we provide a non-exhaustive list of mitigation measures that are needed to “minimize or avoid” the significant adverse effects associated with PFAS, as required by SEQRA.

### **Monitoring**

1. To establish baseline environmental conditions, prior to the start of construction, Micron shall conduct monitoring for PFAS: (a) in groundwater upgradient, on-site, and downgradient from the Project site, (b) in surface water upstream and downstream from the outfall at the Oak Orchard Wastewater Treatment Plant, and (c) in aquatic species in the Oneida River. Such monitoring shall utilize EPA-approved methods that cover the greatest range of detectable PFAS, including all PFAS detectable using Methods 1633 or 1633A, as well as Adsorbable Organic Fluorine (EPA Method 1621) and Total Organic Fluorine. The results of such sampling shall be made publicly available online on a dedicated, easy-to-find webpage promptly after the lab results are complete.<sup>214</sup>

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<sup>212</sup> DEIS at 0-10.

<sup>213</sup> See NYDEC SEQR Handbook at 78; *Boise*, 219 A.D.3d at 1058.

<sup>214</sup> EPA’s Method 1633A, which measures the presence of forty PFAS analytes, and Method 1621, which quantifies the total load of organic fluorine as a surrogate for the load of PFAS compounds, currently represent the best available science for measuring a broad set of PFAS compounds in aqueous matrices. They should therefore be used by Micron and any governmental entity sampling aqueous matrices for PFAS in the vicinity of the Micron site. These methods have been subjected to rigorous review and multi-laboratory validation studies, with opportunities for public comment in their draft and final stages. The delay in federal codification of these methods is not a basis for declining to rely on them, as Micron suggests. DEIS at 3-240. Indeed, EPA recommends use of Method 1633 or 1633A “as the best analytical methods currently available for monitoring of effluent for PFAS.” EPA, *Using PFAS Methods in NPDES Permits in Frequent Questions about PFAS Methods for NPDES Permits*, <https://www.epa.gov/cwa-methods/frequent-questions-about-pfas-methods-npdes-permits> (last updated July 3, 2025).

2. To monitor the Project's impacts and identify potential PFAS releases, Micron shall repeat the monitoring required in paragraph (1) at least once every six months during the construction and operation of the Project, and shall post the results of such sampling on a dedicated, easy-to-find website promptly after the lab results are complete.
3. Micron shall offer to conduct annual PFAS monitoring at all private drinking water wells located within a 3-mile radius of the Project site, including an offer to conduct baseline monitoring of drinking wells before the Micron facility commences operation. Such monitoring shall utilize EPA-approved methods that cover the greatest range of detectable PFAS, including Methods 533 and 537.1, and the results of monitoring shall be made available to the property owner and occupants or tenants.
4. Micron shall monitor PFAS in its wastewater, before and after pretreatment. Such monitoring shall utilize EPA-approved methods that cover the greatest range of detectable PFAS, including all PFAS detectable using Methods 1633 or 1633A, as well as Adsorbable Organic Fluorine and Total Organic Fluorine. Such sampling shall be required as a condition of the Micron's facility's SPDES permit, and the results of such sampling shall be made publicly available online on a dedicated, easy-to-find webpage promptly after the lab results are complete.
5. Micron shall monitor PFAS in its air emissions, including but not limited to emissions from thermal oxidation systems. Such monitoring shall utilize EPA-approved methods that cover the greatest range of detectable PFAS, including all PFAS detectable using Methods OTM-45 and OTM-50, as well as Total Organic Fluorine. Such sampling shall be required as a condition of the Micron's Title V permit, and the results of such sampling shall be made publicly available online on a dedicated, easy-to-find webpage promptly after the lab results are complete.
6. Micron shall fund the quarterly monitoring of PFAS in the influent, effluent, and biosolids from IWWTP at the Oak Orchard Site. Such monitoring shall utilize EPA-approved methods that cover the greatest range of detectable PFAS, including all PFAS detectable using Methods 1633 or 1633A, as well as Adsorbable Organic Fluorine and Total Organic Fluorine. Such sampling shall be required as a condition of the IWWTP's SPDES permit, and the results of such sampling shall be made publicly available online on a dedicated, easy-to-find webpage promptly after the lab results are complete.
7. Recognizing that the methods for measuring PFAS in water, air, and solid matrices will evolve and improve, including by expanding the set of PFAS compounds that can be reliably identified, Micron shall commit to tracking the development of new test methods for all of the monitoring required above and shall use the most advanced monitoring methods recognized by EPA or an agency of any state.

### **Minimization of PFAS**

8. Prior to commencing operations, and at least once every five years thereafter, Micron shall conduct an evaluation of the specific PFAS that are known, intended, or reasonably foreseen to be used on site; the respective functions of such PFAS; and whether such PFAS can be reduced or eliminated (the “PFAS Alternatives Assessment”). The PFAS Alternatives Assessment shall include, but not be limited to: (1) the potential use of polyoxyethylene or alkyl polyglucoside surfactants as alternatives to PFAS in the etching process,<sup>215</sup> (2) the potential use of non-fluorinated photoacid generators as alternatives to PFAS in photolithography,<sup>216</sup> and (3) the potential use of PFAS-free membranes throughout the semiconductor production process.<sup>217</sup> The PFAS Alternatives Assessment shall be made public on a dedicated, easy-to-find webpage.
9. Micron shall use less hazardous, non-PFAS alternatives wherever practicable, and shall prepare an annual report on its actions taken to reduce or eliminate PFAS use. Such report shall include an explanation for Micron’s continued use of any PFAS with an identified alternative.
10. Micron shall establish a \$100,000,000.00 PFAS research fund, which shall be used to fund: (1) the development of safer alternatives to the PFAS used by Micron, (2) the development of test methods that can detect the PFAS used by Micron in relevant environmental media and matrices, to the extent such methods do not currently exist, and (3) the development of safer disposal methods for PFAS-containing waste.

### **Worker Protection**

11. Micron’s Hazard Communication Program, prepared pursuant to Occupational Safety & Health Administration (“OSHA”) regulations, shall include an inventory of all PFAS used at the facility and a Safety Data Sheet for each PFAS.<sup>218</sup>
12. Micron shall conduct personal breathing zone air sampling for all detectable PFAS used at the facility. The results of such sampling shall be made available to all facility workers.

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<sup>215</sup> See Rashmi Sharma et al., *Safer and Effective Alternatives to Perfluoroalkyl-Based Surfactants in Etching Solutions for the Semiconductor Industry*, 415 J. of Cleaner Production Art. No. 37879, 1, (2023), <https://doi.org/10.1016/j.jclepro.2023.137879>.

<sup>216</sup> See Danilo De Simone & Emily Gallagher, *Patterning Performance of Perfluoroalkyl Substances (PFAS) Free EUV Chemically Amplified Resists: A Step Towards Environmentally Friendly Lithographic Chemicals*, 13428 SPIE (2025), <https://doi.org/10.1117/12.3052050>; Emily Gallagher & Danilo De Simone, *Removing PFAS from Semiconductor Manufacturing, from Resists to Rinses*, EE Times (April 3, 2025), <https://www.eetimes.eu/removing-pfas-from-semiconductor-manufacturing-from-resists-to-rinses/>.

<sup>217</sup> See Fraunhofer-Gesellschaft, *PFAS-Free Polymer Membranes for Semiconductor Processing*, (June 3, 2024) <https://www.fraunhofer.de/en/press/research-news/2024/june-2024/pfas-free-polymer-membranes-for-semiconductor-processing.html>.

<sup>218</sup> DEIS at 3-259; 29 C.F.R. § 1910.1200.

13. Micron shall adopt an Exposure Control Plan to prevent or minimize workplace exposures to PFAS in a manner consistent with the occupational hierarchy of controls.<sup>219</sup>

#### **Pretreatment and Disposal Requirements**

14. The Onondaga County Department of Water Environment Protection (“OCDWEP”) shall implement a Pretreatment Program for discharges to the Project’s IWWTP, in accord with Clean Water Act regulations.<sup>220</sup>
15. The OCDWEP Pretreatment Program shall prohibit the discharge to surface or groundwater of any wastewater containing any detectable levels of any PFAS to the IWWTP. Clean Water Act regulations prohibit an industrial facility from sending wastewater to a wastewater treatment facility if the wastewater contains pollutants that will “pass through” the facility.<sup>221</sup> It is well-documented that PFAS pass through wastewater treatment facilities.<sup>222</sup> Micron shall prioritize the use of wastewater pretreatment methods that destroy, rather than remove, PFAS. Such methods may include, but are not limited to supercritical water oxidation.<sup>223</sup>
16. OCIDA and OCDWEP shall impose a condition that the Micron plant cannot commence operations until (1) the IWWTP is fully operational, and (2) the IWWTP has demonstrated its ability to treat PFAS-containing waste without any “pass through.”<sup>224</sup>

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<sup>219</sup> CDC, *Hierarchy of Controls* (Apr. 10, 2024), <https://www.cdc.gov/niosh/hierarchy-of-controls/about/index.html>.

<sup>220</sup> The Clean Water Act EPA requires POTWs with a total design flow of greater than 5 million gallons per day that receive pollutants from industrial uses that pass through the treatment plant to establish a pretreatment program and authorize pretreatment plants for POTWs with lower design flows where, as here, “the nature or volume of the industrial influent, treatment process upsets, violations of POTW effluent limitations, contamination of municipal sludge, or other circumstances warrant in order to prevent Interference with the POTW or Pass Through.” 40 C.F.R. § 403.8(a).

<sup>221</sup> 40 C.F.R. § 403.5(a).

<sup>222</sup> Bridger J. Ruyle et al., *High Organofluorine Concentrations in Municipal Wastewater Affect Downstream Drinking Water Supplies for Millions of Americans*. 122 Procs. Nat’l Acad. Scis. U.S. Art. No. e2417156122, 1. <https://doi.org/10.1073/pnas.2417156122> (finding that even with advanced treatment technologies, maximum PFAS removal efficiency at 8 large wastewater treatment facilities was only about 25%); Wash. DOE, *PFAS in Wastewater* (“Nearly all municipal wastewater treatment plants have measurable levels of PFAS in their discharge . . . Available treatment technologies do not destroy PFAS. Some PFAS compounds can undergo transformation within the treatment plant, complicating the measurement of influent and effluent levels. And PFAS compounds will move around between the liquids and solids produced in current treatment processes.”).

<sup>223</sup> Christopher G. Scheitlin et al., *Application of Supercritical Water Oxidation to Effectively Destroy Per- and Polyfluoroalkyl Substances in Aqueous Matrices*, 3 ACS EST Water 2053 (2023), <https://pubs.acs.org/doi/10.1021/acsestwater.2c00548>.

<sup>224</sup> 40 C.F.R. § 403.5(a).

17. PFAS-containing waste generated by the Project, including wastewater treatment residuals or concentrate, shall not be incinerated, and shall be disposed of in a manner that minimizes the risk of PFAS releases to the environment.

### **Permit Conditions**

18. The SPDES permits issued to Micron and the IWWTP shall include effluent limitations and/or new source performance standards for all PFAS<sup>225</sup> that Micron knows or foresees will be discharged from the facility, including degradation byproducts that are PFAS. Consistent with New York and federal law, if neither EPA nor New York has developed effluent limitations, standards, or guidance values for a PFAS that Micron foresees discharging, NYSDEC should develop the effluent limitations and/or standards based on the best available technologies economically achievable using its best professional judgment.<sup>226</sup> The SPDES permits shall ensure that there is no degradation of the water quality as a result of discharges from the Micron facility or the IWWTP.
19. The SPDES permit issued to Micron shall require the use of Best Management Practices to control or abate the discharge of pollutants, including, but not limited, to “product

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<sup>225</sup> In this context, PFAS must be defined as any chemical in the class of chemicals containing “at least one fully fluorinated carbon [atom],” as New York State consistently defines this term. E.g., N.Y. ECL §§ 37-0203(6), 37-0101(7), 27-3301(8); N.Y. Gen. Bus. Law § 391-u(1)(f).

<sup>226</sup> 40 C.F.R. § 125.3(a)(2)(ii)-(v) (all non-POTW permits must, at a minimum, contain BAT effluent limitations based on best professional judgment); 40 C.F.R. § 122.44(a)(1) (all NPDES permits must include technology based effluent limitations and standards, including “case-by-case effluent limitations” when others are not available); 33 U.S.C. § 1342(a)(1)(B) (a discharge permit should include “such conditions as the Administrator determines are necessary to carry out the provisions of this chapter); *see also* EPA, *Technology-based Effluent Limits Flue Gas Desulfurization (FGD) Wastewater at Steam Electric Facilities*, attach. A in *National Pollutant Discharge Elimination System (NPDES) Permitting of Wastewater Discharges from Flue Gas Desulfurization (FGD) and Coal Combustion Residuals (CCR) Impoundments at Steam Electric Power Plants* at 2 (June 7, 2010), <https://www3.epa.gov/region1/npdes/merrimackstation/pdfs/ar/AR-1564.pdf> ) (“an authorized state must include technology-based effluent limitations in its permits for pollutants not addressed by the effluent guidelines for that industry. [citations omitted] In the absence of an effluent guideline for those pollutants, the CWA requires permitting authorities to conduct the ‘BPJ’ analysis discussed above on a case-by-case basis for those pollutants in each permit.”). As a state designated to implement the NPDES program, New York must adhere to these authorities (40 C.F.R. § 123.25) and does so. *See* N.Y. ECL § 17-0811 (McKinney 2024) (SPDES permits must include, where applicable, effluent limitations, standards of performance for new sources, and any further limitations to comply with water quality standards); 6 N.Y.C.R.R. §§ 750-1.11(a)(1–3). *See also* 6 N.Y.C.R.R. § 750-1.2 (“*Best professional judgement (BPJ)* means effluent limits authorized under the [Clean Water] Act . . . BPJ is the method used by permit writers to develop BAT or BCT limits or requirements on a case-by-case basis for pollutants and wastewaters not addressed by 40 CFR 405 to 471.”).

elimination or substitution when a reasonable alternative to using PFAS is available in the industrial process.”<sup>227</sup>

20. The SPDES permit issued to the IWWTP shall prohibit the land application of biosolids.
21. All renewals of environmental permits for the Project, including for the IWWTP, shall be based on a full technical and legal review of the permit terms and conditions, as opposed to administrative renewal.

## Conclusion

Across the state, millions of New Yorkers are living with the legacy of unregulated PFAS releases. In Hoosick Falls, PFAS released by Saint Gobain and other industrial polluters contaminated the air and water, resulting in an “increased risk [of] . . . developmental effects and . . . liver and immune toxicity.”<sup>228</sup> In Newburgh, PFAS exposures from a military base are linked to high blood pressure and high cholesterol.<sup>229</sup> Almost half of New York’s public drinking water systems are contaminated by PFAS,<sup>230</sup> and more than two-thirds of the inactive landfills in the state have unsafe levels of PFOA, PFOS, or both in their groundwater.<sup>231</sup>

With PFAS already costing the state up to \$4.4 billion in annual health care costs and millions in drinking water treatment and site remediation, we cannot afford for the Project to worsen New York’s PFAS crisis.<sup>232</sup> Instead, the Project should be a model of sustainable semiconductor production, and a demonstration that domestic microchip production need not come at the expense of our health and the environment.

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<sup>227</sup> Memorandum from Radhika Fox, Assistant Adm’r, EPA to Regional Water Div. Dirs., Regions 1-10, EPA Re: Addressing PFAS Discharges in NPDES Permits and Through the Pretreatment Program and Monitoring Programs (Dec. 5, 2022), [https://www.epa.gov/system/files/documents/2022-12/NPDES\\_PFAS\\_State%20Memo\\_December\\_2022.pdf](https://www.epa.gov/system/files/documents/2022-12/NPDES_PFAS_State%20Memo_December_2022.pdf); 40 CFR § 122.44(k)(4).

<sup>228</sup> ATSDR et al., *Health Consultation: Saint-Gobain Performance Plastics – McCaffrey Street: Village of Hoosick Falls Public Water System* at 25 (June 20, 2024), <https://www.atsdr.cdc.gov/HAC/pha/StGobain/St-Gobain-Hoosick-Falls-HC-508.pdf>; Scott Waldman, *New Hoosick Falls Blood Test Results Show PFOA Levels at 30 Times the National Average*, Politico (Aug. 4, 2016), <https://www.politico.com/states/new-york/albany/story/2016/08/new-hoosick-falls-blood-results-30-times-national-level-104516>.

<sup>229</sup> Shantal Riley, *Small City Pays a Price for PFAS In Drinking Water*, Sci. Friday (June 13, 2025), <https://www.sciencefriday.com/articles/pfas-health-study-newburgh-new-york/>.

<sup>230</sup> Sophie Clark, *Map Shows Which States Have Worst Drinking Water*, Newsweek (Dec. 10, 2024), <https://www.newsweek.com/pfas-forever-chemicals-lead-water-1998617>.

<sup>231</sup> NYSDEC, *New York State Inactive Landfill Initiative: Comprehensive Plan to Address Priority Solid Waste Sites for Potential Impacts on Drinking Water Quality* at 8 (July 2024), <https://dec.ny.gov/sites/default/files/2024-07/inactivelandfillrpt2024.pdf>.

<sup>232</sup> Nat. Res. Def. Council, *The Social Burden of PFAS “Forever Chemicals” in New York* (June 9, 2025), <https://www.nrdc.org/media/social-burden-pfas-forever-chemicals-new-york>.

NEPA and SEQRA provide the tools and the legal mandate to achieve those goals. We urge OCIDA and other involved agencies to fully evaluate the Project's PFAS impacts, to consider feasible alternatives and mitigation measures, and to require mitigation that eliminates significant adverse impacts by preventing PFAS releases and exposures.

Respectfully submitted,

CHIPS Communities United  
Judith Barish, Coalition Director

Earthjustice  
Jonathan Kalmuss-Katz, Senior Attorney  
Alana Reynolds, Associate Attorney

Natural Resources Defense Council  
Kate Donovan, Northeast Environmental Health

Sierra Club Atlantic Chapter  
Kate Bartholomew, Sierra Club Atlantic Chapter Chair

cc: Kevin Balduzzi  
Regional Permit Administrator, NYSDEC Region 7  
[dep.r7@dec.ny.gov](mailto:dep.r7@dec.ny.gov)

---

**From:** Kerney, Owen <okerney@syr.gov>  
**Sent:** Monday, August 11, 2025 3:58 PM  
**To:** chipsnepa@chips.gov  
**Cc:** Loh, Greg  
**Subject:** [EXTERNAL] City of Syracuse - Micron DEIS Comments  
**Attachments:** City of Syracuse\_MICRON DEIS Comments\_08112025.pdf

Good afternoon,

Please find attached the City of Syracuse comments on the Micron Project *Draft Environmental Impact Statement*.

We appreciate the opportunity to review and comment on this important project.

Thank you,  
Owen

**Owen Kerney**  
Deputy Commissioner, City Planning & Sustainability  
Dept. of Neighborhood & Business Development  
City of Syracuse  
300 South State Street, Suite 700  
Syracuse, New York 13202  
P: 315.448.8110



# DEPARTMENT OF NEIGHBORHOOD & BUSINESS DEVELOPMENT

CITY OF SYRACUSE, MAYOR BEN WALSH

August 11, 2025

Onondaga County Industrial Development Agency (OCIDA)  
U.S. Department of Commerce, CHIPS Program Office  
ATTN: Micron Project  
335 Montgomery Street, Floor 2M  
Syracuse, New York 13202

Via email: [chipsnepa@chips.gov](mailto:chipsnepa@chips.gov)

Dear OCIDA and CHIPS Program Office Micron Project DEIS Reviewers,

This letter is submitted on behalf of the City of Syracuse (the "City") to provide comments regarding the Draft Environmental Impact Statement (the "DEIS") for the Micron Semiconductor Manufacturing Project, prepared by the U.S. Department of Commerce, CHIPS Program Office (CPO), and Onondaga County Industrial Development Agency (OCIDA).

The City has and continues to be a strong and supportive partner of the Micron Project. The DEIS presents a thorough assessment of the proposed project and the connected project actions. Specifically, the DEIS report analyzes the reasonably foreseeable effects of the proposed project on various resource areas, analyzes the reasonably foreseeable cumulative effects of the proposed project, and discusses the unavoidable significant adverse effects and the irreversible or irretrievable commitments of environmental resources. Importantly, it also evaluates a range of alternatives and recommends appropriate mitigation measures for the project's impact on our region. We appreciate the opportunity to comment on this extensive report and have focused our comments on a few specific chapters of the report.

## **Economic Development**

As stated in the EIS, the socioeconomic effects of the Preferred Action Alternative would be significant and beneficial. The Proposed Project would generate substantial new economic activity in the local and regional study areas. It is projected that operations of a 4-fab facility would generate over \$10 billion in real GDP impacts within the regional study area, generate additional tax revenues for the local and regional study areas, invest \$500 million in local and regional initiatives that advance identified community needs, generate over 4,000 on-site construction jobs over the approximately 16-year construction period, and generate over 9,000 permanent on-site operational jobs.

**Commissioner**  
Michael Collins

**Deputy Commissioner of  
Neighborhood Development**  
Michelle Sczpanski

**Deputy Commissioner of  
Business Development**  
Eric Ennis

**Deputy Commissioner of  
Code Enforcement**  
Jacob Dishaw

**Deputy Commissioner of  
Planning and Sustainability**  
Owen Kerney

**Department of Neighborhood  
& Business Development**  
One Park Place  
300 South State St., Suite 700  
Syracuse, NY 13202  
Office 315-448-8100  
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**GROWTH. DIVERSITY. OPPORTUNITY FOR ALL.**

In addition to on-site benefits, the Proposed Project's construction and operational activities would generate off-site economic activity and additional jobs and labor income within industries supporting Micron's construction, and within governments and businesses supporting workers' day-to-day spending. It is anticipated that the Proposed Project would generate over \$2 billion in induced disposable personal income in the five-county region by 2035 and over \$3.3 billion by 2041. By 2045, the Proposed Project would generate demand for nearly 9,500 jobs at regional supply chain businesses and approximately 23,500 jobs at regional governments, institutions, and businesses supporting the growth in regional household spending (approximately 33,000 off-site jobs in total by 2045).

These would be direct benefits to the region, and the City. Syracuse could benefit from these new employment opportunities. New Micron related jobs will attract young professionals to the area. If 5% to 10% of those young professionals choose to live in the City, that would conservatively translate to 2,000 to 4,000 new households in the City, over the next two decades from this project alone.

During the past seven years, the City of Syracuse has led regional collaboration on workforce development and career training programs in industries essential to a success semiconductor industry: building and construction trades and technology and advanced manufacturing. Syracuse Build is the established and successful construction careers program, and Syracuse Surge, the city's strategy for inclusive growth in the New Economy, the high performing tech and advanced manufacturing program. We look forward to continuing to be a partner in these efforts to ensure they create opportunities for city and county residents.

This increase in households in the City and career opportunities would directly increase economic investment and neighborhood stability, a primary goal of the current administration and the City's recently completed Housing Strategy. We support the DEIS's conclusion that, "the Preferred Action Alternative would not result in any significant adverse effects with respect to zoning or public policies, and it would likely result in beneficial effects by fulfilling economic development policy goals."

### **Transportation**

The Preferred Action Alternative would result in significant adverse effects on transportation and traffic in the surrounding areas during certain periods of construction and operation. Many of these effects, however, would be addressed through mitigation measures developed with input from agencies with jurisdiction to implement such measures.

The DEIS indicates that transportation impacts are generally limited to the project study area, which would not directly affect the City, but we are supportive of the

recommended mitigations identified in the DEIS to mitigate the adverse traffic impacts. We also urge the project team to work in close coordination with Centro to provide robust public transportation service from the City of Syracuse directly to the project site. This service should be aligned with the anticipated Bus Rapid Transit system to make it possible for City residents to easily get to project related jobs with minimal harmful impact to transportation.

### **Environmental Impact**

Under Section 404 of the Clean Water Act and Article 24 of the Environmental Conservation Law, mitigation would be required to address the anticipated permanent losses of federal and State jurisdictional wetlands and surface water features. Under a proposed mitigation plan, Micron would enhance, establish, or restore a total of 422.14 acres of wetlands and 14,030 LF of stream features across six mitigation sites located within a nine-mile distance to the northwest of the WPCP, an approximately 2:1 mitigation ratio. Overall, approximately 1,341 acres of land within the Oneida River watershed would be protected in perpetuity under the mitigation plan. Additionally, Micron would purchase nine in-lieu fee program credits.

While the displacement of the wetlands in the proposed project area is not beneficial to the regional environment, the proposed replacement and restoration of new wetlands at a 2:1 ratio is valuable. We encourage the project team to meet or preferably exceed this ratio and provide these critical wetlands to support ecosystems affected by the proposed development.

Additionally, Micron's commitment to purchase 100% carbon-free electricity utilizing power purchase agreements and renewable energy credits (RECs) is worth noting. The report acknowledges the project's potentially significant impact on climate change, but it also identifies a variety of ways to decrease that impact and support renewable energy locally, something the City is supporting through the *Sustainable Syracuse Initiative*.

### **Water Usage and Capacity**

According to the DEIS, the Proposed Project would have no significant adverse effect on water usage and capacity, as necessary system upgrades, permitting, and infrastructure development led by Onondaga County Water Authority (OCWA) and local water authorities are expected to maintain adequate capacity. Wastewater treatment needs, including both sanitary and industrial wastewater, would be accommodated by existing and planned infrastructure, including construction of the Industrial Wastewater Treatment Plant (IWWTP), avoiding any significant adverse effects on wastewater treatment capacity.

There will be a significant water impacts in the region, but proposed system upgrades are planned by Onondaga County Water Authority. OCWA is designing its planned

infrastructure improvements with redundancy measures, including redundant parallel pipelines, and these features enhance infrastructure resilience, minimizing risks to service reliability during maintenance or emergencies. Further, under the preferred action alternative, the developer would commit to achieve up to a 75 percent water conservation rate by 2030 through on-site and off-site water reclamation, recycling, and reuse. Micron also is working with Onondaga County Department of Water Environment Protection to develop additional methods for off-site water reuse, including evaluating two sources of recycled water to further reduce the Proposed Project's anticipated demand for freshwater supply from OCWA.

### **Conclusion**

The City is encouraged by much of the DEIS report, specifically the expected economic growth, investment in the region, and positive impacts on jobs. These economic benefits are anticipated to help many communities work toward greater fiscal sustainability, including the City. We strongly encourage the project team, permitting agencies, and other project stakeholders to continue their efforts to reduce any and all potential adverse project impacts and work toward creative mitigation solutions to achieve this.

We thank the CPO and OCIDA for the opportunity to provide these general comments on the DEIS report. We appreciate the effort they continue to make in order to ensure the Micron Semiconductor Manufacturing Project benefits the entire Onondaga County region, and their focus on minimizing any and all potential impacts of the project. This project will launch the region into exponential growth in a variety of areas, and it will create a historic economic boost that will extend throughout Central New York.

Thank you for your work on this generational project for the City of Syracuse and the entire Onondaga County region.

Sincerely,

A handwritten signature in black ink, appearing to read "O. Kerney", with a stylized flourish at the end.

Owen Kerney  
Deputy Commissioner, City Planning & Sustainability  
Dept. of Neighborhood & Business Development  
City of Syracuse

---

**From:** Khadeejah Ahmad <kahmad@jobstomoveamerica.org>  
**Sent:** Monday, August 11, 2025 3:26 PM  
**To:** chipsnepa  
**Subject:** [EXTERNAL] public comments on Micron DEIS  
**Attachments:** 08112025133025.pdf

Please see the attached pdf for 10 individual CNY community members' comments on the Micron DEIS.

--



**Khadeejah Ahmad** (she/her)

Organizer, Jobs to Move America

M: 315-383-6602

[JobsToMoveAmerica.org](http://JobsToMoveAmerica.org)

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CHIPS Program Office, National Institute of Standards and Technology, U.S. Department of Commerce,  
[CHIPSNEPA@chips.gov](mailto:CHIPSNEPA@chips.gov)

Onondaga County Industrial Development Agency  
ATTN: Micron Project  
335 Montgomery Street, Floor 2M  
Syracuse, New York 13202

RE: Draft Environmental Assessment EISX-006-55-CPO-001

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, please consider that the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. I am asking you to extend the comment period to October 25, 2025, at a minimum, and noting that there has been no public response to a petition signed by over 1500 residents of the region asking the same. Based on my current understanding of the DEIS, I still want to highlight key environmental, social, and economic impacts as well as mitigation measures, which are insufficiently addressed in the DEIS.

In particular I am concerned about: How, SPECIFICALLY, MICRON  
WILL ADDRESS WATER USAGE & WASTE WATER  
TREATMENT. DUE TO OUR KARST TOPOGRAPHY  
HOW CAN WE PROTECT ONEIDA LAKE, RIVERS +  
LAKE ONTARIO & FINGERLAKES? (SPECIFIC TO  
OUR REGION NOT BOISE IDAHO OR  
MANASSAS, VA)  
EMISSIONS (AIR) MITIGATION,  
SPECIFIC TO OUR REGION DEALING WITH  
AIR POLLUTION & HAZARDOUS AIR POLLUTION  
HOW WILL THEY DEAL WITH CARBON  
STORAGE & TEMPERATURE CONTROL, DUE TO THE BASIC  
15-20 ACRES NEEDED JUST FOR PARKING



I also urge consideration and response to the following issues and concerns:

1. **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
2. **Protection of Air, Water, and Workers.** The DEIS does not detail how Micron will minimize contamination of air, water, and soil or protect worker health and safety given the intensive use of toxic chemicals, including forever chemicals, in semiconductor production. Micron must adopt detailed plans to minimize negative impacts to workers and ecological communities, including best practices to minimize use of toxic chemicals to ensure their appropriate handling, treatment, and disposal, and provide robust worker training and safety protocols.
3. **Greenhouse Gases:** The DEIS does not state how Micron will meet its own 100% renewable energy commitment or substantially mitigate the factory's enormous greenhouse gas emissions. Micron must create a comprehensive plan to generate or purchase renewable energy using wind and solar –and without relying on renewable energy credits or using renewable energy that is already on the grid – to meet New York State's climate change objectives and the requirements of the New York Green CHIPS Act.
4. **Affordable and abundant water and energy:** The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.
5. **Job Access, Housing & Transportation.** The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge

INCREASE IN POPULATION (HOUSING, TEMPORARY: OTHERWISE),  
THUS ALL UTILITIES, WATER USE, LAND USE (DANGEROUS  
OR NOT)

★ HOW, SPECIFICALLY, WILL MICRON ADDRESS ANY  
BECOMING A LOAD POCKET INSTEAD OF SUPPLIER?  
WHERE WILL OUR ENERGY COME FROM AND A WHAT  
COST PER HOUSEHOLD?

Name: Britney A Gonzalez  
Address: 185 Searlwyn Rd  
Syracuse, NY 13205.

Email: bea94@protonmail.com  
Date: 7/19/25

CHIPS Program Office, National Institute of Standards and Technology, U.S. Department of Commerce,  
[CHIPSNEPA@chips.gov](mailto:CHIPSNEPA@chips.gov)

Onondaga County Industrial Development Agency  
ATTN: Micron Project  
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Syracuse, New York 13202

RE: Draft Environmental Assessment EISX-006-55-CPO-001

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In particular I am concerned about: The timelines to create new ecosystems  
not being sufficient to rehome displaced wildlife before  
their homes are destroyed.  
Housing stock in NYS is generally old. Would Micron or  
NYS agree to Retrofit homes and buildings  
to decrease energy use from homes and  
Buildings? What will be done to eliminate  
Acid Runoff Reaching Limestone and causing  
degradation of the stone.

I also urge consideration and response to the following issues and concerns:

1. **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
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4. **Affordable and abundant water and energy:** The DEIS does not ensure Micron's massive energy and water use will not affect the affordability of energy and clean water nor ensure that ratepayers and tax dollars will not ultimately bear the cost of infrastructure upgrades and higher energy demands as a result of this project. The DEIS must clearly confront these issues.
5. **Job Access, Housing & Transportation.** The DEIS does not ensure communities with high poverty rates and individuals facing barriers to good jobs (e.g. education level, language, criminal record) will have meaningful access to workforce development, training, jobs, and career advancement at Micron particularly for production workers. Nor does the DEIS sufficiently address the public transit investments needed to reduce traffic congestion while ensuring job access for workers from disadvantaged communities. The DEIS indicates that there will be a huge

lack of transparency around what specific chemicals will be used in their processes and how they will be disposed of. As well as a lack of research on its effect on surrounding low income communities.

They are not committing to ensuring that the employees that interact with these chemicals being paid the 100k/yr jobs they are promising

Name: Julia Garcia  
Address: 185 Searlwyn Rd Syracuse NY 13205

Email: heavymetaljulie44@gmail.com  
Date: 7/19/25

CHIPS Program Office, National Institute of Standards and Technology, U.S. Department of Commerce,  
[CHIPSNEPA@chips.gov](mailto:CHIPSNEPA@chips.gov)

Onondaga County Industrial Development Agency  
ATTN: Micron Project  
335 Montgomery Street, Floor 2M  
Syracuse, New York 13202

RE: Draft Environmental Assessment EISX-006-55-CPO-001

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In particular I am concerned about: water usage, pollution, who  
is regulating.

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I also urge consideration and response to the following issues and concerns:

1. **Water and Ecological Resources.** The DEIS fails to adequately address hydrological and ecological issues, provide sufficient plans to restore nearby wetlands and mitigate on site wetlands loss, and address watershed and habitat destroyed by the project. The DEIS must provide additional analysis related to water quality, ground water, and surface water impacts (including seasonal variations, location and loss of surface water channels, springs, intermittent flows and streams, wetlands, swamps, and ponds). Furthermore, ecological features, soil types, and other related elements must be thoroughly assessed to consider the negative impacts from habitat loss.
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In particular I am concerned about: Energy usage for Micron Facility  
and the community at large specifically Syracuse  
Plan for <sup>New</sup> Housing to be built with ground  
heating systems, upgrade homes in Syracuse  
in 13202, 13204, 13207, 13206, 13208  
with new ground <sup>Heating</sup> systems and grants to  
offset the cost of building and  
upgrading. Water line - Lead Remediation  
the strain on the water source  
will cause issues for residents.

I also urge consideration and response to the following issues and concerns:

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In particular I am concerned about:

- 1) Electrical issues / electrical infrastructure <sup>(the current infrastructure is subject to periodic outages)</sup>
- 2) on-going upgrades to local infrastructure and its impact on surrounding environment and residential communities - how will that be implemented?
- 3) Concerns re during construction phases how residential transportation through the Rt 31 corridor (from Rt 481 - Rt 81) will impact nearby community - that stretch of road is insufficient for construction/personal travel mix, what will be done ahead of start of construction to facilitate the uninterrupted and safe flow of traffic?
- 4) Thoughts on AI (future use of AI) and how this will affect future employment opportunities?

I also urge consideration and response to the following issues and concerns:

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- increase in housing needs/migration and cost of housing equity disparities*
- o ? Electrical usage
  - o ? on-going upgrades to local infrastructure
  - o ? Hazmat issues

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In particular I am concerned about:

- Too vague on responses by Micron on Environment Impact Statement.
- full disclosure/transparency of potential hazardous/toxic chemicals and methods to properly treat water supply now and in the future
- commitment to maintain the highest safety standards to both the facility and their employees
- further clarification on how and timeframe for plans for displaced wildlife
- further clarification of how the power requirements will be met in the future and who will have to pay for increases in electricity rates. (also any "waste" issue(s))

I also urge consideration and response to the following issues and concerns:

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increase in population and housing needs.  
AND affordability.

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In particular I am concerned about: \_\_\_\_\_

GIVEN THE WELL-DOCUMENTED AND PERSISTENT RACIAL DISPARITIES IN HIRING AND ADVANCEMENT ACROSS THE TECH INDUSTRY, WHAT SPECIFIC, MEASURABLE ACTIONS IS MICRON TAKING TO CLOSE THESE GAPS WITHIN ITS OWN ORGANIZATION?

HOW DOES THE COMPANY HOLD ITSELF ACCOUNTABLE TO ENSURING PARITY, JUSTICE, AND REPRESENTATION AT ALL LEVELS?

\_\_\_\_\_  
\_\_\_\_\_

I also urge consideration and response to the following issues and concerns:

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In particular I am concerned about: Micron's carbon footprint.

In particular their use of energy; with all the roof acreage they should be installing solar panels on the roofs to have on-site electricity production to ease their useage of electricity from the grid.

Why can't they use more solar? what is/are the basis for not using solar?

George Lorefice

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In particular I am concerned about: \_\_\_\_\_

- Health issues from chemicals to workers and neighborhoods.
  - Water pollution to wildlife & humans
  - Toxic waste
  - Strain on electric grid
  - Air Pollution
- \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

I also urge consideration and response to the following issues and concerns:

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In particular I am concerned about: \_\_\_\_\_

- THE HUGE INCREASE OF IMPERVIOUS AREA -  
TO BETTER USE/COMPENSATE -
  - RAISED - MULTI STORY PARKING LOTS?
  - SOLAR PANELS ON BUILDINGS, OVER LOTS.
- HOW / WHAT PLANS ARE BEING MADE TO COMPENSATE FOR ENERGY CONSUMPTION -
  - WE WON'T BE EXPORTING AS MUCH
  - NUKE POWER PLANT AGING OUT
  - COST OF INCREASED SOLAR & WIND
- COMPENSATION FOR INCREASED HOUSING & TRANSPORTATION ISSUES
- INADEQUATE ~~THE~~ FACILITIES FOR PROCESSING WATER TREATMENT IN CLAY - BSH - FOR MORE HIGHLY TOXIC

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**From:** Peter King <pking271@pm.me>  
**Sent:** Monday, August 11, 2025 11:59 PM  
**To:** chipsnepa@chips.gov  
**Subject:** [EXTERNAL] Micron 2025 NEPA Comment  
**Attachments:** Micron-Comment\_Peter-King.docx

Hello CPO,

Sending here my comment on Micron 2025 Project in Clay, NY

Best regards,

Peter King, Syracuse NY

August 11, 2025

National Institute of Standards and Technology, Creating Helpful Incentives to Produce Semiconductors (CHIPS) Program Office (CHIPSNEPA@chips.gov)

Onondaga County Industrial Development Agency (OCIDA)

ATTN: Micron Project

Hello CPO and OCIDA,

I am here commenting on the following paragraph in the DEIS (Under Sec. 3.2.2.1 Geology)

"(...) No sinkholes were identified on the WPCP.

Bedrock was core-sampled at 13 test boring locations and verified to be sedimentary interbedded shale and dolostone, which is nonreactive to only slightly reactive to dilute hydrochloric acid (HCl). Karst topography (known for higher incidences of sinkholes) was not noted at the site. Steep slope and soil conditions at greater risk of landslides also were not identified at the WPCP. According to the 2019 Onondaga County Multi-Jurisdictional Hazard Mitigation Plan Update, the Towns of Clay and Cicero are located in areas with moderate susceptibility to landsliding but a low incidence of occurrence; only one small area in the center of the southern portion of Onondaga County has a moderate incidence of landslide occurrence.

The geologic conditions at the proposed Rail Spur and Childcare Sites and existing utility properties are substantially similar to those at the WPCP. Therefore, the existing seismic, sinkhole, and landslide risks at those locations is also low. "

The above analysis dismisses the potential for karst deformation here, by a) relying on site-specific core-sampling, and b) not finding 'karst topography'. Also, this section c) depreciates the Tully Mudslides of 1993 as a "moderate incidence of landslide occurrence".

The above analysis focuses mostly on landslides, while also reporting no sinkholes on the combined Micron-related sites.

However, the 1993 Tully Mudslides were far from moderate at the time. No human life was lost, but could easily have been, had the persons involved not exited their buildings (Croyle, 2016). I do completely agree, Clay and Cicero are low-lying areas, with little or no landslide risks.

However, in a New York Statewide Assessment of Karst, Kappel, Reddy and Root categorize most of northern Onondaga County as potentially evaporite karst (gypsum and halite), specifically 'Camillus Shale - gypsum' (Kappel et al 2020 > "Figure 1. Major geologic units in which karst may be developed in New York State", pg. 12 of 86). Kappel et al note how karst can develop more suddenly and unexpectedly in the partially and predominantly evaporite areas such as may include the Micron site, than in carbonate areas like limestone drumlins in Syracuse and further southward.

"Evaporite deposits of gypsum and halite associated with some shales are the most soluble of the common rock types... ..making the rocks relatively insoluble in relation to evaporite deposits. A major difference between carbonate- and evaporite-rock karst is the time it takes for karst features to develop. Karst in carbonate rock develops over years, decades, or centuries, but karst in evaporite rock can develop over days, weeks, or years (Johnson, 2007). "(pg.13 of 86.)

The DEIS identifies Lockport Group, (Guelph) Dolostone as bedrock around the White Pine (Micron) site. This could be 100% correct.

Kappel et al do observe,

"the Lockport Group is less likely to develop karst features. Some karst development in the form of sinkholes and springs has been documented in the Lockport Group but typically along bedding planes near the bedrock surface (Yager and Kappel, 1987). Regionally, the Lockport aquifer system is generally confined to these bedding-plane structures and the weathered bedrock surface."

However, the Camillus Shale layer is also nearby, where...

"The Camillus Shale has a thin bed of gypsum (3 to 5 ft thick) which has been mined north of the Onondaga Escarpment. It has been reported that small solutional conduits drained into these mines and some land-surface subsidence (bulk or sinkhole subsidence features) has also occurred as the mine openings collapse."

At least one study observed, gypsum mining occurred close by, just across I-81 towards Cicero (Chamberlain, et al, 2014).

Also, Kappel et al are clear, a landscape absent from overtly identifiable karst features, does not mean free from karst concerns.

"Although the extent of karst development is important for understanding the surface water-groundwater interaction in a karst terrain, "the number of karst features has little to do with the problems of groundwater flow and contamination in karst. In fact, sparse karst can give a false security. Some of the worst cases of groundwater contamination are in carbonates with only minor karst features" (Art Palmer, professor emeritus, State University of New York at Oneonta, written commun., 2016)." (Kappel et al 2020, pg.18 of 86.)

Given the above Karst concerns, I urge Micron to conduct the most thorough preventative planning contra flooding, water contamination, and other similar concerns. This planning should include stakeholders, especially those at risk from these events.

Micron has incorporated an adaptive management plan for addressing concerns about

Wetland changes and removal, as influencing Stormwater, Groundwater and Floodplains issues

during construction and regular operation, as described under Table 3.2-5 'Best Management Practices', and detailed under 3.3.4.2 Preferred Action Alternative (pp 3-78, 3-79). Adaptive management is probably the best way to address these concerns, but should also involve more stakeholders than

Micron, National Grid, OCWA, and OCDWEP. Given the karst risks described above, these stakeholders should also include nearby municipalities, especially those downstream from the Micron site, for example along the nearby Oneida River, Three Rivers area, and so on.

The incidence of strong storms is well documented in the area, in recent decades starting with St. Agnes Hurricane in the 1972 (Syracuse-Onondaga Planning Agency 1997). Given our current trends, only increases in precipitation are projected further on this century. Heavy precipitation is increasing in this area, as well as periods of near-drought, such as this summer 2025. These extreme swing conditions can provoke karst development, and dry out areas which would be more resilient to flooding if more constantly wet.

Thank you,

Peter King, Syracuse

## References.

Chamberlain, S. C., Lupulescu, M. V., & Hawkins, M. (2014). The Cicero Clay Pits, Onondaga County, New York. *Rocks & Minerals*, 89(5), 408-415.

Croyle, J. (2016, April 27). Throwback Thursday: "Mountain of mud" crashes down in Tully, destroys homes. Syracuse. [https://www.syracuse.com/vintage/2016/04/throwback\\_thursday\\_a\\_wall\\_of\\_m.html](https://www.syracuse.com/vintage/2016/04/throwback_thursday_a_wall_of_m.html)

Kappel, W.M., Reddy, J.E., and Root, J.C., 2020, Statewide assessment of karst aquifers in New York with an inventory of closed-depression and focused-recharge features: U.S. Geological Survey Scientific Investigations Report 2020–5030, 74 p., accessed July 19, 2020, at <https://doi.org/10.3133/sir20205030>.

Sporleder, B.A., Fisher, B.N., Keto, D.S., Kappel, W.M., Reddy, J.E., and DeMott, L.M., 2021, Methods of data collection and analysis for an assessment of karst aquifer systems between Albany and Buffalo, New York (ver. 2.0, July 2022): U.S. Geological Survey Scientific Investigations Report 2021–5094, 8 p., <https://doi.org/10.3133/sir20215094>

Syracuse-Onondaga Planning Agency. (1997). Framework for growth in Onondaga County. Syracuse Onondaga County Planning Agency.

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**From:** Peter King <pking271@pm.me>  
**Sent:** Monday, August 11, 2025 11:51 PM  
**To:** chipsnepa  
**Subject:** [EXTERNAL] Re: Micron 2025 DEIS comments  
**Attachments:** Micron DEIS comments\_Moving-People.pdf

Hello CHIPS CPO Office,

Please find a FINAL revision to the 2 comments submitted yesterday from Moving-People Transportation Coalition, on the 2025 Micron DEIS for Clay NY.

Thank you,  
Peter King, for  
Moving-People Transportation Coalition

----- Forwarded Message -----

**Subject:**Fwd: Micron 2025 DEIS comments  
**Date:**Mon, 11 Aug 2025 07:35:22 -0400  
**From:**Alex Lawson <[alexander.m.lawson@gmail.com](mailto:alexander.m.lawson@gmail.com)>  
**To:**Peter King <[pking271@pm.me](mailto:pking271@pm.me)>

----- Forwarded message -----

**From:** **Alex Lawson** <[alexander.m.lawson@gmail.com](mailto:alexander.m.lawson@gmail.com)>  
**Date:** Sun, Aug 10, 2025 at 10:37 PM  
**Subject:** Micron 2025 DEIS comments  
**To:** <[chipsnepa@chips.gov](mailto:chipsnepa@chips.gov)>

Please find attached comments submitted in response to the Micron 2025 Draft Environmental Impact Statement.

Sincerely,  
Alex Lawson

August 8, 2025

Onondaga County Industrial Development Agency (OCIDA)

ATTN: Micron Project

335 Montgomery Street, Floor 2M

Syracuse, NY 13202

To whom it may concern:

On behalf of the Moving People Transportation Coalition, I submit the following comments regarding the Micron Semiconductor Manufacturing Project, Clay, NY, Draft Environmental Impact Statement. Moving People Transportation Coalition advocates for a sustainable and equitable regional transportation system that prioritizes pedestrians, public transportation, and micromobility.

MPTC is particularly concerned with the environmental harms related to increased vehicle miles travelled (VMT) predicted in the DEIS. The DEIS predicts that the Micron project will increase regional VMT by 67 million miles travelled annually by 2041 (*DEIS Table 3.7-12, p.3-208*). This increase will result in additional greenhouse gas pollution including over 16,000 additional metric tons of CO<sub>2</sub> equivalent emitted annually by 2041. Increased VMT will also impose broader costs on the region including increased flood risk due to expanded impermeable surface area, worsening congestion, and additional traffic fatalities. For these reasons, local planning efforts including the City of Syracuse's Vision Zero initiative, Syracuse Metropolitan Transportation Council's Metropolitan Transportation Plan, and Onondaga County's Comprehensive Plan all aim to reduce VMT, and in that context, the anticipated increase in regional VMT expected to be caused by the Micron project requires substantial mitigation.

The DEIS proposes no mitigation for increased VMT. The DEIS considers VMT as a potential cause of traffic congestion in the immediate area of the project site and proposes a series of road widenings to mitigate that congestion. However, the DEIS anticipates that these proposed mitigations will actually increase VMT by 1 million miles annually by 2041 even while maintaining acceptable levels of service on the identified vehicle routes (*Table 3.7-12 and Sec. 3.11.3.4*). The proposed mitigations will also worsen the other environmental harms associated with increased VMT, including increased traffic fatalities and surface runoff. The DEIS disregards potential flood risks from increasing paved surface area (*Comment on > 3.11.3.4 Analysis of...Mitigations, 3.11.4 Summary of Impacts*).

A better measure would mitigate traffic congestion *and* other environmental harms caused by increased VMT by addressing VMT directly. Although Micron will inevitably attract more vehicles to the area, there is ample opportunity to mitigate VMT by encouraging mode shift. The DEIS predicts that Micron will only generate 80 bus trips and 80 bicycle trips daily.

Each of these figures could be improved by implementing a Transportation Demand Management (TDM) plan after Micron begins regular operation. Such a plan would encourage people travelling to the site—both employees and visitors—to arrive by some means other than driving themselves

alone. Micron can provide incentives for people who arrive by bus, bike, or who carpool to decrease VMT by reducing the total number of cars driving to and from the site. Measures could include providing more convenient parking spaces for carpools, charging for onsite parking, reimbursing bus fare, providing vouchers for the purchase of ebikes, and coordinating with Centro to subsidize useful bus service at shift changes. The TDM plan should be adaptive, by responding to ongoing data collection and reassessment by all stakeholders for meeting TDM goals, including traffic safety and reducing VMT. (*Comment*> *Sec. 3.11, Transportation*).

Micron currently names few transport-related agencies as “Involved agencies” (*Table 1.2-1*). However, Micron’s transportation footprint will affect more concerns than those agencies represent. Micron’s TDM should include Centro, Syracuse Metropolitan Transportation Council (SMTC), and other agencies as applicable. A more adaptive TDM enables more ongoing flexibility, including reducing VMT. (*Comment*> *Sec. 3.11, Transportation, 1.2.2 Participating Agencies and Entities*).

Measures such as these would fulfill the requirements identified in the NYS Green CHIPS program to “plan for supporting public transportation or alternative transportation options for employees” including “measures supporting smart growth, integrating facilities into public transportation services, and providing incentives for businesses to accommodate non-vehicular commuting, including employee-based trip reduction programs, low/no-cost transit passes for employees, micro-transit options for employees, ride-sharing programs, bike-sharing, and scooter-sharing; and cycling accommodations.” (*Green CHIPS Sustainability Plan, NYS Empire State Development*). (*Comment*> *1.1.2 Micron Purpose and Need, Table 1.2-1 State and Local Involved and Interested Agencies*).

These measures will also reduce the need for surface parking at the site—the DEIS anticipates an unreasonable 12,000 parking spaces which will destroy wetlands and increase runoff—and it will further reduce indirect VMT increases by eliminating the need for proposed road widenings. (*Comment*> *Sec.3.3 Water Resources, > 3.3.4.2 Preferred Action Alternative*).

There is still a need for further mitigation measures to address the regional increase in VMT predicted to result from the Micron project. Micron, the New York State Department of Transportation and Onondaga County should mitigate the growth-induced effects of increased VMT by building regionally significant bike and pedestrian infrastructure, expanding access to ebikes and other micromobility devices, and improving public transportation service across the region. (*Comment on Sec. 3.11, Transportation*).

Sincerely,

**/s/ Alex Lawson**

Alex Lawson

Steering Committee Chair

Moving People Transportation Coalition

---

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**Sent:** Monday, August 11, 2025 11:51 PM  
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Sincerely,

**/s/ Alex Lawson**

Alex Lawson

Steering Committee Chair

Moving People Transportation Coalition

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**From:** Dick Kornbluth <dick@dickkornbluth.com>  
**Sent:** Monday, August 11, 2025 6:35 PM  
**To:** chipsnepa@chips.gov  
**Cc:** aggielane340@gmail.com; Bonita Siegel; Emmanuel Henderson; Hillary Warner  
**Subject:** [EXTERNAL] Comments on Micron DEIS  
**Attachments:** Micron DEIS Comments\_UJTFS.pdf

Comments are attached

Best,

Dick Kornbluth



## MICRON SEMICONDUCTOR MANUFACTURING PROJECT, CLAY, NY, DRAFT ENVIRONMENTAL IMPACT STATEMENT (JUNE 2025)

This document provides comments on the Draft Environmental Impact Statement (DEIS) by Urban Jobs Task Force of Syracuse, 224 Harrison St, Suite 210, Syracuse, NY 13202, [urbanjobstaskforcesyr@gmail.com](mailto:urbanjobstaskforcesyr@gmail.com)

### 1. Wetlands

- a. Micron will destroy about 200 acres of wetlands.
- b. These wetlands have many benefits
  - i. Habitat for endangered species, including the **Indiana bat** and the **Northern Long-eared Bat**, both of which are listed as endangered species under federal and New York State law. Other bat species detected on the site include the little brown bat, big brown bat, tri-colored bat, eastern red bat, hoary bat, and silver-haired bat.
  - ii. Many species of insects and birds
- c. What is Micron proposing
  - i. Replace wetlands with a series of unconnected parcels that will develop over time into wetlands. This development could take a generation. What does that mean for the flora and the fauna whose habitat has been destroyed?
- d. The area around the plant site is prone to flooding. The wetlands provide a buffer to manage surface water during heavy rain. The existing plant will cover 1400 acres between the buildings, the parking lots and other hard surfaces. There has already been testimony at public hearings that flooding is an issue in the area around the location of the proposed Micron plant. This is in spite of the presence of the wetlands which help to reduce flooding by providing a water sink during heavy rains. However, no mention has been made in the DEIS of settling ponds to deal with water runoff or other efforts to mitigate the clearly increased potential for flooding in the area.
- e. The DEIS proposes parking lots capable of handling 12,000 vehicles. According to a calculation by the University of Tennessee ([University of Tennessee Parking Calculation](#)), one acre of land can accommodate about 150 standard sized cars. For a parking lot accommodating 12,000 vehicles, that translates to about 80 acres. However, the actual area required is likely to be at least 90 acres. We are proposing a significant role for mass transit to bring workers to the plant and hopefully reduce the parking requirements by at least 50%. This will reduce hard surfaces by at least 45 acres and subsequently reduce water runoff mitigation required. In addition, we propose using porous surface material in the parking lots and internal roadways to further reduce runoff.

## 2. PFAS and other chemical compounds

- a. PFAS refers to a family of chemicals that are highly toxic and chemically stable (thus the nomenclature “forever chemicals”) There are over 10,000 thousand of these compounds and only a few have been characterized. Only two of these compounds are currently listed as toxic by the EPA, PFOA and PFOS
  - i. There is no identified lower limit to their toxicity. A few parts per trillion is still considered toxic
- b. They will be used in the chip-making process
- c. They will be present in the wastewater that will be sent to the improved Oak Orchard Water Treatment Plant in Clay. The treated water will be discharged into public waterways which will eventually lead to the Oswego River and Lake Ontario. The discharge point in Lake Ontario is within 2 miles of the intake ports for domestic water from Lake Ontario for Onondaga County.
- d. It is unlikely that the PFAS in the water passing through that plant will be removed by the processes in the plant.
- e. PFAS will also be present in solid waste that will be removed from the site to a landfill, not yet identified. Micron must ensure that no PFAS can enter the ground and potentially contaminate the existing water table.
- f. Many other hazardous chemicals will be used in the Fabs. Some, but not all, have been identified by Micron. Many have not.
- g. Micron must use the most effective processes to destroy PFAS and other toxic chemicals before they leave the plant, regardless of their cost. No PFAS must be allowed to enter the public waterways of New York State.
- h. Micron must also plan to invest in improved PFAS destruction processes as they become available over time.

## 3. Energy

- a. Micron will use as much electricity as the states of Vermont and New Hampshire combined, or the equivalent of more than 1 million homes or the entire output of a nuclear power plant.
  - i. By itself, Micron will increase the state’s energy usage by 5%
- b. Micron is subject to the provisions of New York’s landmark CLCPA legislation, which requires zero greenhouse gas emissions from electricity generation by 2040.
- c. Micron has pledged to use 100% renewable electricity
  - i. The only way it can do this is by increasing renewable energy through solar, wind, and geothermal generation.
  - ii. Renewal energy credits do not actually increase generation and should not be allowed to meet the goal of 100% renewable energy.
- d. Micron should not use electricity from existing nuclear power plants. All that does is divert that electricity from other users and does not increase generation. Although nuclear power does not generate greenhouse gases during the electric generation process, large amounts of nuclear waste are generated and the time it will take and the cost to build the nuclear generating plant could be used to create sufficient renewable energy sources that will meet Micron’s needs without the negative effects of nuclear power.

- e. The DEIS does not ensure that Micron's massive demand for water and electricity won't result in increased costs for ratepayers in terms of increased water and electricity rates. The DEIS must address the potential for these increases and ensure that they do not burden New York's residents with them.

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**From:** jan kublick <jan.kublick@gmail.com>  
**Sent:** Monday, August 11, 2025 2:12 PM  
**To:** chipsnepa@chips.gov  
**Subject:** [EXTERNAL] Micron DEIS Comments  
**Attachments:** Micron DEIS Comments.pdf

## Comments on Micron DEIS submitted by Jan Kublick

1. Climate Change Action and Awareness (CCAA) is the largest local group focusing on all aspects of Climate Change. While I am a member and a committee chair of CCAA, these comments are mine alone, and in the case of those on energy and climate, are in support of, and a supplement to, CCAA's comments.

2. I have practiced environmental, land use, real estate, and municipal law in Syracuse for 46 years. I have had the privilege to be a member of the Executive Committee of the Environmental and Energy Law Section of the NYS Bar since the Section was started in the early 80s. I have been involved with SEQR since its earliest regulations for the last 50 years, and am very familiar with its goals, requirements and case law. I currently serve as its Adirondacks and Natural Resources Co-Chair, and am a Board member of the College and University Alumni for a Sustainable Planet (CUSP) and a founding member of Dartmouth Alumni for Climate Leadership. Nevertheless, these comments are mine alone and do not reflect those of any of the mentioned groups.

3. The Project offers undeniable economic and social benefits for the region. It also brings with it substantial adverse environmental impacts which under SEQR must be avoided or minimized to the maximum extent practicable. In my opinion the Micron project is both highly desirable from a social and economic perspective and not nearly good enough from an environmental perspective to be approved as presented without extensive findings and clear and substantive conditions to identify and mitigate adverse environmental impacts over the 16 year buildout of the Project and its operation for generations to come.

4. My focus will be on two important issues, climate and energy, and air and water emissions of fluorinated chemicals, which is both a climate issue, and a major issue for public health due to growing scientific and regulatory scrutiny of, and widespread concern for, the human health effects of such chemicals. There are many other issues of concern and many other comments on the DEIS from individuals and groups including those of CCAA, and other Involved Agencies which must be addressed in the SEQR process with many embodied in conditions to the approvals needed for the Project to proceed.

## CLIMATE AND ENERGY

5. The Project will demand an enormous and growing share of the State's renewable energy capacity, and it will produce prodigious amounts of GHGe by its combustion of natural gas, challenging the attainment of the State's GHGe reduction goals. These are hugely important issues, for the reasons acknowledged in the DEIS itself. GHGe emissions are already altering the world's climate systems, with catastrophic consequences already seen both in New York and throughout the world. As the DEIS acknowledges, New York is one of the few states taking meaningful steps to lessen GHGe emissions and foster a transition to a modern fossil free economy. Micron must take all available steps now and over the years of design, construction and long term operation of the Project to help the State achieve the goals of the CLCPA.

6. SEQR allows for the approval of the Project despite significant adverse impacts, but it also clearly requires all Lead and Involved Agencies to make findings and impose conditions that avoid or mitigate those adverse environmental impacts to the maximum extent practicable. SEQR does not require that a project with significant adverse impacts be denied, but it empowers all Lead and Involved Agencies to require mitigation of those impacts as conditions of approval. (617.11(d)(5)). This is SEQRA's substantive dimension, long recognized in New York. Moreover, recent amendments to the SEQR regulations require specific findings and hence, specific conditions, concerning energy and climate. (617.9 (b)(5) (iii) (e) and (i) respectively).

7. The first phase of the Project will take five years to come on line, and throughout the entire DEIS there are promises by Micron to work to improve the Project, to employ Best Management Practices, including from an energy and climate point of view. Those commitments need to become conditions of approval, and there need to be measurable action forcing mechanisms by which opportunities for improvement are openly discussed with the Lead and Involved Agencies on a scheduled and public basis. As well there should be requirements that there be a means for local groups, communities and citizens to bring ongoing, or unanticipated, concerns to both the Involved and Lead Agencies, and to Micron.

8. The SEQR process contemplates that new information, new opportunities for improvements and new environmental issues will develop even before the first phase is built. Moreover, the duration of the construction of the overall project is 16 years. Fab 3 and 4 will be constructed many years in the future. It should be a condition of approval that a Supplemental EIS be drafted and reviewed when the Fab 3 and 4 project is under design. It is inevitable that changes in the industry, the communities affected, climate and environmental needs, impacts, and opportunities will have changed over that time. SEQR requires a new hard look at the Project when the new phase is under review. The SEQR review that is embodied in this DEIS is not and may not legally be a 'one and done' process. In fact, while avoidance of segmentation requires the full build out be considered now, the impacts of the second phase of the project are in the nature of a Generic EIS, as they are speculative and uncertain. Even more importantly, environmental concerns, requirements and opportunities will certainly change and evolve in the next decade, all of which necessitates a Supplemental DEIS. (617.9 (a) (7)).

9. The Project requires a huge quantity of energy, both fossil, in the form of natural gas, and electricity. The statement by Micron that it is using renewable energy is true. That renewable energy is already available and now largely exported out of the Zone C area to other parts of the State to offset fossil energy with renewable energy. In the short run, there appears to be no alternative to this, but it does impede the State in attaining its CLCPA emissions goals. In essence it provides an important economic development project for this region, while challenging the State's larger climate goals. The DEIS simply mentions that Micron will in part fulfill its requirement to use renewable energy by acquiring Renewable Energy Credits, but does not discuss the climate effectiveness of doing so, nor the current or future state of the market for purchasing them. This is an important omission and should be corrected. In Micron's CLCPA

Compliance Analysis, Micron is admitting that its enormous fossil and renewable energy demands will require waivers from the Climate Act's requirements. Those waivers must come with conditions for Micron to sharply reduce its GHGe emissions over the next 16 years in order to assist the State meet its climate and energy goals. During that time the State will be attempting to meet both GHGe emissions reduction and related renewable electrification goals, while balancing the need for ever more energy from data centers, high tech manufacturing, personal consumption for cars and for increasing climate-driven air conditioning. Micron is such a significant source of GHGe emissions that it must be required to be a partner in the State's crucial transition to renewable energy and lower GHGe emissions.

10. Approval decisions must attempt to mitigate the Project's increased emissions from burning fossil fuel and acquiring electricity, some of which will be generated by fossil fuel sources. To begin with, the Project is not proposing to construct any meaningful amount of renewable energy generation. Each proposed Fab will have 600,000 square feet of roof. Each Fab therefore has nearly 14 acres of rooftop. Some of that acreage could be used to install rooftop solar. Micron has done this in other Fabs, notably in Singapore. It is therefore a practicable mitigation by definition. The buildings can be designed to do so. The production on site of electricity for onsite use is a practicable mitigation of some of the Project's electrical use. The Campus is also more than large enough to provide space for co-located solar, wind or advanced geothermal renewable energy production. Certainly the Campus could be designed to provide room for and capacity for future onsite generation, and for extensive battery storage, even if not presently in the plans. Moreover there is no commitment by Micron to seek out and purchase local renewable energy from projects not yet proposed. Such agreements from local renewable sources would lower Micron's need to use electricity from public utility sources, and would stimulate further economic development, and the growth of renewable energy in the State. Any approval decisions must condition approval on efforts now and in the future to generate on site electricity and to explore all avenues to lessen reliance on the combustion of fossil fuel on site and off. Another condition could require Micron to provide electric vehicle charging capacity scalable to service the entire workforce, and to provide on site generated electricity free of charge to encourage employee transition to EVs, an important goal of the CLCPA and the State's Energy Policy. Another condition could be to provide electric vans to pick up workers at designated areas to lessen miles driven by them, an approach adopted by tech companies elsewhere.

11. Reducing GHGe emissions and transitioning to renewable energy is one of the State's, and the world's, most important priorities. SEQR requires a specific finding on this issue. The decision to approve the Project must require Micron to improve its present proposal, to work diligently to further reduce its GHGe footprint and to generate renewable energy and provide storage capacity for it. In addition, before proposing the second phase of the project, Micron must be required to address the issue with a Supplemental EIS, reflecting both the significance of the issue and the dynamic changes that are certain to take place in the next five to ten years. Climate impacts are going to increase at an accelerating rate. Energy demand will increase dramatically as well. New technologies in chip production, renewable energy production, and battery storage will all accelerate. Renewable energy generation is already the cheapest way to

generate electricity and that will continue to improve, with the co-benefit of slowing climate change and its catastrophic impacts. As noted above, all approval decisions must require more of Micron on this issue, now and in the future development of the Project, and to the maximum extent practicable the Project should be designed to be better in the future, including providing for current and future production and storage of renewable energy.

#### POLY AND PER FLUORINATED CHEMICALS (PFCs)

12. Approval decisions should impose a requirement for rigorous establishment of baseline conditions in the local air, water and soil for all chemicals that foreseeably will be introduced to the environment by the Project. The collection and public availability of the baseline data must be assured. This is especially true of data for air emissions of PFCs that also pose a climate risk due to their tremendous heat capturing potential in the atmosphere.

13. Scientific studies strongly suggest many health risks are caused by PFCs as well. Any PFCs that are not removed by Micron from the waste water stream will have to be thoroughly removed at the downstream County treatment plant, likely by very expensive reverse osmosis. The DEIS admits that Micron does not know the details of the County's plans for its new treatment plant. That seems a major omission in the overall water treatment plan analysis and will certainly require the County to prepare its own DEIS soon. It appears from the DEIS that Micron is promising to lessen the release of such chemicals to the environment. An approval decision on the Project must mandate that those efforts occur and be shared and reviewed by the relevant Involved Agencies including OCIDA and the County. There should be regular mandated comparisons of current levels to baseline levels of these chemicals. Provisions for Micron to pay the cost of review of these efforts, and the public availability of this data will be critical to the public's confidence in it and likely work to lessen the cost to the taxpayers

14. PFCs are known or suspected of serious adverse health effects. The chip fabrication process, according to Micron, has few alternatives to PFCs for current chip manufacturing. To the greatest extent practicable, Micron must be required, as a condition of approval, to avoid the release of PFCs to the environment. This is especially true of the water waste stream, as released PFCs will then become the responsibility of the County to remove, at taxpayer expense, without the possibility of landspreading the biosolids that result. PFCs in biosolids have already badly polluted farming operations in other states, most notably Maine. Onondaga County has a legacy of environmental contamination by industry, much of it before the harm was fully understood. All Involved Agencies, but especially the County have the opportunity, and the duty, to avoid a repeat of this history.

15. The issue of PFCs is a particularly difficult one. Micron's process already involves the use of a wide range of PFCs. Some PFCs are already known to be harmful, and there is active scientific research, much of which points toward all PFCs posing human health risks. At the very least it is true that releasing PFCs to the air, water and onto the soil is an area of great concern and major scientific uncertainty, including about chemicals created and released by incinerating them, as Micron is proposing. SEQR specifically provides special requirements when this

condition is met. It requires that the uncertainty be acknowledged and the state of scientific knowledge be summarized (617.9(b)(6)). A recently published book entitled *Poisoning the Water: How Forever Chemicals Contaminated America* by Sharon Udasin and Rachel Frazier, 2025, contains an extensive bibliography and footnotes that provide current citations to this quickly evolving scientific field. Also, the nationwide group Beyond Plastics maintains a list of current articles at this link: (<https://www.beyondplastics.org/reports-studies>). 1112 of the Public Health Law already addresses 1-4 Dioxin and EPA and DEC have a very low allowance for several PFCs. The State has already restricted the use of PFAS in apparel and other products and the Legislature unanimously banned PFAS and other toxins from menstrual products (S1548/A1502) (the bill is waiting for the Governor's signature) and the Legislature is proposing to address 23 different PFCs in the Packaging Reduction and Recycling Infrastructure Act (S1464/A1749). That PFCs are chemicals of great concern and potential catastrophic impacts on the environment, and not yet fully understood, cannot be denied, ignored or avoided.

#### SUMMARY:

16. This is a Project that will be approved. But it should be approved with express and enforceable conditions that avoid or mitigate adverse environmental impacts, and require ongoing consultation and improvements consistent with Micron's promises to do exactly that. SEQRA in 617.9 b( 5)( e), and(i) specifically address the requirements for Lead and Involved Agency findings and decisions regarding both energy and climate change. Those sections require the agencies to make decisions with conditions to assure mitigation to the maximum extent practicable on these issues.

17. Such conditions should include establishing baseline pre-project levels of the presence of all chemicals to be used by Micron, and an ongoing verified and public monitoring system of the presence of those chemicals in the environment. This includes both criteria chemicals required for permits, but also levels of chemicals which are not currently permitted. This is especially true of PFCs of all types used or to be used by Micron. Conditions should include requiring Micron to capture all air and water releases of PFCs, whether currently required by permit or not. It is possible and practicable to remove all of the PFCs from water effluent. Micron should be required to do so.

18. A condition should be imposed requiring that Best Management Practices aimed at reducing and eventually eliminating Scope 1, 2 and 3 GHGe emissions, and requiring periodic collaboration between the Lead and Involved Agencies and Micron in a manner that assures all opportunities are explored. This should include the right of local communities and the public to participate, and to provide input on both new opportunities and new impacts over the entire life of the Project, and especially during the design and approval of the second phase of the Project.

19. Conditions of approval should clearly require a Supplemental DEIS under 617.9 (a)(6) at the time of review and approval of Fabs 3 and 4. As noted above, detailed information about the second phase of the Project, and information about the outcome of construction and operations

at Fabs 1 and 2, the regulatory landscape, the state of renewable energy technology and storage, manufacturing technology and innovations and the State's progress on climate change, including the inevitably worsening effects of climate change are presently unknown and unknowable. SEQR requires an updated look at all issues before the second phase is permitted.

20. In conjunction with local approvals subject to SEQR, all Involved Agencies must also make findings and render decisions on the environmental issues raised, including the Economic Development Council which, under the Green Chips Act, must find that the Project will mitigate its greenhouse gas emissions over its lifetime. That Plan must account for mitigating both the Scope 1 emissions from burning natural gas, but also the Scope 2 emissions from the fossil fuel component of its electrical demand. Mitigation should mean to mitigate to help meet the State's GHGe targets and the State's renewable electric targets of 70% renewable by 2030 and 100 by 2040. To do so would be to require Micron to reduce and eventually phase out fossil fuel use as quickly as practicable and to produce or acquire its electric supply from renewable sources as soon as possible.

21. CCAA looks forward to reviewing responses to the substantive comments raised, and to permit decisions that respond to the wide range of issues raised by the public and involved agencies. CCAA, and all of the groups and individuals who provided comments will remain interested and involved in the ongoing design, construction, permitting and operations of Micron. Conditions of approval should, at every turn, make that interest and continued involvement easier. Data should be made easily available. Reports should be provided regularly, so that the public is given a means of informed participation.

22. The benefits of the Project are great, for the State, the region, and especially for the County. Nevertheless, Micron's environmental impacts will burden the County and its communities for generations. As a condition of approval, the County and the benefitted local communities should commit to concrete steps to reduce GHGe emissions across the County and the Region, which also is greatly benefitted by the Project. Those GHGe emissions are produced directly and indirectly by the County, by local governments, and by individuals. Renewable energy projects should be sited and approved to help offset Micron's GHGe Scope 1, 2, and 3 emissions. Perhaps most importantly, the County and the communities benefitted should provide information and encourage public understanding of climate change, and the importance of reducing GHGe emissions, not just for the world, but for the State and the County as well.

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**From:** michael kwiek <mikekwiek@gmail.com>  
**Sent:** Monday, August 11, 2025 4:48 PM  
**To:** chipsnepa@chips.gov  
**Subject:** [EXTERNAL]

Email to Micron (today is the last day) before they f up our beautiful CNY water with their lackluster poor planning. Email questions to: [CHIPSNEPA@chips.gov](mailto:CHIPSNEPA@chips.gov)

Mine:

Why didn't you want to hold more public hearings on environmental impacts?

Why are you not extending the deadline as requested?

That doesn't seem like a good partnership to me.

Ever see the movie Erin Brockovich? That's what the plant and lack of planning for true and very real environmental concerns reminds me of. Your plant and jobs are not wanted here if you can not transparently disclose everything you are doing about every question below. Our area is beautiful and you're about to screw it all up if you don't take this seriously. Go somewhere else if you can't figure all of this out with careful planning and full disclosure of those detailed plans BEFORE you take any further actions or touch our pristine area. Most of us do not want this so the lack of proper planning and disclosures just makes it even worse.

#### 1. Water usage and quality

Clarification on wastewater discharge: Micron initially projected discharging 4 million gallons of wastewater per day, which was later revised to 8-20 million gallons/day. What factors contributed to this significant increase, and what further details can be provided on the anticipated volume and composition of the discharge?

Wastewater treatment effectiveness: While Micron plans to build an on-site pretreatment plant and utilize the county's expanded wastewater treatment facility, details on the specific technologies and expected effectiveness in removing all pollutants, especially "forever chemicals" (PFAS), remain unclear. How will Micron ensure the complete and safe removal of all hazardous substances before discharge into the Oneida River, and will regular, independent monitoring be conducted to verify treatment effectiveness?

Contingency plans for spills and leaks: Given the significant volume of chemicals stored and used on-site (up to 56 million gallons of corrosives), what are the comprehensive contingency plans and emergency response procedures in place to prevent and manage potential spills or leaks, particularly

into water sources like Lake Ontario and surrounding wetlands?

Transparency on chemical usage: Public concern exists regarding the lack of transparency about the specific chemicals Micron will use in its production process. What steps will Micron take to disclose this information, recognizing the potential impact on public health and the environment?

## 2. Air quality and greenhouse gas emissions

Greenhouse gas emission mitigation: The DEIS estimates Micron's annual direct and indirect CO<sub>2</sub> emissions at nearly 5 million tons, potentially threatening New York State's climate goals. While Micron pledges to purchase carbon-free electricity, concerns exist regarding the feasibility and impact of acquiring such a large amount of renewable energy credits and power purchasing agreements in New York State. What concrete steps will Micron take to ensure its operations align with the state's climate goals, and are they actively exploring on-site renewable energy generation beyond the proposed rooftop solar panels?

Air emission monitoring and control: What specific technologies and protocols will be implemented to monitor and control air emissions, especially hazardous air pollutants, from the manufacturing process and supporting facilities (e.g., bulk gas yards)? How will Micron ensure these measures are consistently effective in protecting local air quality?

## 3. Land use and habitat impact

Wetlands mitigation effectiveness: Micron plans to destroy over 200 acres of wetlands and create/restore hundreds of acres elsewhere as mitigation. What measures will be in place to ensure the created/restored wetlands adequately replace the ecological functions and biodiversity of the destroyed wetlands?

Habitat preservation and management: Given the presence of endangered and threatened species like the Indiana Bat on the project site, what long-term measures will be implemented to protect remaining habitat areas, ensure the effectiveness of conservation easements, and minimize disruptions during construction and operation?

Forest and grassland loss mitigation: The DEIS projects the loss of over 10,000 acres of forests and grasslands due to Micron and associated development. What strategies will Micron implement to reduce or offset this loss, particularly considering the role these ecosystems play in carbon sequestration and biodiversity?

## 4. Community impacts and sustainability

Affordability of energy and water: Micron's significant energy and water demands raise concerns about their impact on the affordability and availability of these resources for the wider community. How will Micron ensure their operations do not disproportionately burden residents through increased utility costs or resource scarcity?

Local infrastructure and emergency services: The massive scale of the project will strain existing infrastructure, including roads, utilities, and emergency services. While plans for infrastructure improvements are mentioned, details are lacking on Micron's contributions to these costs and how impacts on services like emergency response will be managed, particularly during a potential chemical incident. We deserve to see the full plan, what is your plan?

Sustainable development goals and metrics: Micron has committed to sustainable development goals within the Green CHIPS incentive program, such as reducing greenhouse gas emissions and expanding water restoration efforts. What specific, measurable metrics will be used to track progress towards these goals, and how will Micron ensure regular public reporting on these metrics?

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**From:** Louis J. Lamit <morchella8@gmail.com>  
**Sent:** Monday, August 11, 2025 4:51 PM  
**To:** chipsnepa  
**Subject:** [EXTERNAL] Forever chemical concerns

Hi, I am a citizen of DeWitt New York, near Syracuse. In the Micron Draft Environmental Impact Statement (<https://ongoved.com/microndeis2025/>) for the Clay New York proposed facility, it seems that the plan is not to fully filter the water of per- and polyfluoroalkyl substances (e.g., see page 3-83 of the draft statement). In fact, in some cases perhaps they are just “monitored” and not ever really filtered by Micron. In general, it also seems that a lot of the treatment of wastewater will be done by public facilities, which seems like a tax and infrastructure burden to local citizens. There is a very long history of industry driven environmental damage in Central New York State, and I think Micron could choose to be a continuing part of the legacy or be a force of positive change. Please invest more into fully filtering the water waste from the facility. Dumping lots of forever chemicals into the Oswego River watershed and therefore Lake Ontario, seems like a horrible environmental catastrophe that will have negative impacts for many centuries on the people that live in the region. Please be a good company and citizen in this new location you seek to move to.

Jamie Lamit  
DeWitt, NY

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**From:** Louis J. Lamit <morchella8@gmail.com>  
**Sent:** Monday, August 11, 2025 4:52 PM  
**To:** CHIPSNEPA@chips.gov  
**Subject:** [EXTERNAL] Micro mitigation ration is too low

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Hi,  
I am a citizen of DeWitt New York, near Syracuse. In the Micron Draft Environmental Impact Statement (<https://ongoved.com/microndeis2025/>) for the Clay New York proposed facility, the wetland mitigation ratio is only 2:1 (see page (3-92 and 3-93 of the impact statement). Wetland mitigation ratios are typically at least 3:1 or higher because the wetlands created offer far lower quality habitat and ecosystem services than the natural ones that were destroyed. Given the massive tax incentives and other perks that Micron has received for the project, why is the mitigation ratio not higher? Micron stands to gain an enormous amount of profit from this facility and it seems like small potatoes to raise that ratio above 2:1. There is a very long history of industry driven environmental damage in Central New York State, and I think Micron could choose to be a continuing part of the legacy or be a force of positive change. In the long-term, the loss of wetland area has a vast cost compared to keeping it unmodified, which will be a burden to the people of the region and beyond. Please increase your mitigation ratio.

Jamie Lamit  
DeWitt, NY

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**From:** Louis J. Lamit <morchella8@gmail.com>  
**Sent:** Monday, August 11, 2025 4:51 PM  
**To:** chipsnepa  
**Subject:** [EXTERNAL] Forever chemical concerns

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Jamie Lamit  
DeWitt, NY

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**From:** ricecracker <ricecracker@bellsouth.net>  
**Sent:** Sunday, August 10, 2025 5:28 PM  
**To:** CHIPSNEPA@chips.gov; Micron@ongov.net  
**Subject:** [EXTERNAL] MICRON Public Comment  
**Attachments:** Landes\_Micron\_Public\_Comment\_Letter.pdf

Please find the attached doc for the public comment. Thank you.

Ann and Scott Landes  
307 Cornwall Drive  
Syracuse NY 13214  
[ricecracker@bellsouth.net](mailto:ricecracker@bellsouth.net)

August 10, 2025

CHIPS Program Office (NEPA)  
National Institute of Standards and Technology  
[CHIPSNEPA@chips.gov](mailto:CHIPSNEPA@chips.gov)

Onondaga County Industrial Development Agency (SEQRA)  
Robert Petrovich, Executive Director  
[Micron@ongov.net](mailto:Micron@ongov.net)

Re: Public Comment on the Draft Environmental Impact Statement for the Micron Semiconductor Manufacturing Project (EISX-006-55-CPO-001)

Dear NEPA and SEQRA Lead Agencies:

We submit these comments as concerned citizens of Syracuse and Onondaga County regarding the Draft Environmental Impact Statement (Draft EIS) for the proposed Micron Semiconductor Manufacturing Project in Clay, New York. After reviewing the Draft EIS, we am deeply troubled by the profound and permanent adverse environmental impacts identified, many of which stand in direct tension with both New York State and federal statutory commitments to environmental protection, climate action, and natural resource stewardship.

*1. Permanent destruction of wetlands and violation of Clean Water Act objectives*

The Draft EIS makes clear that this project will result in the irretrievable loss of approximately 193 acres of federal jurisdictional wetlands and associated stream systems. This level of permanent wetland destruction - even with proposed compensatory mitigation - conflicts with the foundational purposes of the Clean Water Act (33 U.S.C. 1251 et seq.), which aims to "restore and maintain the chemical, physical, and biological integrity of the Nation's waters."

Moreover, the project would fundamentally compromise local ecosystem services, including natural flood control, water filtration, and wildlife habitat, directly undermining the goals set forth in New York's Environmental Conservation Law Article 24 (Freshwater Wetlands Act). It is particularly concerning that the Draft EIS acknowledges these impacts as unavoidable significant adverse effects yet moves forward on a finding of necessity primarily based on economic grounds.

*2. Irreversible habitat loss threatening compliance with federal and state endangered species protections*

The Draft EIS details significant adverse impacts to multiple federally and state-listed threatened and endangered species. Under the Endangered Species Act (16 U.S.C. 1531 et seq.), federal agencies are obligated to ensure that actions they fund, authorize, or carry out

do not jeopardize the continued existence of listed species or destroy or adversely modify critical habitat.

Similarly, New York's Environmental Conservation Law Article 11 (Fish and Wildlife Law) reinforces the imperative to protect listed species and their habitats. The acknowledged permanent loss of significant habitat areas - despite the proposed use of Best Management Practices and some off-site mitigation - appears to fall short of fully preventing such jeopardy.

### *3. Incompatibility with New York's Climate Leadership and Community Protection Act (CLCPA)*

The project is expected to cause a large, unavoidable, and long-term increase in greenhouse gas (GHG) emissions, driven by massive energy consumption (including natural gas) and the inherently energy-intensive nature of semiconductor manufacturing. These emissions growth projections fundamentally conflict with the legally mandated requirements of New York's Climate Leadership and Community Protection Act (CLCPA, Chapter 106 of the Laws of 2019), which requires an 85% reduction in statewide GHG emissions by 2050 from 1990 levels, with interim targets.

Even with proposed solar installations and efficiency measures, the project represents a huge new stationary and indirect GHG source. Proceeding with such a large fossil-dependent project without clear enforceable commitments to align operations with the CLCPA's emissions reduction mandates would undermine the statute's objectives and erode statewide climate progress.

### *4. Irretrievable commitments of natural resources and circumvention of long-term sustainable land use planning*

The Draft EIS explicitly acknowledges that the project would result in irreversible or irretrievable commitments of environmental resources, including permanent conversion of roughly 1,000 acres of existing land to impervious surfaces, consumption of millions of tons of construction materials, and massive long-term use of nonrenewable resources such as natural gas. This effectively forecloses future land uses aligned with sustainable development or regenerative ecological restoration. Such long-term commitments are at odds with New York State Smart Growth Public Infrastructure Policy Act (Environmental Conservation Law 6-0101 et seq.).

### *5. Serious cumulative effects and disproportionate burdens on disadvantaged communities*

The Draft EIS identifies cumulative effects related to induced growth, traffic congestion, increased noise, and additional strain on local infrastructure and housing. Particularly concerning is the intersection with New York State's Environmental Justice Policy (Commissioner Policy 29) and the federal Executive Order 12898 on Environmental Justice, which require fair treatment and meaningful involvement of all communities. The proximity of impacted areas to designated disadvantaged communities (DACs) raises serious equity concerns that have not been fully resolved.

### *6. Unavoidable traffic congestion and air quality degradation*

The project's induced travel demand is projected to cause unavoidable significant adverse impacts to five intersections even after implementing recommended mitigation measures. This will further degrade air quality and increase noise in surrounding communities, compounding health burdens and undermining local quality of life.

In summary, this Draft EIS demonstrates that the proposed Micron project will have profound and permanent environmental consequences, many of which directly contradict the protective purposes of the Clean Water Act, the Endangered Species Act, New York's Freshwater Wetlands Act, and especially the mandates of the Climate Leadership and Community Protection Act. These weaknesses underscore the urgent need for:

- *A full reconsideration of scale, with a credible analysis of reduced-scale alternatives that could materially reduce environmental harms;*
- *Legally enforceable operational requirements that align with CLCPA emissions targets;*
- *Stronger wetland and habitat protection measures that avoid rather than merely compensate for destruction; and*
- *A thorough reassessment of cumulative impacts on environmental justice communities.*

Proceeding as currently planned, without stronger avoidance or enforceable mitigation, risks violating the intent or requirements of the ESA and CLCPA or leading to noncompliance once final agency findings are made. This is why the EIS process exists — to determine if the project must be redesigned, scaled down, or conditioned with strict mitigation to be legally approvable.

We urge your offices to reconsider advancing this project in its current form and to require a substantially more protective alternative that is consistent with both New York State and federal environmental law and policy. Thank you for considering our comments.

Sincerely,  
Ann and Scott Landes

**Archived:** Thursday, August 14, 2025 12:43:34 PM

**From:** [Catherine L Landis](#)

**Sent:** Monday, August 11, 2025 9:37:15 AM

**To:** [chipsnepa](#)

**Subject:** [EXTERNAL] comment on Micron DEIS

**Importance:** Normal

**Sensitivity:** None

**Attachments:**

[Micron DEIS comment CLandis Aug 2025\(1\).pdf](#) 

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Dear Sir or Madam,

Attached please find my comment related to the proposed Micron chips manufacturing DEIS in Clay, NY.

Thank you for the opportunity to comment.

Sincerely,

Catherine

Catherine Landis, MS, PhD  
SUNY College of Environmental Science and Forestry  
1 Forestry Drive, 241 Illick Hall  
Syracuse, NY 13210  
[cllandis@syr.edu](mailto:cllandis@syr.edu)  
315 558-8667

## **Comment on Micron Draft Environmental Impact Statement** Aug 7, 2025

Submitted by Catherine Landis, MS, PhD Ecology

**First**, we need to extend the comment period. 45 days is not sufficient time to evaluate a 20,000 page document full of highly technical information including charts, maps, appendices, etc.. *The comment period needs to be extended to 120 days* to give the public a fair chance to carefully review and submit accurate comment.

**Second**, I will discuss various aspects of the DEIS, beginning with **Wetlands**.

Total delineated Federal wetlands on site: **~409 acres (p3-63)**

### **From the DEIS:**

“Construction of the Proposed Project would result in the permanent loss of approximately 193.38 acres of wetlands being treated as Federal jurisdictional wetlands, or approximately 174.77 acres of wetlands being treated as State jurisdictional, (p. 3-72),

“78.86 acres of wetlands will be lost during the proposed connected actions.” (Page 3-66, section 3.3).

“Construction of the Proposed Project would result in the direct loss of wetlands and their functions and services from site development. In addition, wetland buffers (typically 100 feet from the edge of a wetland in the New York State) would be lost. Increased impervious surfaces could lead to indirect effects from increased stormwater runoff and decreased groundwater recharge.”

“11,600 parking spaces, four bus stops, and seven access roads would be constructed on the campus, including four 500-space surface parking lots. (Table 2.1-3, p. 2-13.)”

### *From the scientific literature:*

If the percent catchment impervious surface cover (ISC) increases to 10-20%, runoff increases twofold; 35-50% ISC increases runoff threefold; and 75-100% ISC increases surface runoff more than fivefold over forested catchments.

Imperviousness has become an accurate predictor of urbanization and urban impacts on streams, **and many thresholds of degradation in streams are associated with an ISC of 10-20%** (Meyer and Paul 2001).

**Comment:** In addition to direct destruction and filling of wetlands, nearby wetlands are sure to be degraded by these indirect effects. Many of the wetlands on site are good quality, including red maple swamps, hemlock-hardwood swamps, floodplain forests, and dogwood and willow shrub swamps. These wetlands contain a high proportion of native species that benefit insect production and that serves as the basis of food webs. Construction and operation of Micron will decimate these food

web connections and result in large-scale mortality of plants and animals, many of whom lack the mobility to escape. Wildlife who can move quickly (such as birds) will be driven off by noise, lights, and increased human traffic. Road salt and other runoff will degrade remaining wetlands into monocultures of Phragmites or invasive cattails, which support minimal animal and plant diversity.

Wetlands are essential to our health and environment. They support more than 1/3 of the country's threatened and endangered species, filter pollutants, and buffer communities from floods. They also store vast amounts of carbon, making them powerful tools in the fight against climate change. In fact, 300 acres of freshwater wetlands store ~305,000 metric tons of carbon dioxide, roughly equal to the yearly emissions of 66,000 cars. Destroying these wetlands will release this CO<sub>2</sub> into the atmosphere and remove future carbon storage, further contributing to climate change. This release of CO<sub>2</sub> is not accounted for in Micron's Draft Environmental Impact Statement (Nahlik & Fennessy, 2016; Watson et al. 2000).

According to the EPA and peer-reviewed literature (e.g., Bridgham et al., 2006), drained freshwater wetlands in temperate regions can release approximately 3-10 metric tons of CH<sub>4</sub> (methane, a potent greenhouse gas) per hectare over the short term following destruction (via oxidation and disturbance). This will contribute to climate change during a time when NYS is supposed to be a leader in reducing greenhouse gases and moving towards Carbon neutrality.

In addition, removing water to lower the water table on the site over the 15 year construction period will impact surrounding streamflow and aquatic ecosystems, leading to elimination of small streams and wetlands from the landscape. Such developments typically bring a cascading sequence of negative landscape impacts that the Plan aims to reduce and mitigate, but fails to do enough.

Further, we can expect these impacts to be multiplied in subsidiary development in the Clay, Cicero, and greater Onondaga and Oswego County areas, with the increase in impervious surfaces associated with thousands of new housing units, office and business spaces. These impacts just continue the trend of decades of wetland draining and filling in the northern part of Onondaga County.

### ***Recommendation***

**The best and preferred strategy to reduce these impacts, is to move the Micron facility to a more appropriate site**, one already degraded by industrial or commercial intrusions.

Barring that, and because of direct, indirect, and cumulative impacts (subsidiary development predicted to occur in the watershed, for example) **we strongly urge regulators to increase the wetland replacement ratio from ~2:1 to ~10-15:1, as was done for the Seneca Meadows wetlands restoration project** (see

<https://res.us/projects/seneca-meadows-wetland-restoration-design-build-mitigation-for-landfill-impacts-to-wetlands/>).

Note Indirect effects on adjacent wetlands and ones connected hydrologically, all the way out to Oneida River floodplain.

## **Wetland Mitigation Work Plan, Appendix G.**

### Section 4.1 Selection and Design Criteria

**“Work areas contain few, if any, existing wetlands,** which allows for focus on reestablishment and are near or adjacent to existing DEC wetlands. Delineated wetlands will be subsumed into the work area and will be either registered as rehabilitation if the area is marginal, which is usually the case, or will otherwise be subtracted from the total acreage built and corresponding credits generated. The agencies decide which option is selected.”

**“2. Sites are in active soybean production.** The sites will stay in active agriculture until construction commences, which helps prevent invasive species and incompatible land uses.”

**Comment:** The wetland mitigation sites are currently in soybean production, for the most part. That’s a major problem since it means there will be a gap of decades before the wetlands (especially the forested ones, 70 acres direct loss) can provide the similar ecological services that the current ones provide (though studies have shown they never reach the same functional capacity as original wetlands - see Moreno-Mateos et al. (2012) - summary below). The sites are also smaller and closer to disturbance (roads, farms, homes).

A meta-analysis by Moreno-Mateos et al. (2012) of 621 restored or created wetlands worldwide found that, even up to 100 years after restoration, biological structure (primarily plant communities) remained about 26% lower and biogeochemical function (driven by soil carbon storage) about 23% lower than in undisturbed reference wetlands. The authors conclude that current restoration practices are often unable to fully recover the original ecosystem functions.

To address these issues, we strongly urge regulators to require Micron to purchase large acreage of existing wetlands (especially forest and shrublands) such as any remaining floodplain forest along the Oneida River. These areas should be protected in perpetuity and held by TWT or the CNY Land Trust.

The mitigation sites are also smaller, isolated fragments, not the integrated whole of the Micron site (with its matrix of forest, grassland, and wetland intertwining– See Fig.F-3, for example).

Wetland mitigation sites should be monitored in perpetuity to ensure they meet restoration targets over the long term.

### **Wetlands and Connected Actions**

Page 3-66, section 3.3:

“A total of 78.86 acres of wetlands have been mapped or delineated within the Connected Action LODs, including the Clay Substation expansion area and the natural gas, water supply, and wastewater improvement LODs, and are being treated as jurisdictional. However, jurisdictional determinations have not yet been issued for these features, with the exception of the Clay Substation (USACE only). For additional information on these wetlands, see Appendix F-3.1.”

#### F-3.1.4

**Connected Actions** The presence and extent of wetlands within each Connected Action LOD were delineated in the field and evaluated in the same manner as those conducted for the proposed Micron Campus, except for wetlands within the proposed water supply improvement LODs, because those improvements are currently scheduled too far in the future for wetland delineations conducted at this time to be valid by the time construction begins.”

“Further, the total amount of non-jurisdictional wetlands present within the LODs cannot be determined at this time because not all of the LODs have been delineated. Except as described below for the proposed Clay Substation expansion area, functional analyses of wetlands within the remaining Connected Action LODs also have not yet been conducted, for various reasons, including because field delineations have not yet been performed, wetlands have yet to be assessed by USACE or NYSDEC, or losses of jurisdictional wetlands within the remaining LODs are anticipated to be negligible.”

#### F-3.2.2

**Connected Actions** The presence and extent of rivers and streams within each Connected Action LOD were delineated in the field and evaluated in the same manner as those conducted for the Proposed Project components, except for rivers and streams within the proposed water supply improvement LOD, because those improvements are currently scheduled too far in the future for delineations conducted at this time to remain valid by the time construction begins.”

**Comment:** 78.86 acres of wetlands and surrounding rivers and streams that will be impacted by future connected actions have not been evaluated yet - these need to be evaluated before any construction begins so that impacts of development can be tracked over time. Also, we need an understanding of total impact (over the entire period of construction) on wetland function, wildlife and plant communities.

**Table 3.3.5 in DEIS.**

**Comment:** Note primary function of wetlands as wildlife and Endangered species habitat. See comment on bats by Dr Vanessa Rojas for limitations of the mitigation plan for bat species.

The Table is missing both the Carbon storage and thermal moderation services of wetlands, two functions very important in a rapidly warming world. These services should be added.

**Wetlands: New York State Law** (new regulations went into effect Jan 2025)

Micron is obligated to adhere to the new NYS Freshwater Wetlands regulations. Micron's current determination of impacted New York State jurisdictional wetlands and the company's obligation to comply with the new state freshwater regulations remains unclear. Starting In 2021, Micron employed Ramboll Americas Engineering Solutions, Inc. (Ramboll) to further identify wetlands types and acreages that should be included under the ACOE and New York state's permitting authority. The results of this research are found in a series of tables, charts and maps in the DEIS that *largely reflect information from old DEC jurisdictional paper maps confirmed on surveys*. (based on determinations issued by NYSDEC under ECL Article 24), approved Jurisdictional Determinations issued by USACE (under the CWA) and what Ramboll describes as non-jurisdictional wetlands 'definitively excluded from Federal and State jurisdiction'.

**Comment:** *The DEIS does not indicate the criteria for how Ramboll decided what wetlands would not receive permitting protection. The DEIS acknowledges the wetlands permitting reforms passed by the NYS Legislature in 2022 and the subsequent regulations for freshwater wetlands that went into effect January 1, 2025. (DEIS appendix F-2.2) But it remains unclear whether Micron is operating under the old rules or the new rules when they decide which wetlands deserve permitting protection.*

Micron and DEC must make clear through the EIS process that this project does not qualify for exemptions from the new freshwater regulations that went into effect January 1, 2025.

**A revised plan for wetlands protection must include:**

- A declaratory statement that the Micron project will comply with the NYS wetlands regulations that went into effect January 1st, 2025.
- *A comprehensive analysis of all wetlands on the project site, regardless of size.* For a publicly subsidized and forward-thinking project like Micron that will be engaged in construction well past 2028, *all wetlands larger than 7.4 acres should be considered state jurisdictional* and come with the commensurate buffers, protections and mitigations associated with their permitting.
- A review of Wetlands smaller than 7.4 acres to determine if they meet the criteria for ‘Local Importance’ and deserving of permitting protections. In consideration of the potential for endangered species on the Micron property, it is conceivable that many of the smaller wetlands would qualify as state jurisdictional wetlands.

## **Wildlife: Reptiles and Amphibians**

### **From the DEIS:**

#### Effects on Reptiles and Amphibians (3-118)

“Mass mortality of reptiles and amphibians, including salamanders, frogs, turtles, and snakes, would be expected to occur during construction as a result of site clearing, grubbing, and grading, as these taxa are not mobile enough to avoid the paths of most site clearing and earthmoving activities. Noise and lighting disturbances also would potentially affect reptiles and amphibians in immediately adjacent areas. In addition, construction could indirectly affect amphibians and aquatic reptiles by altering the water balance and water quality of the Youngs Creek basin. However, as described in Section 3.3 (Water Resources), Micron would implement stormwater BMPs and would be required to undertake SMPs that would be documented in a SWPPP as part of its SPDES CGP. Micron also would implement the ESCP described above. Together, these measures would help minimize adverse effects on reptiles and amphibians. Construction effects on special status species are described under Special Status Species below.”

### **Comment**

--What are the specific stormwater BMP plans, and how would they benefit reptiles and amphibians? Are these creatures’ needs included in the design, or just hoped-for users? If the latter, *we can expect large-scale failure in “minimizing adverse effects”* on reptiles and amphibians, along with mass mortality of these vulnerable animals.

--What is the evidence from past projects, and from the scientific literature, that most species of reptiles and amphibians will use these stormwater areas?

--What are the projected water quality parameters for stormwater runoff, and is the chemistry in the tolerance range of reptiles and amphibians? My professional guess is that turbidity, dissolved salts from deicing agents, heavy metals from brake linings and other chemicals in runoff from impervious surfaces will create conditions intolerable to most aquatic and amphibious life.

--What will Micron do to prevent this anticipated “mass mortality” of reptiles and amphibians? Is there a re-location plan for displaced fauna? **Again, the best relocation plan would be to relocate Micron to a site already damaged** by industrial and commercial impacts, and leave this site to the many species of wildlife that call it home.

--At the very least, Micron should prepare a relocation plan and provide funding for animal road crossings to allow migration and movement of displaced animals.

#### **DEIS 3.4.3.2 Special Status Species: Bats**

Indiana, northern long-eared, tri-colored bats all detected on the Micron site. The first two species are Federally listed as Endangered, while the tri-colored bat is proposed for listing. These bats are in serious trouble due to disease and especially to habitat loss, which the Micron factory perpetuates in a major way given the scale of the project.

*The acoustic survey ... documented Indiana bat and northern long-eared bat activity at levels indicating that **maternity roosts** for one or both of those species may be present on the Micron Campus site.*

#### **Comment:**

- Endangered Bats experiencing freefalls, accelerating towards 100% decline;
- Need evidence from the scientific literature, based on the species in question (and not more generalist bats such as the little brown bat) that proposed mitigation sites will be used;
- Noise, lights, disturbance could drive these bats away; again, evidence that bats may tolerate such intrusions comes from studies on generalist species and not the Endangered ones;
- Need more evidence specific to the Endangered bats to support and revise the current mitigation plan;
- For bats, moving Micron to another site is the best solution.

#### **Birds**

Bird populations are in steep decline across North America (Rosenberg et al. 2019). The recent 'State of the Birds' report (Audubon 2025) suggests that “more than one-third of U.S. bird species are of high or moderate conservation concern.” Even common bird species are experiencing population declines in habitats where they are known to be abundant (Johnston et al. 2025). Leading causes of these declines include habitat loss and habitat fragmentation due to development. Large developments like the Micron project pose a serious threat to all bird populations and species diversity.

The Micron DEIS emphasizes the conservation of grassland birds (which is extremely important); however, **since all species are experiencing population declines, mitigation strategies should be developed and implemented for all bird species.**

#### **From the DEIS:**

##### **3-136:**

“To achieve a net conservation benefit for northern harriers and short-eared owls, NYSDEC would require Micron to achieve a 3:1 ratio of new and improved quality grassland bird habitat to grassland habitat lost due to Proposed Project and Connected Action construction. This mitigation would be carried out within 5-year cycles.”

“These 650 acres would be located across seven properties, with all restored fields to exceed at least 25 contiguous acres each. These properties are located in Oswego, Chenango, Yates, Cortland, Broome, Tompkins, and Tioga Counties at distances of approximately 10-60 miles from the Micron Campus site”

#### **Comment**

--A minimum threshold of 25 contiguous acres is indeed in line with the NYSDEC's *Strategy for Grassland Bird Habitat Management and Conservation 2022-27*; however, it is the absolute minimum requirement and is insufficient to ensure the future success of grassland bird populations. *We think this should be bumped up to a minimum size of 75 acres.*

--While the Grasshopper Sparrow has not been detected on the Micron property, they could possibly occur in the area (Table G-4). Ultimately, Grasshopper Sparrows need more habitat across New York State. Given that they are most successful in at least 75 acres of habitat, they could represent an umbrella species for grassland habitat mitigation. Mitigating habitat suitable for Grasshopper Sparrows would ultimately result in suitable habitat for most other grassland bird species that are less area sensitive.

--Incidentally, the Grasshopper Sparrow is possibly the best grassland bird indicator species primarily due to their sensitivity to habitat change (Elliot and Johnson 2018). No Grasshopper Sparrows present at the Micron site indicate that the existing habitat is perhaps of marginal quality and/or

size. Mitigation could be an opportunity to offer improved grassland habitat for this declining species.

--For Short-eared Owls—which have been observed on the site multiple times, and whose numbers are plummeting in NYS—mitigation needs to include much larger habitat blocks, at least 200 acres (Wiggins et al. 2020).

--Mitigation should be done in such a way so as to reduce habitat fragmentation; e.g., provide a smaller number of large contiguous tracts of habitat rather than several small ones.

--What does it mean that the mitigation will be carried out in 5-year cycles? Explain.

--What will be the management regime for these 7 sites? NYSDEC will maintain long-term management - does this mean in perpetuity?

i.e., these fields will need some type of disturbance (occasional late-fall mowing and/or late-winter fire) to maintain them as early successional open spaces. These fields should \*never\* be mowed between March-October (the earliest mowing events should take place early November)

### **Bird migration:**

A significant research gap is that bird surveys appear to have excluded migration stopover use (i.e., migratory birds stopping and resting on the property to refuel before moving along their migration route). Central New York is along the Atlantic flyway, an important migration path for multiple avian species, from the tiniest warblers to sizable raptors. Whether a short-distance migrant (e.g., sparrows migrating to Florida) or a long-distance migrant (e.g., neotropical migrants), stopover habitat is CRUCIAL for the conservation success of such populations and communities. This should not be overlooked. I think both fall and spring migration surveys should have been done in addition to the breeding and wintering surveys.

The migration of huge numbers of birds occurs at night, and artificial light can disorient and/or attract birds away from their route. During construction of the Micron project, *lights should be off from 11 pm to 6 am during peak spring and fall migration seasons (<https://www.lightsoutcny.org/>)*.

As discussed, the DEIS *needs to provide escape options (mitigation) for all birds, not just grassland species*. What about the great blue herons, who have a rookery on site? Or the little green heron observed in the wetlands, or

the hundreds of neotropical migratory songbirds that use the site? Micron is receiving billions of dollars in public funding, so they should provide financial support for the following practices that could benefit ALL birds, not just grassland ones:

- Acquisition of nearby large, quality habitat blocks (that could go to CNY Land Trust or The Wetlands Trust) to help displaced fauna relocate;
- As discussed, increase wetland replacement ratio to somewhere between 7-10 to 1 (acres replaced to acres lost);
- Addition of conservation practices and design to any subsidiary development, along with retrofits to existing development. For example:
  - Require developers to maintain natural features of the areas they destroy as much as possible.
  - Landscaping of new homes and offices should use native plants and designs that help recreate the habitats lost (conservation housing).
- Development of native plant nurseries and landscaping services;
- Use dark sky lighting (see <https://darksky.org/>) for any new construction, whether industrial, commercial, or residential.
- Fund research and monitoring to assess the success of all of these efforts.

Finally, I emphasize that serious consideration needs to be given for moving Micron to a site more fitting for the kind of large-scale habitat destruction planned to occur there. Wetlands, Endangered bats, Reptiles and Amphibians, Plants, Insects, Birds would all benefit immensely from that wise decision.

Thank you for this opportunity to comment.

Sincerely,

Catherine Landis

wrenlandis@gmail.com

#### **Literature cited**

Bridgham, Scott & Megonigal, Patrick & Keller, Jason & Bliss, Norman & Trettin, Carl. (2006). The Carbon Balance of North American Wetlands. *Wetlands*. 26. 889-916.

10.1672/0277-5212(2006)26[889:TCBONA]2.0.CO;2.

Moreno-Mateos, D., Power, M. E., Comín, F. A., & Yockteng, R. (2012). *Structural and functional loss in restored wetland ecosystems*. **PLoS Biology**, *10*(1), e1001247. doi:10.1371/journal.pbio.1001247

Nahlik, A., Fennessy, M. Carbon storage in US wetlands. *Nat Commun* 7, 13835 (2016). <https://doi.org/10.1038/ncomms13835>

Paul, M. J., & Meyer, J. L. (2001). Streams in the urban landscape. *Annual review of Ecology and Systematics*, *32*(1), 333-365.

Audubon. 2025. U.S. Bird Populations Continue Alarming Decline, New Report Finds. (Available: <https://www.stateofthebirds.org/2025/>)

Elliot LH, Johnson DH. 2018. The grasshopper sparrow as an indicator species in tallgrass prairies. *Journal of Wildlife Management* 82(5):1074-1081.

Johnston A, Rodewald AD, Strimas-Mackey M, Auer T, Hochachka WM, Stillman AN, Davis CL, Ruiz-Gutierrez V, Dokter AM, Miller ET, Robinson O, Ligocki S, Jaromczyk LO, Crowley CL, Wood CL, Fink D. 2025. North American bird declines are greatest where species are most abundant. *Science* 388(6746): 532-537.

NYS DEC. NYSDEC Strategy for Grassland Bird Habitat Management and Conservation 2022-2027. (Available: <https://dec.ny.gov/sites/default/files/2024-04/grasslandbirdsstrategyfinal.pdf>)

Rosenberg et al. 2019. Decline of the North American avifauna. *Science* 366: 120-124.

Samson, F. B. F. L. Knopf, and W. R. Ostlie. 2004. Great Plains ecosystems: past, present, and future. *Wildlife Society Bulletin* 32:6-15.

2

The Oneida River <sup>NY</sup> Barge Canal.  
hosts the

A cut through ~1906? created Horsehoe Island which was the former south bank of the Oneida River. The Peter Scott Swamp <sup>NOTE</sup> features the NW edge of Horsehoe Island thru a long-existent channel. This swamp is not eco-baselined @ present.

The discharges of Micron fabes will touch the Peter Scott, since they are in confluence relatedly near Oak Orchard Wastewater Treatment Plant. Consequences?

As the unelected Oneida River Riverkeeper I will serve the clear and present interests of the adjacent/splitting ecosystem family commons. It is a four-season beauty scape. I envision bio-assays and programming to start at Peter Scott and lower Oneida River (~4 miles) eco-baseline, using limnological research methods.  
A duty of "ECOL Commonwealth 200 of Onondaga".

Thomas E. Law  
140 Mildred Ave., Apt. 3  
Syracuse, NY 13206-3276

1

MONDAY

8-11-25 ARN m1135 @ ONON. COUNTY INDSTR'L DEVL'T Agency,  
2<sup>ND</sup> flr. 335 Montgomery St #3202

"The most important place on earth is the sea!" - Sir David Attenborough, 99

Earth's oceans contain 322,000,000 cubic miles of graded saltwaters.

Locally, ancient Ice Age's "Lake Iroquois" imprinted the flow pattern hydrology ~10,500 years ago/Initiating the Great Lakes Reality, also of which the Oneida-Seneca-Oswego waterworld is tributary. Discharges of the St. Lawrence River mix in its Gulf and merge with the Labrador Current of the N-West Atlantic, thence bathing the eastern seacoast.

A nominal respect for the indigenous ecosystem will require a willingness of Onondaga County and the other systemic regulatory to update the wastewater permits to constrain negative environmental impacts evident by clinically pointed field assays, analysis and formal findings. This is merely facing "the truth" of real chemistry, labwork, bioaccumulation study, etc. and taking a responsible position.

Micron's chemical loads after its pre-treatment will challenge the Oak Orchard processing to "up" its performance to protect our waters which will thereafter enter Lake Ontario merely 20,000 feet from the OCWA intake.

Our commons are upstream and down to our ocean. The current care mindset is well-framed in Future Sea by D. ROWAN-WRIGHT  
Signed, 1<sup>27</sup> pm Aug. 11, 2025 Tom LAW

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**From:** Martha Loeffler <mkloeffl@pm.me>  
**Sent:** Monday, August 11, 2025 8:28 PM  
**To:** chipsnepa@chips.gov  
**Subject:** [EXTERNAL] Questions / request for clarification

- 
1. OCWA will upgrade the water system to supply the micron campus. How much will this cost, and how is this work being funded? Please include how much of the work will be funded by Micron and how much will be funded by the county. How does the county plan to obtain the funds? Is an additional tax levy anticipated, and if so, what is the detailed plan for how this will take place?
  2. OCDWEP is responsible for the upgrades and new infrastructure of the wastewater treatment system. How much will this cost, and how is this work being funded? Please include how much of the work will be funded by Micron and how much will be funded by the county. How does the county plan to obtain the funds? Is an additional tax levy anticipated, and if so, what is the detailed plan for how this will take place?
  3. What other "Connected Actions" will result in costs to Onondaga County? Please include direct and indirect costs. For instance, if the telecommunications needs will be handled by existing infrastructure, how will that infrastructure be replaced, and who is responsible for the cost of it?
  4. The project claims that it will create an excess of 9000 permanent operational jobs. If that claim is not met, will there be an adjustment in the amount of government subsidy? As an example, if AI advances to the point that only 4500 permanent operational jobs are needed, will the subsidies be reduced? Will the pilot be halved?
  5. AI has significant energy needs. Is there a restriction on the energy made available to the micron facility? Is there a priority list in the event of a shortage/brownout?
  6. What will be the impact of PFAS and other "Forever Chemicals" on the fish in the watershed? How will it affect the fishing industry in the area, and what is the expected impact on the people who eat the fish from NY's streams and lakes?
  7. How will Micron and Onondaga County control PFAS and other "Forever Chemicals" that are currently not regulated by the county, state, or federal government?
  8. How will these chemicals be monitored?
  9. Will Micron do internal monitoring of the wastewater? If so, what will be monitored, and at what frequency? How will this information be communicated to the County?
  10. Is there a set of circumstances where the system will be shut down due to the effluent containing dangerously high levels of pollutants?
  11. What is the reporting / oversight method? What will Micron report to the county, and how frequently?
  12. How will emission changes be addressed? As an example, if raw materials change or if product line changes result in different emissions, how will this information be communicated to the county? How will the county respond?
  13. Will the county develop and impose limits on chemicals that are not regulated by the state or federal government?
  14. Will there be any additional monitoring of municipal water supplies to be kept abreast of problems that might occur from emissions?
  15. Will there be any help for individual homeowners who want their wells monitored? For example, will the county look for contamination on a yearly basis or after a high level release?

16. Are there tests for all the chemicals in use and created in situ that might be part of the emissions? Is the county wastewater treatment program equipped to test for them?
17. Have the government or regulators on any level given exemption from liability to Micron for damage related to the emissions? PFAS and related compounds can cause fertility and other health issues. If so, what are the details of this exemption?
18. What is the impact on international waters? If we pollute Lake Ontario, we may have an international liability. What are the laws / rules regarding this?

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**From:** Martha Loeffler <mkloeffl@pm.me>  
**Sent:** Monday, August 11, 2025 8:31 PM  
**To:** chipsnepa@chips.gov  
**Subject:** [EXTERNAL] Re: Questions / request for clarification

I neglected to provide my contact information:

Martha Loeffler  
101 Sycamore St, Apt 13  
Liverpool, NY 13088  
(315) 685-4011

On Monday, August 11th, 2025 at 8:28 PM, Martha Loeffler <mkloeffl@pm.me> wrote:

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**From:** Luscier, Jason <lusciejd@lemoyne.edu>  
**Sent:** Monday, August 11, 2025 8:41 PM  
**To:** CHIPSNEPA@chips.gov  
**Subject:** [EXTERNAL] MICRON Draft EIS 2025 Comments

To whom it may concern:

Please find below detailed comments/suggestions regarding the draft EIS for the MICRON project. Please let me know if you would prefer this text via a Google Doc or an MS Word file.

**Maryanne Adams, Conservation Chair, Onondaga Audubon**

**Jason D. Luscier, Ph.D., Certified Wildlife Biologist®, Professor of Biological & Environmental Sciences, Le Moyne College**

**Catherine Landis, Ph.D., SUNY ESF**

## **Birds:**

Bird populations are in steep decline across North America (Rosenberg et al. 2019). The recent 'State of the Birds' report (Audubon 2025) suggests that "more than one-third of U.S. bird species are of high or moderate conservation concern." Even common bird species are experiencing population declines in habitats where they are known to be abundant (Johnston et al. 2025). Leading causes of these declines include habitat loss and habitat fragmentation due to development. Large developments like the Micron project pose a serious threat to all bird populations and species diversity. This EIS emphasizes the conservation of grassland birds (which is extremely important); however, since all species are experiencing population declines, mitigation strategies should be developed and implemented for all bird species. This could include habitat creation and restoration near the Micron property, and providing financial support to local organizations such as the CNY Land Trust, Onondaga Audubon, and other environmental groups, including those that promote the use of native plants..

Open habitats are disappearing across New York State, so grassland songbirds are experiencing population- and community-level declines. This is happening all over North America. New York State is incentivizing solar farm development which is contributing to increased grassland habitat loss. According to the NYSDEC **Strategy for Grassland Bird Habitat Management and Conservation 2022-27**: "Current grassland habitat on State land is limited and insufficient to meet

the needs of grassland birds.” These early successional habitats require regular natural or anthropogenic disturbances (e.g., fire, wind, haying, grazing). Two species of conservation concern in New York State include the Northern Harrier and the Short-eared Owl. These species require large contiguous tracts of grassland habitat for both breeding and overwintering. Many grassland songbird species are also area-sensitive, so it is important that mitigation measures mindfully incorporate minimum area thresholds that are suitable for conserving as many species as possible.

Below are comments on specific components of the DEIS:

### **3-136:**

“To achieve a net conservation benefit for northern harriers and short-eared owls, NYSDEC would require Micron to achieve a 3:1 ratio of new and improved quality grassland bird habitat to grassland habitat lost due to Proposed Project and Connected Action construction. This mitigation would be carried out within 5-year cycles.”

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- A minimum threshold of 25 contiguous acres is indeed in line with the NYSDEC’s **Strategy for Grassland Bird Habitat Management and Conservation 2022-27**, however, it is the absolute minimum requirement and is insufficient to ensure the future success of grassland bird populations. We think this should be bumped up to a minimum size of 75 acres.
  - While the Grasshopper Sparrow has not been detected on the Micron property, they could possibly occur in the area (Table G-4). Ultimately, Grasshopper Sparrows need more habitat across New York State. Given that they are most successful in at least 75 acres of habitat, they could represent an umbrella species for grassland habitat mitigation. Mitigating habitat suitable for Grasshopper Sparrows would ultimately result in suitable habitat for most other grassland bird species that are less area sensitive.
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- Mitigation should be done in such a way so as to reduce habitat fragmentation; e.g., provide a smaller number of large contiguous tracts of habitat rather than several small ones.
- What does it mean that the mitigation will be carried out in 5-year cycles? Explain.
- What will be the management regime for these 7 sites? NYSDEC will maintain long-term management - does this mean in perpetuity?
  - i.e., these fields will need some type of disturbance (occasional late-fall mowing and/or late-winter fire) to maintain them as early successional open spaces. These fields should *\*never\** be mowed between March-October (the earliest mowing events should take place early November)

### **Bird migration:**

A significant research gap is that bird surveys appear to have excluded migration stopover use (i.e., migratory birds stopping and resting on the property to refuel before moving along their migration route). Central New York is along the Atlantic flyway, an important migration path for multiple avian

species, from the tiniest warblers to sizable raptors. Whether a short-distance migrant (e.g., sparrows migrating to Florida) or a long-distance migrant (e.g., neotropical migrants), stopover habitat is CRUCIAL for the conservation success of such populations and communities. This should not be overlooked. I think both fall and spring migration surveys should have been done in addition to the breeding and wintering surveys.

The migration of huge numbers of birds occurs at night, and artificial light can disorient and/or attract birds away from their route. During construction of the Micron project, lights should be off from 11 pm to 6 am during peak spring and fall migration seasons (<https://www.lightsoutcny.org/>).

**G-45:**

We're confused by this statement:

"55 bird species have the potential to occur at the Micron Campus site and 40 species have the potential to occur at the Rail Spur Site, and 26 of those species were observed during the site investigations and surveys, indicating that those species are year-round residents at those sites."

This sentence is not clear to me. Does this mean that the same 26 species were detected during the breeding season \*and\* during the winter surveys? This is not clear (and seems unlikely).

Northern Harriers and Short-eared Owls are both considered "species of greatest conservation need" in New York State. The following observations support the premise that the area to be developed for Micron is breeding habitat for the Northern Harrier:

**Appendix G-5 Executive Summary on page i:** "However, a report of a northern harrier egg in the Project Study Area in late April, prior to the start of the survey, indicates some usage of the site as breeding habitat by this species."

**Appendix G-5, page 9:** "Ramboll staff also observed a harrier egg on the ground, which was not in a nest and appeared to be unviable and abandoned."

There is evidence that Short-eared Owls have used the Micron Campus site as a winter roost:

**G-3.5.5, page G-67:** "As stated above, a short-eared owl was documented at the Micron Campus site by NYSDEC and members of the public on eBird during the winter of 2022-2023."

- This suggests that only one bird was documented during that time. This is not true. At least three (3) individuals were detected there (personal observation from 7 February 2023 at 17:40). More than one individual foraging together - this indicates a potential communal roost. No evidence (of which I'm aware) that these birds returned for the 23-24 or 24-25 winters (which the authors of the EIS indicate).
- "The primary threat to SEOW is loss or fragmentation of habitat due to human development, reforestation, wetland loss, and changes in farming practices (Post 2004, Morgan and Burger 2008, Corwin 2012, Wiggins et al. 2020). SEOW require large, intact, contiguous grassland areas for both breeding and wintering populations, which makes them particularly vulnerable since grasslands are one of the most endangered habitats in North America – with a current loss of 97% of the United States's native grasslands (Wiggins et al. 2020, Samson et al. 2004, North American Bird Conservation Initiative 2011). Successful habitat management and restoration projects must aim to conserve or restore large blocks of

grassland habitat (>247 acres) that provide a suitable prey population of small mammals (Wiggins et al. 2020)” (as cited in Audubon 2023)

According to the Grassland Bird Trust, once, wintering flocks of 40 – 50 Short-eared Owls could easily be observed in the large grassland areas that occurred across the state. Now, fewer than 100 birds remain in the wild, and Short-eared Owls are listed as endangered in New York State. Mitigation for any habitat with potential for use as a wintering site by Short-eared Owls should be implemented. Because Northern Harriers and Short-eared Owls have similar habitat requirements and are often observed in the same area, providing and managing large blocks of grasslands for mitigation will benefit both species.

Due to the extreme amount of habitat loss that will result from the development of the Micron site and from the consequential loss of open space as land is developed to meet the needs of the Micron project, the amount of land to be purchased for mitigation should exceed a 3:1 ratio in order to provide a net conservation benefit. In addition to the 1400 acres to be developed at the site, more than a hundred acres of empty land along Route 31 have been purchased for supply chain industries for Micron and additional parcels of undeveloped land near the Micron site (about 130 acres) just came up for sale. Even more land will be used for road widening, additional power lines, solar and wind projects to supply energy to Micron, and water pipe pathways to bring millions of gallons of clean water in and to take treated wastewater away. Additional land will be taken for housing developments and the related services needed for the growing population - shopping centers, entertainment, schools, and medical services. Millions of dollars are going to be invested in new hotels, lakeside apartments, and townhouses. In a nutshell, every inch that can be developed probably will be.

In light of the cumulative habitat loss that will occur over the next sixteen years, it is quite reasonable to request a habitat replacement ratio of 5:1 to help compensate for this. Just as there is an expectation that thousands of jobs will be created due to Micron, habitat loss should also be recognized as a direct result of the construction of the Micron project in Clay and mitigation must adequately compensate for this loss.

### **Literature cited:**

Audubon 2023. National Audubon Society Comments on WNY STAMP Incidental Take Permit – Application ID: 8-1820-00032/00003. Letter submitted to NYSDEC, dated March 31, 2023.

Audubon. 2025. U.S. Bird Populations Continue Alarming Decline, New Report Finds. (Available: <https://www.stateofthebirds.org/2025/>)

Corwin, Kimberley. 2012. Species Status Assessment: Short-eared Owl. New York State Department of Environmental Conservation. Available from: [https://www.dec.ny.gov/docs/wildlife\\_pdf/sgcnshortearowl.pdf](https://www.dec.ny.gov/docs/wildlife_pdf/sgcnshortearowl.pdf)

Elliot LH, Johnson DH. 2018. The grasshopper sparrow as an indicator species in tallgrass prairies. *Journal of Wildlife Management* 82(5):1074-1081.

Johnston A, Rodewald AD, Strimas-Mackey M, Auer T, Hochachka WM, Stillman AN, Davis CL, Ruiz-Gutierrez V, Dokter AM, Miller ET, Robinson O, Ligocki S, Jaromczyk LO, Crowley CL, Wood CL, Fink D. 2025. North American bird declines are greatest where species are most abundant. *Science* 388(6746): 532-537.

New York’s Imperiled Grassland Birds (Available:

[\(https://www.grasslandbirdtrust.org/conservation/grassland-birds-at-risk/\)](https://www.grasslandbirdtrust.org/conservation/grassland-birds-at-risk/)

NYS DEC. NYSDEC Strategy for Grassland Bird Habitat Management and Conservation 2022-2027. (Available: <https://dec.ny.gov/sites/default/files/2024-04/grasslandbirdsstrategyfinal.pdf>)

Rosenberg et al. 2019. Decline of the North American avifauna. *Science* 366: 120-124.

Morgan, Michael and M. Burger. 2008. A plan for conserving grassland birds in New York: final report for the Department of Environmental Conservation under contract #C005137. Audubon New York. Ithaca, NY

North American Bird Conservation Initiative, U.S. Committee. 2011. The State of the Birds 2011 Report on Public Lands and Waters. U.S. Department of Interior, Washington, D.C., USA.

Post, Tim. 2004. State wildlife comprehensive plan- draft species group report for grassland birds. In: New York State Department of Environmental Conservation. Comprehensive wildlife conservation strategy species reports for: Birds. 114 pgs. September 24, 2004.

Samson, F. B. F. L. Knopf, and W. R. Ostlie. 2004. Great Plains ecosystems: past, present, and future. *Wildlife Society Bulletin* 32:6-15.

Wiggins, D. A., D. W. Holt, and S. M. Leasure (2020). Short-eared Owl (*Asio flammeus*), version 1.0. In *Birds of the World* (S. M. Billerman, Editor). Cornell Lab of Ornithology, Ithaca, NY, USA.

Respectfully submitted by:

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*Pronouns: he, him, his*

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---

**From:** Patrick Lynch <plynch@cnylandtrust.org>  
**Sent:** Monday, August 11, 2025 5:24 PM  
**To:** CHIPSNEPA@chips.gov  
**Subject:** [EXTERNAL] Comments on Micron DEIS from CNYLT  
**Attachments:** CNYLT Comments on Micron DEIS 081125.pdf

---

Greetings,

Please see attached comments on behalf of the Central New York Land Trust, for inclusion in the public record.

Thank you,  
Patrick

**Patrick J. Lynch**  
Executive Director  
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August 11, 2025

Onondaga County Industrial Development Agency  
ATTN: Micron Project  
335 Montgomery Street, Floor 2M  
Syracuse, New York 13202

## **Central New York Land Trust's Comments Regarding Proposed Micron Project**

The Central New York Land Trust (CNYLT) is a 501(c)3 nonprofit organization supported by members around the region since 1973. Our Land Trust currently owns and operates 56 nature preserves across Central New York. We serve communities in Onondaga County, Oswego County, and several adjacent counties. Our work is funded by more than 630 active supporters, most of them living or working in our service area. Our service area includes the proposed Micron Project, as well as many—if not all—of the communities that will be impacted.

CNYLT's nature preserves provide critical habitat for a variety of species, including rare wetland plants, endangered species, and other species that have experienced steep declines over the last few centuries. While progress has been made to protect the remaining remnant forests that exist, and protect or restore wetlands that were once drained for farming, development proposals like the Micron Project threaten to undermine that progress without appropriate mitigation measures.

As the region continues to change, any conversation about a major development proposal should be done in parallel with the longer conversation about what it means to be part of Central New York. Without adequate conservation measures and increased commitments to work with partner conservation groups, the Micron Project may cost the region more than it provides.

### **Land Conservation in Central New York**

Conservation organizations like the Central New York Land Trust play an important role in our communities. Working together, we safeguard vital habitats, enhance water quality, and restore ecosystems to ensure future generations can enjoy the wonder of our local wildlife. Three recent restoration properties CNYLT owns and manages include:

- CNYLT's Black Creek Preserve in Onondaga County, which protects more than 280 acres of habitat that were restored by our partners at Ducks Unlimited and Wetlands



America Trust through several restoration measures, including tree and shrub planting, hydrology restoration, and invasive species control;

- CNYLT’s Gardenier Road Preserve in Oswego County, which protects 71 acres that were restored from former crop field into a thriving wetland, again thanks to Ducks Unlimited and partners at the Wetlands America Trust; and
- CNYLT’s O’Neill Family Farm Field Preserve in Onondaga County, which preserves 144 acres of farmland to protect the primary drinking water source for the City of Syracuse. The preserve is home to our largest native tree restoration date undertaken to date, with 1,500 native trees planted in 2025 and 3,500 native trees scheduled in 2026. Support for this project comes from state agencies, nonprofit partners like The Nature Conservancy and Skaneateles Chamber of Commerce, and more than 80 volunteers.

Creating and maintaining a nature preserve is a community-wide effort. Each preserve comes with its own tailored management plan, which we draft with input from experts, neighbors, and other stakeholders. Oftentimes, we also consult with partner organizations that share our mission and lend additional expertise. As a nationally-accredited Land Trust, we also comply with requirements to ensure our preserves can be protected in perpetuity. Those requirements include annual monitoring activities, maintaining a legal fund to address encroachment issues, financial management and auditing rules, and following best practices for ecosystem management.

Some preserves are designed to be kept forever wild. Others include public trail access for walking dogs, watching birds, and other opportunities for Central New Yorkers to get out and enjoy nature. Our non-public preserves also provide indirect services to residents, both by protecting habitats that provide critical ecosystem services like flood management and by creating spaces for researchers to study the ways our region has changed over the centuries. Altogether, the more than 4,400 acres we have protected since 1973 provide services to more than a half million people in Central New York.

### **Concerns about the Micron Project**

Many of our members are concerned about the impact the Micron Project will have on wetlands and endangered species. Additional concerns include the amount of landfill that will be transported to the site to fill in the wetlands, and the water-intensive use of the project. Our comments today focus on the loss of wetlands and streambanks, and the ecosystem services those wetlands provide. We also offer recommendations for mitigating the most severe impacts. When considering additional mitigation actions, the Central New York Land Trust and our partners are available to assist in managing, maintaining and preserving critical wetland areas.

The DEIS acknowledges several losses for Central New York as the Micron Project is built. The project will result in destroying 194 acres of federal jurisdictional “high quality wetlands” that “would eliminate their principal and suitable wetland functions and services,” as well as the



“permanent loss of a minimum of 315 acres of wetland buffer areas” (DEIS 3-74) and 6,283 linear feet of delineated stream channels (DEIS 3-118). These wetlands and riparian habitats are home to thousands of birds, trees, shrubs, wildflowers, frogs, turtles, butterflies, moths and mammals. The DEIS concludes the impact on these species includes “significant adverse effects on Federal and State listed threatened and endangered species, including the Indiana bat, northern long-eared bat, tricolored bat, northern harrier, and short-eared owl” (DEIS 0-7). Destroying these wetlands will also impact the ecosystem services they provide to our communities, including increased stormwater runoff, decreased groundwater recharge, water quality degradation, and other impacts (DEIS 3-74, Table 3.3-8).

### **Recommendations: Commit to Communities through Conservation**

To ensure Micron’s net benefit to Central New York is positive, and not negative, Micron should adopt several measures to offset the displacement it will cause, and to account for the failure to accurately determine the overall impact. Some of these recommendations come directly from the actions Micron is committing to implement at their project sites, such as its commitment to “incorporate landscaped areas using native species where feasible around the new site buildings, parking lots, pollinator gardens, and stormwater management areas” at the Childcare Site (DEIS 3-120). The Central New York Land Trust’s recommendations include:

1. Increase the required wetland replacement ratio based on best practices for mitigation banking. The current 2:1 ratio is insufficient, given the issues mentioned above about site fidelity and associated risks. In fact, when factoring in the estimated minimum permanent loss of wetland buffer areas, the ratio drops to less than 1:1 (minimum 509 acres lost, to 406 acres mitigated). A higher ratio (in the range of 10:1 or more) would more adequately incorporate risks and estimated loss of buffer areas, and build in assurances that Central New York will benefit more than it will lose.

There are examples of how to do it right, including one right up the river. In 2007, the Seneca Meadows landfill mitigated 70 acres of forested wetlands by protecting 1,100 acres of adjacent wetlands, protecting more than 15 acres for each acre filled in a watershed that eventually drains into the Oneida River through the Erie Canal System. Real commitments to Central New York that go beyond the minimum regulatory requirements could bring a net benefit for wetland conservation, rather than a net loss.

2. Support and fund local municipalities and nonprofit organizations to build training programs and offer incentives for residents, developers and local businesses to engage in the following mitigation measures:
  - a. Training programs and incentives for residents to establish pollinator habitats on their yards and neighborhoods to plant new conservation housing;



- b. Training programs, incentives, and revised local regulations to require natural features be maintained for proposed housing development sites associated with the Micron Project;
  - c. Zoning regulations and incentives for housing projects to utilize landscaping techniques that incorporate “conservation housing” (native plants that provide habitat for pollinators, bats, and other displaced species);
  - d. Incentives for plant nurseries and landscaping services that offer native plant options to assist residents and developers in creating conservation housing, building pollinator gardens, and adopting other net-benefit measures;
3. Establish a fund for future acquisitions of conservation lands as the actual impacts of the Micron Project are better understood, instead of relying on the estimated impacts in the DEIS. Large development projects like this one come with a large number of uncertainties. If the funds were not ultimately used for future acquisitions, the funds could still support communities in the region by being reallocated to support efforts by local municipalities and nonprofits to incentivize the collective actions described above; and
  4. Increase funding for research and monitoring to assess the success of these additional efforts, in partnership with regional public universities like SUNY-ESF and SUNY-Oswego and nonprofit conservation organizations.

At the end of the day, the measure of Micron’s success will be whether its impact is a net positive for the region, both in terms of conservation goals and economic development. One way to do that is to partner with municipal and conservation partners to think creatively about ways to work together beyond the direct impact site. We can accomplish quite a lot as a region, but only if we agree to do more than the bare minimum.

Sincerely,

Patrick J. Lynch, JD, MPA  
Executive Director  
Central New York Land Trust  
[plynch@cnylandtrust.org](mailto:plynch@cnylandtrust.org) | 315-575-8839

---

**From:** Marzocchi, Marco <mmarzocchi@Widewaters.com>  
**Sent:** Monday, August 11, 2025 5:11 PM  
**To:** 'CHIPSNEPA@chips.gov'  
**Cc:** Robert M. Petrovich (robertpetrovich@ongov.net)  
**Subject:** [EXTERNAL] Micron

I am writing to express my enthusiastic support for the Draft Environmental Impact Statement (DEIS) for the proposed Micron New York Semiconductor Manufacturing Project in the Town of Clay, New York.

While this project will bring changes to our community in more ways than one, the overall impacts to the region will be overwhelmingly positive. After decades of stagnation, population decline, and job losses, the opportunities for our future generations to be created by Micron's investment cannot be overstated.

Unfortunately, critics of this project have overstated the ecological impacts. Indeed, those impacts have been exaggerated. Those same critics have also understated Micron's commitments to mitigation and conservation.

From my reading of the DEIS, the document reflects a thorough and compliant approach to evaluating the environmental impacts of this development. What more can we ask?

I am particularly encouraged by the proposed mitigation efforts and environmental enhancements outlined in the DEIS. For example:

- **Restoration and enhancement of local waterways**, including Buxton Creek, Fish Creek, and the Caughdenoy and Oneida River systems,

through compensatory mitigation plans that will improve aquatic habitats and water quality;

- **Implementation of green infrastructure** for stormwater management, such as bioswales and permeable surfaces, to reduce runoff and protect local water bodies;
- **Preservation and restoration of wetlands and grassland habitats**, which will support biodiversity and protect native species, including those identified in the Grassland Breeding Bird Survey; to this point, I read with interest Catherine Landis's critique which recently ran in Syracuse.com; Ms. Landis' letter focuses on, among other matters, the loss of wetlands and insufficient compensation for such losses; yes, there will be impacts to approximately 200 acres of wetlands and 6400 linear feet of stream, but what she conveniently neglects to mention is that Micron will provide for compensation to the tune of nearly 500 acres of wetland restoration and more than 14,000 linear feet of stream mitigation; she also conveniently leaves out of her opinion letter the fact that the existing wetland community is already fragmented, while complaining about the fragmented nature of the compensation areas; she also fails to mention that the wetland compensation areas will be permanently protected and managed, benefits not currently enjoyed by the Micron site; lastly, Ms. Landis makes it sound as if these wetland are unique; by any definition, they are not special; in fact, they are typical for the area;
- **Invasive species management and native landscaping**, which will enhance ecological resilience and promote long-term environmental health;
- **Energy-efficient building design and sustainable construction practices**, including recycling of construction materials and reduction of greenhouse gas emissions.

These efforts go beyond mitigation; they represent a proactive investment in the environmental stewardship and enhancement the likes of which I have never witnessed in the area. Micron's approach demonstrates a clear

commitment to sustainability, ecological restoration, and responsible growth. If I have any complaints, it's that Micron has set the mitigation bar too high for other development projects in the future.

I fully support the DEIS and the strategies it proposes, and I urge the OCIDA and CHIPS Program Office to move forward with the project's approval.

Thank you for your leadership and for the opportunity to provide input on this critical initiative.

Sincerely,

**Marco Marzocchi**  
Director of Development



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**From:** McGrath, Erin <Erin.McGrath@audubon.org>  
**Sent:** Monday, August 11, 2025 5:26 PM  
**To:** chipsnepa  
**Subject:** [EXTERNAL] National Audubon Society Comments on Micron Project  
**Attachments:** Audubon Comments on Micron Project DEIS 08112025.pdf

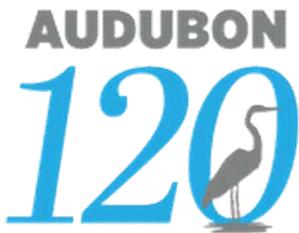
Good afternoon,

Attached, please find the National Audubon Society's comments on the Draft Environmental Impact Statement for the Micron Project. If you need any additional information or have any questions, please don't hesitate to contact us.

Best,  
Erin McGrath

—  
**Erin McGrath**  
Policy Director  
518.860.4296

**National Audubon Society**  
1 Steuben St  
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[ny.audubon.org](http://ny.audubon.org)



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VIA ELECTRONIC DELIVERY

August 11, 2025

Onondaga County Industrial Development Agency (OCIDA)  
ATTN: Micron Project  
335 Montgomery Street, Floor 2M  
Syracuse, New York 13202

**RE: National Audubon Society Comments on Micron Draft Environmental Impact Statement**

To Whom It May Concern,

On behalf of the National Audubon Society's New York State office, with a membership of 90,000 New Yorkers, we thank you for the opportunity to comment on the Draft Environmental Impact Statement put forward by the Onondaga County Industrial Development Agency and CHIPS America. We respectfully submit the following comments concerning the potential impacts to the project site and the birds that rely on it for your consideration.

**Impacts to Short-eared Owl and Northern Harrier in New York State**

The Short-eared Owl (SEOW) and Northern Harrier (NOHA) have consistently struggled in New York State, and if they are present in a particular area, it will be difficult to achieve successful mitigation that provides a net conservation benefit in other locations. Compensatory mitigation is intended to compensate for the loss of known, occupied habitat by protecting or enhancing potential habitat elsewhere to replace or offset the specific habitat and species impacted. However, there is no guarantee that the proposed mitigation will be successful and replace the lost habitat and impacted species. Because of this, compensatory mitigation ratios should be at least 1:1, absent the use of successional life cycles, to address the uncertainty of success and to achieve a net conservation benefit. For example, if 100 acres of occupied habitat are taken, 100 acres of habitat should be either conserved or restored and maintained for the life of the project.

The DEIS states that the Micron Project is expected to result in “significant adverse impacts” to NOHA and SEOW due to loss of breeding and winter habitat as well as displacement from the project site. In order to mitigate these impacts, Micron has proposed to purchase 650 acres of high-quality habitat across seven properties, which will be given permanent protection and also be managed to provide habitat for grassland birds for 15 years. The DEIS states that the restored fields on these properties will exceed 25 contiguous acres each, and that a final grassland protection plan will be developed in coordination with the NYS Department of Environmental Conservation (“NYS DEC”) in order to ensure the achievement of a net conservation benefit for the impacted species.

Without additional details on the actual locations of the mitigation parcels and the specific acreages of each restored field, it is not possible for us to determine whether this mitigation will be adequate at this time. We look forward to reviewing the draft Part 182 Incidental Take Permit and providing more detailed comments on the proposed Net Conservation Benefit Plan through additional public comments to the NYS DEC. However, we believe that the DEIS should note the following habitat needs for SEOW and NOHA:

- Both species need large acreages of contiguous habitat for wintering and breeding that are at least 100 acres in size. If 650 acres of mitigation is to be spread across seven locations, the restored fields must be adjacent to additional potential habitat in order to provide a sufficient amount of habitat to support each species and their essential behaviors.
- There should be additional potential habitat in the vicinity of the proposed mitigation parcel. This contributes to the likelihood that the mitigation parcel will be occupied by the targeted species (Winter et al. 2006) and affects the productivity of the targeted species (Gates and Gysel 1978).
- SEOW and NOHA need large, unfragmented, open complexes comprised mostly of grasslands and wetlands that lack visual and structural disturbances, which may deter area-sensitive grasslands birds from selecting certain habitats (Winter et al. 2006; Gates and Gysel 1978, Ribic et al. 2009). NOHA, in particular, is quite sensitive to human disturbance and will leave wintering or breeding sites if there is too much human activity in the vicinity of its habitat (Hager 2009, Serrentino 1992, Bildsteon 1987a). Quality habitat for area-sensitive species also contains abundant interior space available, i.e. not long and linear in shape but round or square to maximize interior habitat availability and distance to the grassland edge.

**Tree Clearing and Construction Windows.** The DEIS states that tree clearing would not occur between April and July to accommodate the primary breeding season and protect woodland birds. We would suggest extending that period until August to accommodate late breeders, such as the Cedar Waxwing and American Goldfinch, or species that may produce multiple broods, which includes several grassland bird species. Additionally, the DEIS states that construction in open fields would be limited to late summer and early fall to avoid the breeding season and complete construction

prior to the wintering period. We would recommend limiting construction in open fields to the period between August 15 and November 1 for the same reasons noted above.

**Use of Impervious Surfaces.** According to Section 3.3 of the DEIS, the campus would create approximately 645 acres of impervious surface coverage, with the undeveloped areas covered mainly by manicured lawns, landscaped areas, and stormwater management areas. We appreciate that the applicant has mentioned using green infrastructure such as bioswales with native plantings, rain gardens, and permeable pavement, and advise that they be prioritized when designing the site's stormwater management plan and that the use of manicured lawns be minimized as much as possible.

**Native Plants.** The applicant has committed to using native plant species where practicable to “provide habitat value, support pollinators, and reduce need for irrigation and chemical treatments.” Native plantings should be prioritized in landscape planning wherever possible to help offset the habitat loss generated by the construction of the Micron Project.

\*\*\*

Thank you again for considering these comments. If you have any questions regarding these comments, please contact Erin McGrath, Policy Director, at [erin.mcgrath@audubon.org](mailto:erin.mcgrath@audubon.org).

Sincerely,



**Erin McGrath**  
Policy Director  
National Audubon Society

## Appendix 1 - Sources Cited

- Bildstein, K. L. (1987a). Behavioral ecology of Red-tailed Hawks (*Buteo jamaicensis*), Rough-legged Hawks (*Buteo lagopus*), Northern Harriers (*Circus cyaneus*), and American Kestrels (*Falco sparverius*) in south central Ohio. Ohio Biol. Surv. Biol. Notes 18
- Gates J. E., and Gysel L. W. 1978. Avian nest dispersion and fledging success in field-forest ecotones. Ecology. 59:871–883.
- Hager, S. B. 2009. Human-related threats to urban raptors. Journal of Raptor Research 43(3):210- 226.
- Christine A. Ribic, Rolf R. Koford, James R. Herkert, Douglas H. Johnson, Neal D. Niemuth, David E. Naugle, Kristel K. Bakker, David W. Sample, Rosalind B. Renfrew "Area Sensitivity in North American Grassland Birds: Patterns and Processes," The Auk, 126(2), 233-244, (1 April 2009).
- Serrentino, P. (1992). "Northern harrier, *Circus cyaneus*." In Migratory nongame birds of management concern in the northeast., edited by K. J. Schneider and D. M. Pence, 89-117. Newton Corner, MA: U.S. Fish Wildl. Serv
- Winter, M., D. H. Johnson, J. A. Shaffer, T. M. Donovan, and W. D. Svedarsky. 2006. Patch Size and Landscape Effects on Density and Nesting Success of Grassland Birds. Journal of Wildlife Management: Vol. 70, No. 1 pp. 158–172.

---

**From:** Michael Mikulewicz <mmikulew@esf.edu>  
**Sent:** Monday, August 11, 2025 1:01 PM  
**To:** chipsnepa@chips.gov  
**Subject:** [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001  
**Attachments:** img-2fe43498-b41d-4c1f-8fd2-6db1df10b175; Micron.pdf

---

Hello,

Please find attached my comments for Micron's proposed development in Syracuse, NY.

Best,

--

Michael Mikulewicz, PhD  
*Assistant Professor*

Department of Environmental Studies  
SUNY College of Environmental Science & Forestry (ESF)  
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**New article:** [The Promise of Resistance](#) in *WIRES Climate Change* (Open Access)

**New article:** [Resisting Post-Political Adaptation](#) in *Antipode*

**New book:** [Climate Justice in the Majority World](#) by *Routledge*



August 11, 2025

Dear CHIPS Program Office:

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. The comment period must be extended to October 25, 2025, at a minimum, especially given there has been no public response to a petition signed by over 1,500 residents of the region asking the same.

Despite the short turnaround to review the lengthy DEIS, I am submitting my comments based on my expertise as an environmental social scientist, Assistant Professor at the SUNY College of Environmental Science & Forestry and resident of Syracuse. I will focus on just a couple of the key social issues that are insufficiently addressed in the DEIS. While I also have significant environmental concerns, I trust those are being addressed by other concerned residents.

Micron says in the DEIS that there are no environmental justice impacts from this project, nor does Micron provide a methodology for their study of environmental justice impacts that allowed them to arrive at this conclusion. Micron looks at the communities only within 5 miles of its main campus and a 1/2 mile from their rail spur, childcare center, and wastewater treatment plant expansion. They do not provide consistent analysis of both "Disadvantaged Communities" and low-income communities. Micron does not consider cumulative environmental impacts on communities. Micron does not consider the

environmental justice impact of connected actions which are numerous involving rail spur, highway interchanges, new water, electric and fossil fuel lines and transportation related to installation and operation of these connected actions.

In addition, Micron gives insufficient attention to the process of soliciting community feedback during the proposal. Of note, Micron only lists two meetings with a total of 45 people. Micron mentions a consulting Community Engagement Committee, but this consultation only related to Micron's financial commitments not environmental or community impacts.

Finally, the environmental justice impacts of the growth inducing impacts of Micron are only evaluated qualitatively and generally. They do not look at the income and EJ status of the communities receiving their wastewater and stormwater downstream, or their hazardous waste. Micron claims its contribution to climate change is a global and regional issue, and therefore not a local environmental justice issue. This is not acceptable – climate impacts are inherently local and must be duly considered in the final statement. Floods, the urban heat island effect and the associated heat waves, storms, **and** the effects these and other climate impacts will have on surrounding communities – both human and non-human – must be analyzed thoroughly and made public.

In order for the Micron project to move forward, the following must be required of Micron:

Micron should provide more details on how their Environmental Justice outreach process was determined and justification for this process and provide more detail and justification for how they choose the study area for their Environmental Justice review.

Micron must make the DEP 24-1 form submitted to the NYSDEC public.

Micron should be required to increase the area they evaluate for Environmental Justice impacts to include downstream communities, the Town of Clay, Liverpool, and parts of Syracuse, as well as communities within 5 (not .5) miles of their rail spur, childcare center, and water treatment plant expansion, and around planned roadway changes.

Overall, Micron should expand their study area given that this is the largest private development project in NYS history.

Micron must be required to provide more evidence that they engaged in robust public outreach, either during or beyond their two listed meetings with a total of 45 people.

Micron should be required to engage in enhanced public participation because their project will have environmental justice impacts. This public participation should consider that many residents in EJ communities may face barriers to participation, including digital access, transportation, and language. Micron could engage in proactive outreach, including door-to-door engagement, community liaisons, and partnerships with trusted local organizations.

Micron should quantitatively and specifically evaluate the long-term impacts of growth inducing effects on environmental justice.

Micron must evaluate how their contributions to global warming will have adverse local effects and evaluate how these effects impact environmental justice.

Micron should be required report on where waste from the project site will be transported to and evaluate the environmental justice impacts on these locations.

Lastly, for the DEIS to be approved, Micron must be required to develop a community-expert advisory and oversight committee that can assist with ongoing and meaningful community engagement.

Sincerely,

Michael Mikulewicz, PhD

Assistant Professor

Department of Environmental Studies

SUNY College of Environmental Science and Forestry

680-322-1613

mmikulew@esf.edu

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**From:** Nyer, Samantha <Nyer.Samantha@epa.gov>  
**Sent:** Monday, August 11, 2025 9:58 PM  
**To:** chipsnepa  
**Subject:** [EXTERNAL] EPA Region 2 Comment Letter - Draft Environmental Impact Statement for the Micron Semiconductor Manufacturing Project, Clay, NY  
**Attachments:** Micron\_EPA DEIS Comment Letter\_081125\_Sig.pdf

Hi David,

Please find attached the comment letter from EPA Region 2 on the Micron Semiconductor Manufacturing Project Draft Environmental Impact Statement (EIS). The EPA thanks the Department of Commerce for the chance to review the EIS and looks forward to our continued coordination on this project. Please don't hesitate to contact us with any questions you might have.

Thank you,  
Samantha

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Samantha Nyer, PhD  
Physical Scientist, Environmental Review and Strategic Programs Section  
U.S. Environmental Protection Agency - Region 2  
212-637-3666



## REGION 2 ADMINISTRATOR

NEW YORK, N.Y. 10007

**August 11, 2025**

### **SENT VIA ELECTRONIC MAIL**

Mr. David Frenkel  
Environmental Division Director  
CHIPS for America Program  
National Institute for Standards and Technology  
E-mail: [Frenkel.David@CHIPS.gov](mailto:Frenkel.David@CHIPS.gov)

RE: Micron Semiconductor Fabrication Facility in Clay, New York – Draft Environmental Impact Statement Review

Dear Mr. Frenkel,

The United States Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (EIS) prepared by the Department of Commerce (DOC) for the Micron Semiconductor Manufacturing Project (Project) in Clay, New York pursuant to the National Environmental Policy Act (NEPA) and our NEPA review authority under Section 309 of the Clean Air Act (CAA), 42 U.S.C. § 7609. The CAA Section 309 role is unique to the EPA. It requires the EPA to review and comment on the environmental impact of any proposed federal action subject to NEPA's environmental impact statement requirements and to make its comments public.

The EPA is serving as a Cooperating Agency during the development of the EIS. We provided comments on the Notice of Intent (April 4, 2024), Preliminary Draft EIS (April 7, 2025), and on a rolling basis throughout the EIS development. We thank the DOC Creating Helpful Incentives to Produce Semiconductors (CHIPS) for America Program for addressing many of the comments we provided following our review of the earlier versions of the EIS and appreciate the opportunity to review and comment on the Draft EIS.

The Draft EIS analyzes the impacts of CHIPS awarding funding to Micron New York Semiconductor Manufacturing LLC (Applicant) for the purpose of constructing commercial semiconductor fabrication facilities in Clay, New York (the Project or Proposed Action). The Project would primarily consist of the following components:

1. Construction of the Micron Campus, including the four fabrication units (fabs), ancillary support facilities, ingress and egress roads, driveways, and parking, within a site totaling approximately 1,377 acres;
2. Construction of a rail spur and material conveyance facility on approximately 38 acres west

- of 8625 Caughdenoy Road in Clay, NY 13041 (the Rail Spur Site);
3. Construction of a childcare center, healthcare center, and recreational center on an approximately 31-acre parcel located at 9100 Caughdenoy Road, Brewerton, NY 13029 (the Childcare Site); and,
  4. Leasing of 360,000-500,000 square feet (sq. ft.) of existing warehouse space in an industrially zoned area at a location to be determined within 20 miles of the Micron Campus (the Warehouse Site).

In addition, several utility and infrastructure improvements are required to meet the Project's electricity, natural gas, water supply, wastewater, and telecommunications needs.

The Draft EIS evaluates the No Action Alternative, and the Preferred Action Alternative (construction of the Project and the associated connected actions). Upon completion, the Project would be the largest domestic producer of dynamic random-access memory (DRAM) chips, which have crucial applications in military equipment, cybersecurity technology, the aerospace industry, artificial intelligence (AI), and other cutting-edge uses, as well as more common areas of the domestic consumer economy. The EPA recognizes the importance of the Project in supporting the national goal of strengthening domestic supply chains for semiconductors necessary for the national security, manufacturing, critical infrastructure, and technology leadership of the U.S. We are providing the enclosed comments for your consideration, with a focus on air and water resources consistent with our Clean Water Act (CWA) and CAA authorities.

We look forward to continuing the ongoing constructive participation in the NEPA process. If you have any questions, please contact me at (212) 637-5000, or EPA Region 2 Strategic Programs and Community Based Funding Branch Manager, Dave Kluesner at [kluesner.dave@epa.gov](mailto:kluesner.dave@epa.gov) or 212-637-3653.

Sincerely,

**MICHAEL  
MARTUCCI**

Digitally signed by  
MICHAEL MARTUCCI  
Date: 2025.08.11  
21:31:15 -04'00'

Michael R. Martucci  
Regional Administrator

### **General Comments**

#### **Statutory Authorities and Regulations: 42 U.S.C. § 7609; 42 U.S.C. § 4321 et seq.**

We offer the following recommendations to improve the clarity and completeness of the Draft EIS:

#### *Executive Summary*

- The Executive Summary should clearly state the purpose and need for the Project, as that information is critical in describing the validity of alternatives.

#### *Introduction*

- The criteria by which the commercial viability of the Project is evaluated should be defined in this section of the EIS. Such information would better support the Project's purpose and need, as the economic feasibility is an essential component in funding projects to meet DOC's objectives under the CHIPS act.
- The Draft EIS discusses additional regulatory requirements including permits and environmental reviews that will be required for the Project and connected actions. EPA suggests that the Final EIS identify the anticipated timeline for these processes.

#### *Alternatives*

- The alternatives section of the Draft EIS states that the discussion of alternatives required weighing effects of one resource area against another resource. Please briefly discuss the criteria for how this weighting was incorporated into impact determinations for the resource areas. Please provide clear definitions for impact level classifications or criteria used to assess significance of potential impacts for each resource area in the Final EIS.

#### *Mitigation Measures*

- EPA recommends creating a section that lists all mitigation measures considered in the Final EIS.

### **Air Quality**

#### **Statutory Authorities and Regulations: 42 U.S.C § 7609; 42 U.S.C. § 4321 et seq.; 40 C.F.R. Part 51 and § 52.21; 40 C.F.R. §§ 93.107 and 93.109**

EPA has reviewed the Draft EIS Preferred Action Alternative with respect to the assessment of air quality impacts and has identified several areas where the analysis and discussion of impacts could be strengthened including defining clear criteria for air quality impacts.

#### **EPA's recommendations for the Final EIS:**

##### *Construction/Stationary Sources:*

- Please modify the information in Table 3.6-1 to reflect a revised annual sulfur dioxide (SO<sub>2</sub>) NAAQS standard of 10 ppb.<sup>1</sup>

##### *Mobile Sources:*

- Please incorporate a more explicit explanation of the intersections that fail hot spot analyses and what that signifies in Appendix I-3.
- EPA suggests the best management practices (BMPs)/mitigation measures for construction equipment include best available control technology as feasible into contract specifications to reduce emissions during construction.

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<sup>1</sup> See <https://www.epa.gov/so2-pollution/timeline-sulfur-dioxide-national-ambient-air-quality-standards-naaqs>

### **Wetlands and Water Resources**

**Statutory Authorities and Regulations: 42 U.S.C § 7609; 33 U.S.C. § 1341; 33 U.S.C. § 1342; 33 U.S.C. § 1344; 42 U.S.C. § 4321 et seq.; 40 C.F.R. Part 230**

The EPA has been coordinating with the U.S. Army Corps of Engineers, as the CWA Section 404 permitting authority, DOC, as the lead agency for the Project, and Micron (the Applicant), on various aspects of the CWA permit and the associated mitigation plans under CWA Section 404 and the 404 (b)(1) Guidelines. Please refer to the comments provided directly from EPA Region 2 Water Division on these aspects of the Project. In addition, we recommend the following:

- EPA recommends including a map of surface hydrology connecting on-site aquatic resources to downstream traditionally navigable waters.

**RG**  
NYSUT **NYSUT Retiree Council 7**  
4983 Brittonfield Parkway, P. O. Box 247, East Syracuse, NY 13057

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August 11, 2025

ATTN: Micron Project  
Onondaga County Industrial Development Agency (OCIDA)  
335 Montgomery Street, Floor 2M  
Syracuse, NY 13202

NYSUT Retiree Council 7, representing thousands of retired educators in Central New York, welcomes Micron as a good neighbor. To ensure that relationship is a long and beneficial one to both parties, we ask that certain guidelines be established.

NYSUT Retiree Council 7, along with many other union, environmental, workforce, public health and safety organizations ask that the organizations that control Micron's development in Central New York take into consideration workplace safety; creation of good paying jobs in a union- accepting climate; no adverse impact on school funding; environmental quality and continued monitoring; good housing and transportation.

First, the health and safety from toxic chemicals used to make chips must not pollute air, soil, fish, wildlife, and drinking water. A long term, continuing monitoring of this must be in the plan with enough resources to sustain it.

Second, commit to ensuring that clean water and energy in abundance will be affordable to the area into the future. Ratepayers should not shoulder the burden. Also, generate renewable energy with a low carbon impact.

Third, safe working conditions are necessary. We know the workers will be exposed to toxic chemicals and all measures must be taken for their sake as well as their families.

In addition, we seek pay equity, and a diverse workforce that would be allowed to unionize without adverse ramifications. To further aid working families, public transportation and child care on site or near would be helpful.

Fourth, invest in housing needed for existing and new residents. Mixed income and affordable housing will be needed, and micron must be involved in a cooperative effort to bring that about.

Fifth, tax abatements to Micron must not come at the expense of schools and students.

According to a report issued by "Good Jobs First NY" schools lost a total of \$ 1.8 billion in property tax revenue due to tax abatements granted by IDAs.

We would appreciate support and actions on these guidelines. We look forward to your response.

Sincerely,

NYSUT Retiree Council 7

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**From:** Alma Lowry <[alma.lowry@gmail.com](mailto:alma.lowry@gmail.com)>

**Sent:** Monday, August 11, 2025 3:50 PM

**To:** Frenkel, David N. (Fed) <[david.frenkel@chips.gov](mailto:david.frenkel@chips.gov)>; DeJong, Holly A. (Fed) <[holly.dejong@chips.gov](mailto:holly.dejong@chips.gov)>

**Subject:** [EXTERNAL] Fwd: Onondaga Nation's Comments on Micron DEIS

David and Holly:

I submitted comments on the Micron DEIS this afternoon via the CHIPS e-mail address. I got an out-of-office message in response form nse message from Mary Volcko at Barclay Damon. Is that law firm working on behalf of one of the agencies or are the public comments going to Micron and its staff as well?

Thanks,

Alma

----- Forwarded message -----

**From:** Alma Lowry <[alma.lowry@gmail.com](mailto:alma.lowry@gmail.com)>

**Date:** Mon, Aug 11, 2025 at 3:24 PM

**Subject:** Onondaga Nation's Comments on Micron DEIS

**To:** <[CHIPSNEPA@chips.gov](mailto:CHIPSNEPA@chips.gov)>

Dear CHIPS Staff:

Please find attached the Onondaga Nation's comments on the Micron DEIS.

Best,

Alma Lowry

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Alma Lowry, Of Counsel  
Law Office of Joseph Heath  
General Counsel to the Onondaga Nation

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Alma Lowry, Of Counsel  
Law Office of Joseph Heath  
General Counsel to the Onondaga Nation

**LAW OFFICE OF JOSEPH J. HEATH**  
GENERAL COUNSEL FOR THE ONONDAGA NATION  
512 JAMESVILLE AVENUE  
SYRACUSE, NEW YORK 13210-1502

August 11, 2025

Onondaga County Industrial Development Agency  
335 Montgomery Street, 2d Floor  
Syracuse, NY 13202  
Attn: Micron Project Staff

David Frenkel and Holly DeJong  
Department of Commerce/Office of CHIPS  
[CHIPSNEPA@chips.gov](mailto:CHIPSNEPA@chips.gov)

VIA ELECTRONIC MAIL

**Re: Onondaga Nation Comments on the Micron DEIS**

Dear OCIDA and CHIPS Staff:

On behalf of the Onondaga Nation, I am submitting the following comments on the Draft Environmental Impact Statement (DEIS) issued on DATE for the Micron semiconductor chip fabrication facility ("Micron project"). Because the Onondaga Nation recognized the significance of the Micron project and its potential environmental and social impacts, the Nation acted as a participating entity in the development of the DEIS. Some of the Nation's concerns were addressed in that process, but many were not. The comments submitted today focus on those unaddressed concerns and on additional issues that have become apparent based on the publicly released DEIS.

The Onondaga Nation has a special role to play in environmental matters in this region. The Onondaga Nation is the central fire of the Haudenosaunee Confederacy, which also includes the Seneca, Tuscarora, Cayuga, Oneida, and Mohawk Nations. The traditional territory of the Nation covers 2.5 million acres centered on Onondaga Lake near Syracuse, but extending north to the Great Lakes and south into Pennsylvania. The "affected area" for the Micron project, as it is defined in the DEIS, falls entirely within the Nation's traditional territory. The Nation's unique relationship with this land was recognized under the 1794 Treaty of Canandaigua, in which the United States recognized this connection and guaranteed the Nation's "free use and enjoyment" of its original territories.

Based on their unique spiritual and historic relationship with the land as embodied in the Gayanashagowa or the Great Law of Peace, the Nation has acted as stewards and caretaker of the lands within its traditional territories for centuries. The Nation's relationship to the land, water, plants, animals, and fish is governed by a bond of thanksgiving and care. Just as the natural world has provided for the people of the Onondaga Nation, the Onondaga Nation is bound to care for the natural world. The Nation has not abandoned these ties or this duty of care over the two centuries since this Treaty was signed. Despite disruptions caused by the influx of settlers, illegal takings of land by New York, and widespread privatization and industrialization, generations of Nation citizens have lived and continue to live in deep connection to the land and water within this traditional territory. The Nation submits these comments from that perspective and with an intent to fulfill that duty of care for the natural world.

In addition, the area directly affected by the proposed Micron project and its connected actions is of particular cultural and historical significance to the Onondaga Nation. Many recognized historic Onondaga fishing sites fall within the affected area, including sites at the Oneida Lake outlet to the Oneida River, sites just north and south of the point where the Oneida and Seneca join to form the Oswego River (the "Three Rivers Area"), sites at the northern and southern most bends in the Oneida River, and sites further west. Bradley, J. (2020), *Onondaga and Empire: An Iroquoian People in an Imperial Era*, New York State Museum Bulletin No. 514, p. 38. Onondaga built "enormous stone weirs" at these locations, which were routinely for "hundreds, if not thousands, of years." Bradley, 2020, pp. 38-39. The area was host to semipermanent fishing camps and long-term fishing villages as well. Bradley, p. 38. The Three Rivers Area just west and south of the proposed Micron project and a stone's throw from the connected actions at Oak Orchard Wastewater Treatment Plant, was an historic meeting place for Onondaga Nation citizens scattered across the Nation's traditional territory and for meetings of the larger Confederacy. For all of these reasons, the Nation holds this area to be sacred. Any development that might disturb historic sites or cause damage to the natural world here is of particular concern.

The Onondaga Nation recognizes that the semiconductor industry is a necessity in the modern world and that the Micron project will have benefits for the region in terms of job creation and income generation. However, these stated benefits come with significant environmental and public health risks. The reviewing agencies must acknowledge these inherent dangers, conduct an in-depth and detailed review of the project that does not simply rely on other federal laws to limit harm, demand transparency with respect to the hazardous materials and wastes used in or produced by the manufacturing process, and insist on regular monitoring and public reporting where those details are not yet known. In addition, the reviewing agencies must hold Micron accountable for avoiding or mitigating potential harms to the extent permitted by law. This requires consideration of avoidance or mitigation strategies that go above and beyond the minimum requirements of applicable federal or state law.

The DEIS is an attempt to meet these obligations and it provides a lengthy discussion of the project, its impacts on a range of issues, and the applicable laws and regulations. Despite the voluminous nature of the DEIS, the Nation is concerned that, for many issues, the analysis is too limited and reasonably foreseeable significant and adverse environmental impacts have gone unreviewed or been addressed in overly broad strokes, not the detailed, “hard look” required by both federal and state law. 42 U.S.C. § 4332(C); NY ECL §§ 8-0105(7), 8-0109. *See also Matter of St Elizabeth Garden, Inc. v. City of New York*, 42 N.Y.3d 992, 997 (2024); *Wilderness Society v. Salazar*, 603 F.Supp.2d 52 (D.C. Cir. 2009); *Neighbors of Cuddy Mountain v. United States Forest Service*, 137 F.3d 1372 (9<sup>th</sup> Cir. 1998).

Specifically, the Nation views the DEIS as falling short for the following reasons. The alternatives analysis is too limited. The DEIS provides insufficient information on the use and potential impacts of hazardous materials, such as PFAS, or the handling of hazardous wastes. The analysis of wetlands and wildlife impacts is too narrow and fails to properly consider harm related to loss of habitat connectivity or the potential impacts of off-site project-related effects, such as increased traffic or open-space development for new commercial spaces or housing. The DEIS also fails to consider reasonably foreseeable impacts from its substantial energy needs, including expanded reliance on nuclear power within New York State, or to properly grapple with the climate impacts of the project. The air quality impact analysis does not properly justify its reliance on distant monitoring data. More generally, the DEIS frequently relies on legal compliance to find that environmental impacts are not significant. Finally, additional mitigation measures should be considered to limit anticipated adverse impacts and to provide greater public awareness of and input on the additional impacts that will inevitably emerge over the project’s 16-year construction timeline and decades-long operations.

**I. The DEIS does not consider a sufficient range of alternatives.**

The DEIS considers only two alternatives – the no-build option and the preferred option. Other possible alternatives, including relocating the plant entirely or building a smaller facility, were deemed not possible or not able to meet the “purpose and need” for the project. This decision is unjustified for at least two reasons. First, the overarching purpose and need for the project was translated into an extremely narrow production goal, which was never properly explained or justified. Second, the DEIS fails to consider recent changes in the domestic chip production landscape that may affect the way that the overall project purpose and need is translated into an on-the-ground production goal.

This DEIS was designed to serve the purposes of both the National Environmental Policy Act (NEPA) and the New York State Environmental Quality Review Act (SEQRA). Both NEPA and SEQRA require consideration of “reasonable” alternatives to the preferred or proposed action. *Vermont Yankee Nuclear Power Co. v. Natural Resources Defense Council*, 435 U.S. 519 (1978); *Jackson v. New York State*

*Urban Development Corporation*, 67 N.Y.2d 400, 414-415 (1986). In this case, the blanket rejection of any alternative except the no-action and preferred alternatives, particularly alternatives centered on smaller facilities, is not well justified and appears to be unreasonable.

The DEIS mentions, but quickly discards, two- or three-fab alternatives, insisting that only the preferred four-fab alternative meets Micron's goal of financial viability and the governments' goals of increasing domestic chip production. However, the justification for this limitation is insufficient and not terribly compelling.

First, the DEIS asserts that, to be competitive and take advantage of economies of scale, Micron must build a four-fab alternative. In support, the DEIS provides data on the size of similar facilities in the United States and around the world operated by Micron and two of its competitors. According to this data, one competitor has a single facility larger than the proposed Micron project (more than 2,500,000 square feet of cleanroom) and the other has a facility comparable to the proposed Micron project (approximately 2,100,000 square feet of cleanroom). DEIS, p. 1-10, Fig. 1-1.2. The other five competitor-owned facilities shown in this figure are at or below 2,000,000 square feet of cleanroom space. Most of the facilities listed are well below this scale. While the DEIS notes proposals for additional large-scale production facilities in South Korea, no information about the stage of the proposal or the likelihood of approval is provided. DEIS, p. 1-7, fn 7.

The DEIS also argues that the per wafer production costs in smaller two- or three-fab facilities would be much higher, making a smaller project economically infeasible for Micron. This analysis is based on a capital asset utilization (CAU) rate as calculated for various cleanroom space represented in Appendix A, Figure A-2. Micron asserts that the CAU rate for a two-fab alternative would be 6.7% lower than for a four-fab alternative and that it would have to invest \$3.3 billion more in equipment costs to achieve the same production levels as the proposed four-fab alternative. DEIS, App. A, p. A-6. Setting aside the important fact that this assessment cannot be independently verified based on the figure provided,<sup>1</sup> this argument rests on an assumption that the Micron project in Clay must independently meet the DRAM production goals set by the U.S. Department of Commerce "necessary to offset potential disruptions to the U.S. economic and national security." DEIS, p. 1-8. This is problematic for two reasons. First, the DEIS does not properly justify the stated production goal, meaning that the public

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<sup>1</sup> The graph provided as Figure A-2 plots CAU against square feet of clean room space. However, neither axis has numeric markers, meaning that there is no way to determine the CAU for any particular amount of clean room space or whether a two-fab or four-fab alternative is even represented on the graph as included. In addition, the graph appears to be a flattening parabola, meaning that the incremental CAU per additional square foot of cleanroom space will approach zero at some point. Without numeric markers on either axis, it's impossible to determine at what point that might happen. It is completely impossible to evaluate the asserted 6.7 reduction in CAU rates for a two- versus four-fab alternative.

simply has to trust that the Commerce's assessment is reasonable. Second, even if we assume that this overall domestic production goal is appropriate, recently announced expansions at other Micron facilities may affect production goals for the Clay facility.

The DEIS sets a domestic DRAM wafer production goal of 12% of global DRAM manufacturing capacity, which translates into a weekly production rate of 13,000 DRAM wafers by 2028 and 52,000 by 2045. DEIS, p. 1-8. However, the only data cited that ties DRAM wafer use to critical economic and national security interests is a single estimate by the Boston Consulting Group, which the DEIS characterizes as asserting that 11% of the global memory chip output is used by "applications that are critical to U.S. economic and national security" interests. DEIS, App. A, p. A-4. This characterization does not appear to be supported by the cited report.<sup>2</sup> Assuming that this characterization is correct, however, the production goal of 11% of the current global memory chip output should be close to 48,000 DRAM wafers per week by 2050.

Further, for either goal, the production is described as Micron's nation-wide goal.<sup>3</sup> Micron has recently announced plans to build a second fab at its Idaho facility and a new plant on its Virginia site. (Day, Don (Jun 12, 2025). *Micron Announces Second Fab*, BoiseDev, <https://boisedev.com/news/2025/06/12/micron-boise-second/>). Given this significant expansion of Micron's domestic chip production, the 52,000 wafer per week production goal may be met in other ways, allowing for Micron to consider a scaled-down version of its Clay facility.

Because the DEIS rejected smaller scale facilities as infeasible, the DEIS provides no analysis of the benefits of a smaller facility, which could be weighed against increased production costs or other lost benefits. These benefits may be significant. For example, a three-fab facility could avoid significant wetland destruction. As currently designed, the first three fabs fall mostly west of Burnett Road. Elimination of Fab 4 might open space for construction of BIO fields and WWTPs within the southern footprint of the facility, avoiding the intact wetlands east of Burnett Road. Three fabs

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<sup>2</sup> In reviewing the cited report, the reported 11% figure is not apparent. The report includes an exhibit labeled "Example: How the US could establish a minimum viable capacity to address its critical strategic risk in advanced logic manufacturing," which asserts that 9% of US semiconductor consumption in 2019 was consumed by "critical infrastructure." (Varas et al, 2021, p. 48, Exh. 22.) This critical infrastructure is defined to include defense and aerospace; telecom networks; energy, security and medical equipment; and data centers of government and essential sectors. (*Id.*) Our review did not find any obvious economic or defense uses of microchips that should be added to the 9% figure or any discussion of critical strategic needs at the DEIS-reported 11% level.

<sup>3</sup> "To meet CHIPS Incentives Program objectives, Micron Technology proposed to increase its U.S.-based DRAM production by a factor of 12 (i.e., to approximately 12 percent of global DRAM output) over the next two decades . . . . As part of its merits review of Micron's application, the Department of Commerce determined that Micron's proposal would achieve domestic memory production at the scale necessary to offset potential disruptions to U.S. economic and national security . . . ." DEIS, pp. 1-7, 1-8.

could also require fewer utility upgrades that are being constructed at taxpayer expense, reduce the facility's climate impacts, result in fewer traffic disruptions, and reduce construction impacts.

Other alternatives focused on changes to the proposed project design could also be considered. For example, Micron is proposing to build an 11,600-space parking lot. The proposed workforce will be approximately 9,000 employees working over multiple shifts. Assuming that no more than two-thirds of these employees are on site at any given time, Micron is proposing to build almost twice as many parking spaces as employees on site. Eliminating even 1,600 spaces could reduce the impermeable surfaces on site by 9 to 15 acres, which could have important benefits for wetlands and habitat preservation.

For all these reasons, the DEIS should be expanded to include additional alternatives. At minimum, it should specifically review the potential for a three-fab alternative and a facility with fewer parking spaces. In addition, in light of Micron's proposed expansions in Idaho and Virginia, the DEIS should reevaluate the viability of a two-fab alternative in the Clay location.

## **II. The DEIS repeatedly and improperly relies on legal compliance to find that environmental impacts are not significant.**

At multiple points in the sections on air, water, and hazardous waste impacts, the DEIS asserts that Micron will comply with applicable federal and state laws, regulations, and permits and therefore its operations will have no significant environmental impacts. This assertion is simply not appropriate and certainly does not fulfill agency obligations to take a "hard look" at the environmental impacts of its actions.

The characterization of legal compliance as a primary basis for the conclusion that the project will have no significant adverse impacts occurs throughout the DEIS. In Section 3.3, the DEIS asserts that the Micron project will have no significant adverse impacts on surface or ground water, essentially because the facility will comply with Stormwater Pollution Prevention Plans (SWPPPs) and will discharge industrial wastewaters to a new Industrial Wastewater Treatment Plant (IWWTP) at Oak Orchard, which the DEIS presumes will comply with discharge permits issued under the Clean Water Act (CWA), DEIS, pp. 3-83 to 3-86. In Section 3.6, the DEIS concludes that the Micron project will have no significant adverse impact on air quality, because it is projected to comply with National Ambient Air Quality Standards (NAAQS) for criteria air pollutants and with the established air emission standards for other pollutants. DEIS, p. 3-169. In Section 3.8 on solid and hazardous waste and hazardous materials management, the DEIS again leans on legal compliance to support its finding of no significant adverse impact. DEIS, p. 3-248 ("Micron would be required to manage all hazardous waste in compliance with applicable Federal and State laws and regulations

[in addition to engaging in waste minimization under an internal plan]. . . . Therefore, the Preferred Action Alternative would not result in significant adverse effects relating to the generation of solid or hazardous waste or the management of hazardous materials.”).

If all that is required to demonstrate the absence of significant adverse impacts is compliance with federal or state law, NEPA and SEQRA reviews would be very short and almost entirely useless. Every project proponent will undoubtedly express its intent to follow applicable law and comply with permits, meaning that any impacts subject to regulation could be assumed to be insignificant. Despite this fact, both NEPA and SEQRA mandate environmental review for major federal or state actions, including those impacts that are regulated by state or federal law. The goal of NEPA and SEQRA, therefore, must include a meaning review of the environmental impacts of otherwise legal actions. Federal courts considering this issue have agreed. *Environmental Defense Center v. Bureau of Ocean Management*, 36 F.4<sup>th</sup> 850, 874-875 (9<sup>th</sup> Cir. 2022).

There are circumstances, such as compliance with NAAQS which are based on achieving or maintaining ambient air standards designed to protect public health, the assumption that legal compliance means no significant adverse impact is somewhat reasonable. However, even this assumption is limited, since localized exceedances that create public health impacts are possible even in NAAQS-compliant airsheds. See Carlson, A.E. (2018), *The Clean Air Act’s Blind Spot: Microclimates and Hotspot Pollution*, 65 U.C.L.A. Law Rev. 1036.

For most other impacts, the assumption that legal compliance equates to insignificant impacts is not justified. For example, under the Clean Water Act, discharge limits are often based on best available technology, which may or may not result in compliance with applicable water quality standards. Water quality standards may not be designed to prevent any and all significant adverse impacts. They may, for example, be designed to protect fish propagation, not fish consumption or direct water contact. Most water quality standards are inadequate to protect subsistence fish consumption, which may be practiced by Native Nations, refugee populations, or low-income communities.

Further, some contaminants simply don’t have proper regulations established for them. PFAS, for example, is recognized as an emerging contaminant with the potential to cause significant harm to human health and the environment at very low levels of exposure. However, this emerging contaminant is not well understood or properly regulated. The DEIS discusses the evolving legal standards for PFAS at both the state and federal level but fails to plainly state that the vast majority of PFAS compounds are unregulated. Federal and New York State drinking water standards have been developed for a handful of PFAS substances. There are no federal or state standards for PFAS in air emission. Although there are federal reporting requirements for approximately 200 PFAS compounds, only two PFAS have been formally designated as

hazardous wastes and those compounds are no longer actively used by industry. EPA, Key EPA Actions to Address PFAS, available on-line at <https://www.epa.gov/pfas/key-epa-actions-address-pfas>. Meanwhile, hundreds of PFAS compounds are routinely used in routine use. EPA, Per- and Polyfluoroalkyl Substances (PFAS), available on-line at <https://www.epa.gov/pfas>. Studies from Cornell University indicate that wastewater from electronic manufacturing facilities routinely contain more than 40 PFAS “families” and more than 100 individual PFAS compounds. Jacob, P., Barzen-Hanson, K.A., and Helbling, D.E. (2021), Target and Nontarget Analysis of Per- and Polyfluoroalkyl Substances in Wastewater from Electronics Fabrication Facilities, Environmental Science and Technology, 55(4). Complying with applicable laws and permits says absolutely nothing about the impacts of discharges or emissions of such unregulated contaminants.

For these reasons, the DEIS should be amended to eliminate all bald claims that legal compliance translates into an absence of significant adverse impacts. Rather, the DEIS should incorporate quantitative or qualitative estimates of the contaminants that may be discharged into air or water or that may be released from solid and hazardous wastes or hazardous materials. The DEIS should then discuss the likely environmental and public health impacts of exposure to those contaminant levels. This assessment should include contaminants for which final discharge, emission, or exposure standards have not yet been set and should consider the potential for localized impacts.

**III. The air quality analysis fails to justify reliance on distant air monitoring data to assess compliance with applicable air quality standards or to consider the impacts of violations, exceedances, or upsets.**

The DEIS relies on modeling to assert that the Micron project will have no significant adverse impacts on air quality. This assessment is based on an assumption that the project will not result in a violation of NAAQS and will comply with other permit terms that set Annual and Short-Term Guideline Concentrations for other air pollutants. Although NAAQS compliance may be a reasonable basis for finding no significant adverse environmental impacts on a regional scale, there are shortfalls in the overall assessment of air quality impacts.

First, the analysis of NAAQS compliance relies on local monitoring data only for ozone and small particulate matter (PM<sub>2.5</sub>). For other criteria pollutants, the DEIS presumes that the affected environment’s air quality is likely better than or comparable to air quality measured in Rochester, New York more than 70 miles away. DEIS, Appendix I, p. I-4. This presumption is based on the more urban nature of the Rochester area. This may be a reasonable assumption, but it should be verified with some local monitoring data. While long-term data will not be available, targeted data gathered using mobile monitoring devices would be important in confirming the assumption that the Rochester monitoring data provides “conservatively high background concentrations.”

DEIS, App. I, p. I-4. In addition, there should be some consideration of on-going, localized air monitoring to reassure the public that the air quality monitoring was accurate.

Second, other than an assessment of combined stationary and mobile source impacts on particulate matter, the air quality assessment does not seem to consider the potential for localized air quality impacts from facility operations alone or from the combination of facility and traffic emissions. DEIS, App. I. The Stationary Air Quality Study Area, depicted in Figure 3.6-1 on p. 3-154, is an approximately 60 mile by 60 mile square. While the air quality analysis describes relying on a “receptor grid” that includes multiple monitors at various points extending up to 50 kilometers from the site boundary, the modeled “impacts” for NAAQS pollutants were reported as a single value. DEIS, App. I-1, pp. I-7, I-10. It is not clear how the more local monitoring data was used; whether the reported value for each of the NAAQS pollutants is an average or a maximum figure; or what the degree of variability likely to be found within the Air Quality Study Area. Even the more localized Regional (Mobile) Air Quality Study area is fairly large, including Syracuse to the south, Central Square to the north, and almost reaching Fulton to the west. Discussion of mobile source air impacts within this region as a whole similarly does not provide truly localized data. At minimum, this data should be better explained.

A detailed and localized analysis of air impacts may be particularly important for the contaminants (NO<sub>2</sub>, PM<sub>2.5</sub>, fluorine, and total fluoride) that are modeled to be quite close to the regulatory limits within the Stationary Air Quality Study Area on either a short-term or annual basis. DEIS, App. I, Table I-2, p. I-11. Assuming that the projected NAAQS levels are averages and not maximums, small variations in these contaminant levels might represent unhealthy or environmentally damaging exposures on a local scale. The analysis does not seem to include all contaminants that might be of concern for this facility – specifically, there is no mention of air modeling for PFAS or contaminants specifically identified as PFAS byproducts. And, as mentioned above, the only modeling data that appears to consider the combined effects of facility operations and mobile sources relates to particulate matter. DEIS, pp. 3-175 to 3-179. There are other contaminants of concern that are associated with both facility operations and mobile sources and should be the focus of a combined analysis – for example, NO<sub>x</sub>, CO, and SO<sub>2</sub>.

Third, the DEIS does not consider the risk of upset, exceedance, or other violations of air emission permits. However, no equipment works perfectly. Exceedances of permit terms are fairly common during start-up, shutdown, or maintenance procedures. In fact, such violations are so common that the Environmental Protection Agency (EPA), in the past, adopted and enforced regulations to address them

specifically.<sup>4</sup> As an experienced semiconductor manufacturer, Micron must have some idea regarding the frequency of upset conditions or exceedances related to operational changes. That information should be provided and assessed in the DEIS.

Other types of permit violations are also possible. According to the Environmental Working Group, as of October 25, 2024, of the 1,191 U.S. manufacturing facilities actively involved in semiconductor production, 10% had violated federal environmental laws and regulations in the last 10 years and 27% of the facilities that had individual discharge permits had violated those permits. (Environmental Working Group (2024, Oct. 25), “What the Building CHIPS America Act Could Mean for Public Health and the Environment,” available on-line at <https://www.ewg.org/news-insights/news/2024/10/what-building-chips-america-act-could-mean-public-health-and-environment>). Given the frequency of permit violations, some consideration should be given to this possibility.

For the reasons listed above, the DEIS should be revised to provide a more comprehensive and better justified assessment of air quality impacts. To properly justify the use of distant monitoring data, there should be some consideration of local air data – even if that data is from short-term monitoring conducted for the EIS specifically. The analysis should consider the potential for violations and exceedances and should consider localized impacts for air emissions other than mobile source pollution. Finally, the Nation urges OCIDA and the Department of Commerce to mandate on-going, local air monitoring to provide confirmation that the Micron project is not creating regional or local air quality impacts.

#### **IV. The DEIS provides insufficient information on the use and potential impacts of hazardous materials, including PFAS.**

The DEIS provides very limited information on the specific types and quantity of hazardous materials that may be used within the Micron project, the types and quantity of hazardous wastes that are likely to be generated, or the final fate of these wastes. For the most part, the DEIS discusses hazardous materials and wastes in generalities and does not provide the specifics necessary for the public to fully understand the risks presented by the use of hazardous materials or the generation and disposal of hazardous wastes from the project.

Rather than providing a complete list of the specific hazardous materials that might be used on site, the DEIS provides a short list of “extremely hazardous

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<sup>4</sup> in the past, both federal and state law provided for excusing such exceedances from enforcement actions if the regulatory agency deemed the violation to be unavoidable. See 40 C.F.R. 70.6(g) (2023); 6 N.Y.C.R.R. § 201-1.4(e) (2022). However, over the past few years, the EPA has begun to remove these “emergency defense” provisions from various regulations issued under the Clean Air Act (CAA) pursuant to *Natural Resources Defense Council v. EPA*, 749 F.3d 1055 (2014), which held that a similar provision in a hazardous air pollution regulation was beyond EPA’s authority.

substances” that would be regulated under a Risk Management Plan (ammonium hydroxide, anhydrous ammonia, hydrogen, hydrogen chloride, silane, chlorine, dichlorosilane, and HF), DEIS, p. 3-243 to 3-244, and otherwise lists categories of hazardous materials (acidic or caustic solutions; flammable or corrosive liquids; flammable, toxic, or pyrophoric gases; asphyxiants; toxics; oxidizers; or water reactive substances), DEIS, Tables 3.8-9 and 3.8-10, pp. 3-242 to 3-243. Hazardous wastes are similarly discussed in categorical terms, as drummed acids, drummed solvent, acids, solvent and arsenic waste, miscellaneous maintenance waste, and mercury waste. DEIS, Table 3.8-8.

These broad descriptions, and even the more specific list of extremely hazardous compounds, presented without any suggestion as to the quantity of such materials that would be routinely used or generated on the site does not provide the information needed to understand the risk posed. Given that full operation of this project is at least 16 years in the future, Micron may not be able to project the full list of materials or the specific quantities of each to be used in this project. However, data on the typical materials used and wastes generated by similar chip manufacturing facilities – either from industry-wide reporting or from prior Micron experience in the field – must be available. At minimum, that data should be provided and analyzed in this section.

The DEIS provides a slightly more specific analysis of PFAS use and disposal than of other hazardous production materials. Specifically, the DEIS acknowledges that its production processes will rely on PFAS compounds, that air emissions will have to be treated to control PFAS emissions, and that process-related wastewater will likely contain PFAS substances. However, even for this compound, there is no information on the exact types or amounts of PFAS compounds that will likely be present at the facility, used in production processes, or likely to be released via air emissions or wastewater discharges. Instead, as noted in Section II, *supra*, the DEIS asserts that PFAS wastes will cause no significant adverse effects on public health or the environment, because both Micron and the Oak Orchard Treatment Plant will comply with applicable environmental law. This is an inadequate assessment for several reasons.

PFAS is a common component of all semiconductor manufacturing and is likely used in and discharged from Micron’s other facilities. Micron relies on its experience in Idaho and Taiwan to estimate overall waste levels (Table 3.8-4, p. 3-232). It should be able to use that same experience to provide additional information on the type and amount of PFAS substances used in production, the discharge methods that have been implemented in other facilities, and their effectiveness.

Because PFAS is an “emerging contaminant,” despite its known health and environmental risks, environmental regulations haven’t caught up. Micron acknowledges that there are at least 10,000 PFAS substances known to be used in or produced by manufacturing processes. DEIS, p. 3-240. However, fewer than 10 PFAS substances have established federal or state drinking water standards that could be translated into

permit terms and, as noted above, there are no federal or New York state standards for PFAS in air emissions. This limited regulatory stance is further complicated by the lack of reliable detection methods. As stated in the DEIS, EPA's most up-to-date methods can detect only 40 PFAS substances. DEIS, p. 3-240. For these reasons, compliance with permit terms does not mean that all significant environmental effects are avoided. Rather, to determine likely environmental impacts, the DEIS must review specific data on the likely types and quantities of PFAS compounds that will be used and discharged or disposed of by the Micron project

Unfortunately, the description of PFAS wastes, discharges, and emissions – critical information to understanding the environmental impacts of the Micron project – is extremely limited, especially for PFAS discharged in the plant's wastewater. There is no effort to quantify or trace the PFAS that might be discharged in wastewater or to assess the effectiveness of available control technologies. Similarly, the DEIS does not properly analyze the potential contaminants in sludge generated by its on-site industrial wastewater treatment facility.

As discussed in the DEIS, industrial wastewater will be treated initially at an on-site industrial wastewater treatment plant (IWWTP). See DEIS, pp. 3-240 to 3-241, 3-277. The DEIS states that process-related wastewater “may” contain PFAS – a fact which, given the heavy reliance on PFAS compounds in semi-conductor fabrication, seems unavoidable not just possible. DEIS, pp. 3-239. The DEIS does not discuss on-site wastewater treatment in detail, simply noting that it will comply with its indirect discharge permit for industrial wastewater. DEIS, p. 3-241. Assuming that Micron will be required to remove some PFAS from wastewater under that indirect discharge permit, that contaminant is likely to end up in the on-site IWWTP sludge. This would limit the sludge's “beneficial reuse,” DEIS, Table 3.8-5, p. 3-235, and, in practical if not legal terms, may mean it should be treated as a hazardous waste. However, the DEIS never discusses the potential for PFAS in its on-site IWWTP sludge or acknowledges that IWWTP sludge may require special handling. This should be addressed.

The DEIS discusses the treatment of PFAS-containing wastewater at the Oak Orchard IWWTP in Section 3.3, noting that this proposed facility will include control technologies specifically designed for emerging contaminants, such as PFAS. DEIS, p. 3-83. In addition, the Oak Orchard IWWTP would be expected to monitor its discharges and comply with discharge standards contained in its CWA permit. DEIS, p. 3-83. However, this ignores the fact, recognized later in the DEIS, that current detection methods can only identify a small portion of PFAS compounds routinely used in industry, DEIS, p. 3.240, or that PFAS is largely unregulated, which makes the promise of monitoring and permit compliance less meaningful. A more detailed analysis of likely removal rates, possible PFAS discharges, and related environmental impacts must be added to the DEIS.

In addition to the incomplete assessment of PFAS in process-related wastewater streams, the DEIS does not appear to acknowledge the volume of waste that might be generated by its pre-process water purification process. According to the World Economic Forum, chip manufacturing facilities require “ultra pure” water with pollutants, minerals, and other impurities removed. Typically, 1,400 to 1,600 gallons of municipal water is required to generate 1,000 gallons of “ultra pure” water and the process can create significant volumes of wastewater contaminated with concentrated heavy metals and other pollutants. Kristen James (2024, July 19). The water challenge for semiconductor manufacturing: What needs to be done? World Economic Forum, available on-line at <https://www.weforum.org/stories/2024/07/the-water-challenge-for-semiconductor-manufacturing-and-big-tech-what-needs-to-be-done/>. See also CERES (April 2022). *Global Assessment of Private Sector Impacts on Water*, pp. 44-45, 59-60. The DEIS should provide some assessment of the contaminants expected to be removed in this pre-use purification process and the way that they will be handled.

For all the reasons discussed above, the DEIS should be revised to provide more detailed information on the type and quantity of hazardous materials to be used in the Micron project, the amount and type of hazardous or dangerous wastes that will be produced at the facility, and the specifics of its waste management plan. Particular attention should be paid to PFAS and to the management of PFAS in the wastewater stream and the sludge generated in Micron’s on-site IWWTP. Finally, the DEIS should consider the wastes likely to be produced by its pre-production water purification process and the management of those wastes.

**V. The DEIS improperly dismisses the potential impacts of industrial pollution on groundwater and connected surface water, particularly given the potential for karst structures in the area.**

The DEIS discusses the potential for ground or surface water contamination from spills, uncontrolled discharges, or stormwater runoff on the project site in a fairly superficial way. This assessment improperly minimizes the potential for broad groundwater contamination from plant operations.

First, as discussed in comments submitted by Sterling Water Stewards and adopted by reference herein, the project area is very likely to contain karst features in subsurface areas. Karst refers to “a landscape formed from the dissolution of soluble rock or rocks that contain minerals that are easily dissolved from the rock.” Kappel, W.M., Reddy, J.E., and Root, J.C. (2020), *Statewide Assessment of Karst Aquifers in New York with an Inventory of Closed-Depression and Focused-Recharge Features*, UGSG/Scientific Investigations Report 2020-5030, p. 3. The highly permeable bedrock aquifers in areas where karst has developed are at significant risk of contamination. Surface water run-off that contains contaminants can quickly enter the aquifer via the

sinkholes, enhanced bedrock fractures, and similar features, and then disperse throughout the aquifer. Kappel et al., p. 3. Even small areas of “karstification” can lead to significant contamination. Kappel et al., p. 8. New York State has been particularly concerned about the contamination of karst aquifers because of this potential for groundwater contaminants to move further and faster in karst than in other types of geologic structures.

The DEIS does not address the potential presence of karst features in the project area or the potential for “karstification” over time. This is concerning given that the geologic data suggests that the project area is susceptible to karstification. The DEIS should be revised to address this concern.

Second and more generally, the DEIS largely dismisses the potential for water pollution impacts from the project on the basis that it will have and will comply with stormwater management permits, spill response plans, and discharge permits for its industrial wastewater. As noted above, compliance with permits should not be used as a substitute for an actual impact assessment, particularly where a project uses and discharges unregulated contaminants like PFAS. Further, the assumption that Micron will never violate those standards – through improperly contained spills, failure to fully execute a stormwater management plan, or exceedances or upsets from permitted discharge points – is unwarranted generally and is certainly unwarranted without data demonstrating that such an assumption is reasonable. Data on spills, violations, upsets, and exceedances within the domestic semiconductor industry as a whole or within Micron facilities generally should be reviewed to create a more grounded and fact-based assessment of water pollution risks.

For the reasons discussed above, the DEIS should be amended to provide a more robust discussion of the potential for and likely impact of groundwater or surface water contamination from the Micron project. The revision should specifically consider the potential impacts of karst/karstification on groundwater contamination as well as the potential for ground or surface water contamination from spills, permit violations, or permissible upsets or exceedances.

## **VI. Analysis of wetlands and wildlife impacts are too narrowly construed.**

The DEIS provides detailed information on the wetlands, the threatened or endangered species, and the other plants and wildlife present on the project site. It considers project impacts on these elements of the natural world due to the conversion of undeveloped or agricultural land to a manufacturing complex. The analysis also provides a general overview of the mitigation measures proposed to reduce harms to these communities. However, the DEIS fails to provide specific mitigation plans or to properly consider harm related to loss of habitat connectivity or the potential impacts of

off-site project-related effects, such as increased traffic or open-space development for new commercial spaces or housing.

The Micron project as proposed will destroy 193.38 acres of jurisdictional wetlands. Micron proposes to mitigate these losses by enhancing, restoring, or establishing 422.14 acres of wetlands directly and purchasing in-lieu fee credits for an additional 9 acres. DEIS, Table 3.3-13, p. 3-92. This results in a 2:1 mitigation ratio. However, the adequacy of this mitigation proposal is not addressed beyond the implied standard that more is better. Several issues should be more explicitly addressed.

The wetlands that will be lost are part of a contiguous or connected parcel of wetlands. Almost half of the wetlands currently on site will be destroyed by this project. The replacement wetlands being created or enhanced as mitigation will be scattered across at least six sites. The DEIS lists fragmentation as a potential adverse impact, but does not attempt to quantify, in any way, the ecological value of these scattered wetlands compared to the value of the former large contiguous parcel. The lost area include many acres of mature forested wetlands. The replacement wetlands are largely agricultural areas where forests will have to be established over many years. According to the DEIS, 45% of the forested wetlands, including 88% of the red maple hardwood swamps, 97% of the hemlock-hardwood swamps, and 19% of floodplain forests, will be destroyed by the Micron project. DEIS, Table 3.307, p. 3073. Red maple trees don't reach mature height (approximately 20') for 10 – 20 years. Eastern hemlocks are even slower growing. The DEIS makes no effort to quantify the ecological value of these developing wetlands over time, compare them to the value of an established wetland forest, or determine when the ecological value of the developing wetlands will reach the value of the existing wetlands.

The DEIS also pays limited attention to how the remaining wetlands on the Micron project site will be affected by the overall project. The loss of buffer areas and adjacent wetlands is an issue, as acknowledged but not meaningfully addressed by the DEIS. The Micron project will not only remove half the wetlands on site, it will eliminate 6,283 linear feet of stream channels and create 645 acres of additional impervious surfaces on the project site. DEIS, pp. 3-75, 3-76. Stormwater runoff will be carefully managed to limit surface and groundwater contamination from construction and plant operations. Further, the DEIS suggests that Micron may need to dewater the active construction area, meaning that groundwater will be entirely removed from or moved to other parts of the groundwater system continuously for the next 16 years. DEIS, p. 3-79. These disruptions to ground and surface water flow on the Micron project site will almost certainly affect groundwater recharge to the remaining wetlands on site and even to adjacent wetlands. The DEIS fails to consider this issue at all.

The DEIS also gives short shrift to the analysis of the flood-related or other impacts of wetland loss, increase in impervious surfaces, artificial stormwater flow under a stormwater management plan, and other related surface and groundwater flow

changes on adjacent properties. The dramatic changes from a forested site with waterways and no impervious surfaces to a primarily built and paved environment may alter flooding patterns, stormwater flow, or even groundwater recharge to adjacent properties. This should be discussed in more detail.

Birds, bats, and other wildlife will be affected by the construction of the Micron project and the loss of forests, wetlands, and grasslands on the site. Disturbance-intolerant species, to the extent that they are mobile, will be driven from the site, but the DEIS assumes that they will move to the remaining wetland areas on-site or to nearby locations with suitable habitat. DEIS, p. 3-118. However, the DEIS does not assess the availability of suitable habitat within the migratory range of affected mammals or birds. In addition, the DEIS fails to consider the effects of other changes in the area on wildlife. Traffic and construction noise, for example, is analyzed for its effects on sensitive human receptors in the vicinity of the project. DEIS, p. 3-396. Other than the statement that disturbance-intolerant species will abandon areas of construction, the DEIS does not consider the impacts of project-related noise, particularly on-going traffic noise, on wildlife. The DEIS examines changes in traffic patterns in great detail but does not consider the potential for increased traffic in the broader area to harm wildlife, either by cutting off migration routes or by increasing the number of traffic-related wildlife fatalities.

The DEIS pays particular attention to certain endangered bats (the Indiana bat, the northern long-eared bat, and the tricolored bat) and grassland birds considered to be threatened or “of special concern” (northern harrier, osprey, vesper sparrow, sharp-skinned hawk, and golden warbler). In both instances, Micron proposes to protect alternative habitats as mitigation for the endangered/threatened bat and bird habitat lost due to project construction DEIS, App. G-4, p. 8-104 to 8-110; App. G-4, App. A, Att. 4; and App. G-5, p. i. However, the DEIS provides limited details about the proposed mitigation. The bat habitat discussion includes some details on sponsored research and gives very general information about locations (dots on a map), size, and current status of mitigation area. DEIS, pp. 3-135 to 3-136; App. G-4, p. 8-104 to 8-110; App. G-4, App. A, Att. 4. The grassland bird mitigation plan “description” appears to be limited to an assertion that Micron will protect three times the amount of “high quality” habitat elsewhere than was lost on the project site. DEIS, p. 3-136, App. G-5, p. i. The DEIS also promises that Micron will develop a “mitigation masterplan” sometime in the future. DEIS, App. G-4, p. 8-107. These mitigation measures are held out as sufficient to reduce “unavoidable significant adverse effects” on bats and bird, but the information provided is not adequate to assess the likely effectiveness of any of the mitigation proposals.

There is no discussion, for example, about what is required for “high quality” habitat for grassland birds or any information about the quality of habitat on the sites proposed as mitigation. The DEIS does not discuss the potential for endangered bats

currently using the Micron site as a maternity roost to find or use the mitigation habitats, some of which are more than 10 miles away, or for these mitigation habitats to draw other populations of endangered bats. There is no discussion of the likely impacts of roost fidelity – that is, the tendency for bats to return to the same roost trees year after year – on bat populations. Additional details on the mitigation proposals and an analysis of their likely effectiveness is necessary to support the assertion that the proposals will sufficiently reduce unavoidable significant and adverse impacts of the Micron project.

For all of these reasons, the DEIS should be revised to provide more detailed analysis of project impacts on groundwater, surface water, and wetlands the site and the birds, bats, mammals, and other wildlife that rely on those spaces. At minimum, the DEIS should provide a more detailed accounting of the value lost by wetlands destruction and the value provide by the replacement wetlands; the impacts of wetlands loss and groundwater/surface water disruptions on the wetlands remaining on campus; and the effects of noise, vibrations, increased traffic, and other project-related impacts both on- and off-site on wildlife.

**VII. The DEIS fails to consider reasonably foreseeable impacts from its substantial energy and water needs, including significant adverse effects on greenhouse gas production and expanded reliance on nuclear power within New York State.**

The Micron project will put an enormous burden on the energy, water, and wastewater processing infrastructure in the region. At full build-out, the facility will draw 48 million gallons of water and produce 2.6 million gallons of wastewater daily. DEIS, pp. 3-273, 3-275. It will also require almost 16,000 GWh of electricity annually. DEIS, p. 3-269. This is as much electricity as the states of Vermont and New Hampshire combined and more than the available electricity currently produced in this area. Unfortunately, the DEIS does not provide an in-depth assessment of environmental impacts that its water use or the massive electricity draw, in particular, may create.

While the DEIS provides quite a bit of detail on the amount of fresh water needed for the project and the infrastructure expansion required to meet that need, there is more limited discussion of the potential impact of this significantly higher water withdrawal on Lake Ontario or on the near-shore ecosystem from which the water will be drawn. The DEIS also recognizes that project-induced growth is likely to increase water demand in Onondaga County by an additional 6.6 to 9.4 MGD (p. 3-274) but does not consider these increased demands in the context of demand trends in the area absent the Micron project or the overall water demands on Lake Ontario. These gaps should be addressed.

The discussion of electricity demands is more problematic. The DEIS asserts that there is “spare” electricity produced in NYSEERDA Zone C, which includes the project

site. Approximately 50% of the current annual Zone C production of 29,776 GWh is not used within the region. While this statement may be true, it does not provide a full picture of the issue. New York as a whole produces less energy than it uses. U.S. Energy Information Administration (US EIA) (2025), New York: State Profile and Energy Estimates, available on-line at <https://www.eia.gov/state/analysis.php?sid=NY#16>. The excess energy produced in Zone C “currently flows to other load zones and demand areas, including downstate zones that are net consumers of electricity.” DEIS, p. 3-264. Further, electricity demands within the state are expected to increase by “roughly 50 to 90 percent over the next 20 years,” essentially the same time period as Micron’s proposed construction. DEIS, p. 3-264. In combination, this means that the heavy electricity demand created by the Micron facility will displace existing users and consume all of the “excess” electricity that might be needed to accommodate increased power demands within Zone C over the next 20 years.

By 2045, electricity demand from current users in Zone C can be expected to increase to between 22,039.5 GWh and 27,916.7 GWh. Assuming stable production, that will leave only 1,859.3 GWh to 7,737.5 GWh annually for Micron, resulting in an electricity deficit for the project of between 27% and 46% of its projected needs at full build. This deficit is much greater than the 591 GWh or -2% deficit reported in the DEIS. DEIS, Table 3.10-1, pp. 3-269 to 3-270. Further, the Micron-specific deficit must be considered in the context of a projected 10% deficit in electricity generation across New York by 2040. James E. Hanly (2023, Aug 21), “Micron v. New York Energy Policy,” Empire Center for Public Policy, available at <https://www.empirecenter.org/publications/micron-vs-new-york-energy-policy/#:~:text=Micron%20will%20need%20to%20draw,be%20supplied%20by%20renewable%20energy.>) In addition, Micron’s laudable promise to use only renewable electricity in its facility is likely to create a significant burden on the supply of renewable power and of Renewable Energy Credits (RECs) throughout the state.

Rather than discussing the potential impacts of displacing the existing users of the Zone C electricity surplus, the projected regional and state-wide deficits, the overall increase in electricity demands related to project-induced growth, or the potential shortfall in renewable electricity and RECs, the DEIS simply states that uncertain future demand makes it impossible to assess any impact and that, if there are power deficits in future, NYSERDA will address them by permitting additional power generation projects. However, data gaps do not entirely excuse analysis of reasonably foreseeable impacts. *Robertson v. Methow Valley Citizens’ Council*, 490 U.S. 332, 354 (1989). In this case, there is sufficient data to provide a more detailed analysis of the potential impacts of Micron’s direct power demands, even if the broader impacts of induced growth are not ascertainable.

At minimum, the DEIS should be expanded to consider the impact of the significant shortfall in regional electricity production, based on projected growth in power

demand and to consider the effects of a more limited electricity supply beyond Zone C as Micron takes up regionally generated power. In addition, because Micron has committed to using 100% renewable or carbon-free electricity, the DEIS should consider the deficit in renewable power or renewable energy credits (RECs) specifically.

Finally, the DEIS should consider impacts related to the potential expansion of nuclear power within New York State in either the Utilities and Infrastructure or the Cumulative Impacts section. While the Micron project does not explicitly include an expansion of nuclear energy facilities, this expansion is a reasonably foreseeable impact of the project, as that term is understood under both NEPA and SEQRA.

New York State began publicly contemplating expanding its nuclear facilities in September 2024 and, by the end of June, had announced a definite plan for a new nuclear facility in the State. The State's turn toward increased nuclear power has been directly tied to the enormous demand for electricity that will be generated by the Micron project. In fact, NYSERDA specifically cited "[n]ew economic development opportunities in the state in high tech manufacturing" like Micron as one of the drivers for seeking "new technologies that can supplement renewable energy." Tim Knauss (2024, Nov 15), "NY seeks input from advanced nuclear companies, another sign of interest in new nukes," Syracuse.com, available on-line at [www.syracuse.com/news/2024/11/ny-seeks-input-from-advanced-nuclear-companies-another-sign-of-interest-in-new-nukes.html](http://www.syracuse.com/news/2024/11/ny-seeks-input-from-advanced-nuclear-companies-another-sign-of-interest-in-new-nukes.html).

Micron has also acknowledged that the availability of "reliable" nuclear power was one of the reasons that it chose to locate this proposed facility in upstate New York. Andrew Donovan (2024, May 24), "Even a blip of power outage could cost Micron's fabs thousands of dollars in ruined chips," LocalSyr.com, available on-line at <https://www.localsyr.com/news/local-news/even-a-blip-of-power-outage-could-cost-microns-fabs-thousands-of-dollars-in-ruined-chips/>. Tellingly, Micron has changed its sustainability commitment from using "100% renewable electricity" for the Micron project by 2025, Onondaga County Industrial Development Authority (OCIDA)/Micron, Key Terms and Conditions for the Development of the Micron Green Manufacturing Memory Chip Fab Campus in Clay, NY, p. 7, to using "100% carbon free electricity," DEIS, p. 0-9. Because electricity generated by nuclear facilities can be defined as carbon-free, but not as "renewable," this language change strongly suggests that Micron plans to rely on nuclear energy to meet the massive power demands of its facility.

The proposed expansion of nuclear energy and the failure to include this issue in the DEIS is of particular concern to the Onondaga Nation for many reasons. Two of the three nuclear power plants currently operating in New York (the Nine Mile Point and the James A. Fitzpatrick nuclear power plants) are located within the Onondaga Nation's traditional territory. Nuclear waste from these and other nuclear facilities are regularly transported through the Nation's currently recognized territory along Interstate Highway 81 (I-81). Further, the nuclear industry has had devastating impacts on Indigenous communities at every point in the production process from the deadly legacy created on

Navajo lands from uranium mining, to the contamination of Native lands from nuclear processing facilities, to the transportation of nuclear materials and waste through Native lands, to the proposed long-term storage at Yucca Mountain, a sacred space within the recognized territory of the Western Shoshone Nation. Any expansion of nuclear power in New York State would add to these impacts and to the environmental injustice that they create. The DEIS should incorporate assessment of impacts from the Micron-related proposal to expand nuclear energy production in the State.

For all these reasons, the DEIS must expand the assessment of Micron's energy and water demands. Specifically, the DEIS should be revised and expanded to consider the state-wide impacts of Micron's massive electricity demands, the actual shortfall in power likely in future given increasing electricity demands and limited increases in electricity supply in the region and state-wide, and the potential expansion of nuclear power generation in upstate New York to meet the power demands of the Micron project.

**VIII. Additional mitigation measures should be considered to limit the significant adverse impacts that can be anticipated from the construction and operation of this project**

Based on our review of the DEIS, the Nation believes that additional mitigation measures should be incorporated and made enforceable through this process. Our proposed mitigation include greater transparency of process, additional data gathering, greater protection for on-site wildlife from construction processes, additional mitigation for acknowledged GHG impacts, and on-going public engagement in the "adaptive management" of environmental impacts from the project.

First, the DEIS fails to provide concrete data on the types and amount of hazardous materials being used by the Micron project, the quantities and types of hazardous waste generated, and the sites for hazardous waste disposal. In part, the DEIS asserts that this information is not known at this time. This may be an accurate statement, but it does negate the public's right to know what hazardous materials are being used or generated on this site and the risks that those materials pose. This inherent right to know extends beyond the reporting required under the Toxic Release Inventory. The DEIS should require Micron to make detailed information about the hazardous or potentially hazardous materials used on or generated by the site for the life of the project.

Second, Micron should be required to conduct routine and on-going monitoring of the environmental impacts of this project to ensure that the assumptions about impact significance or insignificance can be verified over time. This monitoring should, at minimum, include localized air monitoring, monitoring of waste streams for potential contaminants including the full range of potential PFAS contaminants, monitoring of the

health of the wetlands remaining on site, and on-going monitoring of the threatened or endangered wildlife populations displaced by this site. The DEIS relies heavily on modeling and on assumptions about the effectiveness of pollution controls. Micron should be required to conduct the necessary monitoring to check those assumptions.

Third, the DEIS states that project construction will result in the mass mortality of reptiles, amphibians, and small mammals with limited mobility. DEIS, pp. 3-118 to 3-119. There is no consideration of mitigation methods to limit or avoid this damage. Micron should be required to develop a construction mitigation plan focused on options such as fencing, appropriately timed construction, and even relocation efforts to reduce these wildlife impacts.

Fourth, given that the availability of renewably generated electricity is critical to Micron's GHG-related mitigation proposals and that New York State is struggling to meet its renewable energy goals, Micron should be required to take steps to increase the amount of renewable power available. This could take the form of building additional on- or off-campus renewable energy generation projects or subsidizing off-campus renewable energy projects. At minimum, Micron should be required to generate or subsidize the generation of sufficient renewable energy to offset its power demands.

Last, the Micron project will take more than 15 years to build and will involve complex and evolving technology. The project admittedly includes many uncertain environmental impacts. As noted above and in the DEIS, the type and amount of PFAS discharges in wastewater; the level of control achievable from available PFAS control technology; the actual regional levels of most criteria air pollutants; the likely air emissions from the facility, particularly in terms of upsets and exceedances; the success of wetlands, bat, and bird mitigation projects; and the induced growth effects are all discussed in generalities because the specifics are unclear. Because of the inherent uncertainty surrounding these and other impacts, Micron has committed to adaptive management for issues such as managing groundwater and stormwater run-off on-site wetlands, and flood response.

Given the inherent uncertainties and evolving nature of this enormous and long-term project, Micron should be required to create and support a community advisory and oversight committee which can help with on-going monitoring, environmental impacts assessment and response, and community engagement. This committee should be composed of both community members and local experts who can provide grounded information for use in and review of any continuing assessment and adaptive management at the site as well as a direct line of communication with the affected public. If the DEIS cannot be made more specific now, the community should have a formal role and be directly involved in the review of the specific data on environmental impacts as it is developed over time.

**Conclusion:**

The Onondaga Nation takes seriously its obligations to act as steward for the natural world within its traditional territory and beyond. For all the reasons described above, the Nation believes that the proposed Micron project will have significant impacts beyond those described in the DEIS and that this analysis should be expanded to provide a more careful and detailed assessment of these impacts. In addition, Micron should be required to undertake additional mitigation to better track and potentially reduce its environmental impacts and to engage the community on an on-going basis.

Sincerely,

A handwritten signature in black ink, appearing to read "Alma L. Lowry". The signature is fluid and cursive, with a long horizontal stroke at the end.

Alma L. Lowry, Of Counsel

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**From:** Avni Pravin-Buck <avni@agreeny.org>  
**Sent:** Monday, August 11, 2025 5:02 PM  
**To:** chipsnepa@chips.gov  
**Cc:** Tim Judson; Jessica Azulay  
**Subject:** [EXTERNAL] AGREE and NIRS comment on the June 27, 2025 DEIS for Micron - EISX-006-55-CPO-001  
**Attachments:** Micron-DEIS-comment\_AGREE-NIRS.pdf

Dear Mr. Petrovich,

Please see attached Alliance for a Green Economy and Nuclear Information Resource Service's comments on the June 27, 2025 Draft Environmental Impact Statement (DEIS) for the Micron Semiconductor Manufacturing Project ("Micron Plant") to be constructed in Clay, NY (EISX-006-55-CPO-001).

We appreciate this opportunity to offer our feedback; please don't hesitate to reach out with questions or need for clarification.

Respectfully,  
Avni Pravin-Buck

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**Avni Pravin-Buck** | Deputy Director  
Alliance for a Green Economy  
929-532-1715  
[avni@agreeny.org](mailto:avni@agreeny.org)

August 11, 2025

Robert Petrovich  
Onondaga County Industrial Development Agency  
ATTN: Micron Project  
335 Montgomery Street, 2nd Floor  
Syracuse, NY 13202

Re: EISX-006-55-CPO-001

*[Submitted electronically to chipsnepa@chips.gov]*

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Alliance for a Green Economy and Nuclear Information and Resource Service appreciate the opportunity to comment on the June 27, 2025 Draft Environmental Impact Statement (DEIS) for the Micron Semiconductor Manufacturing Project (“Micron Plant”) to be constructed in Clay, NY (EISX-006-55-CPO-001).

Alliance for a Green Economy (AGREE) is a non-profit headquartered in Syracuse, New York, founded 12 years ago for the purpose of transitioning New York to 100% healthy, safe, and clean renewable energy, based on the principles of economic, social, and ecological justice.

Nuclear Information and Resource Service (NIRS) is a nonprofit organization founded in 1978 to be a national information and education center for impacted communities and the public concerned about nuclear power, radioactive waste, radioactivity, and sustainable energy issues. We provide policy analysis and informational resources on energy and radioactive waste, and monitor policy developments and industrial trends on the national and state levels.

This comment focuses on the environmental impacts of the proposed Micron Plant’s energy consumption and the energy infrastructure that it will require. AGREE and NIRS also share the concerns of other parties that have commented on numerous other environmental, social, and economic impacts that the Micron Plant would have, and which are inadequately addressed in the DEIS. We endorse and incorporate by reference the comments filed by the following parties:

- the Onondaga Nation, American Indian Law Alliance, and Haudenosaunee Environmental Task Force;
- Climate Change Awareness and Action, Inc.;
- Greening USA;
- Jobs to Move America;
- Sierra Club;
- Urban Jobs Task Force.

According to the DEIS, the Micron Plant would add 15,674 gigawatt-hours (GWh) of electricity consumption to the New York Independent System Operator (NYISO) transmission system, more than 10% of statewide electricity consumption in 2024 (151,556 GWh).<sup>1</sup> The DEIS also indicates that the Micron Plant will consume 9.7 billion cubic feet (bcf) of natural gas (hereafter, fossil gas) each year, approximately 0.7% of statewide fossil gas consumption in 2022.<sup>2</sup> Due to the phased construction of the Micron Plant’s four fabrication facilities (fabs), the DEIS indicates that energy consumption will increase incrementally with the operation of each fab:

| <b>Increment (year operational)</b> | <b>Total Electricity (GWh/year)</b> | <b>Incremental Electricity (GWh/year)</b> | <b>Generation Capacity Required (MW)</b> | <b>Fossil Gas Combustion (billion cubic feet/year)</b> | <b>Incremental Fossil Gas (bcf/year)</b> |
|-------------------------------------|-------------------------------------|-------------------------------------------|------------------------------------------|--------------------------------------------------------|------------------------------------------|
| Fab 1 (2029)                        | 3,261                               | 3,261                                     | 480                                      | 2.17                                                   | 2.17                                     |
| Fab 2 (2030)                        | 6,925                               | 3,664                                     | 576                                      | 4.34                                                   | 2.17                                     |
| Fab 3 (2035)                        | 11,042                              | 4,117                                     | 626                                      | 6.51                                                   | 2.17                                     |
| Fab 4 (2041)                        | 15,674                              | 4,632                                     | 704                                      | 9.7                                                    | 3.2                                      |

The scale of the Micron facility’s impacts would affect the entire NYISO grid. This one facility would add electricity loads amounting to more than 10% of current statewide consumption. NYISO transmission Zone C, in which the Micron facility would be located, is currently and historically the largest net generator of electricity, supplying the NYISO grid with more than 16.8 million MWh of electricity in 2024. Typically, electricity demand in Zone C is the third- or fourth-greatest in NYISO, but the addition of the Micron facility could easily elevate it to the second-largest.

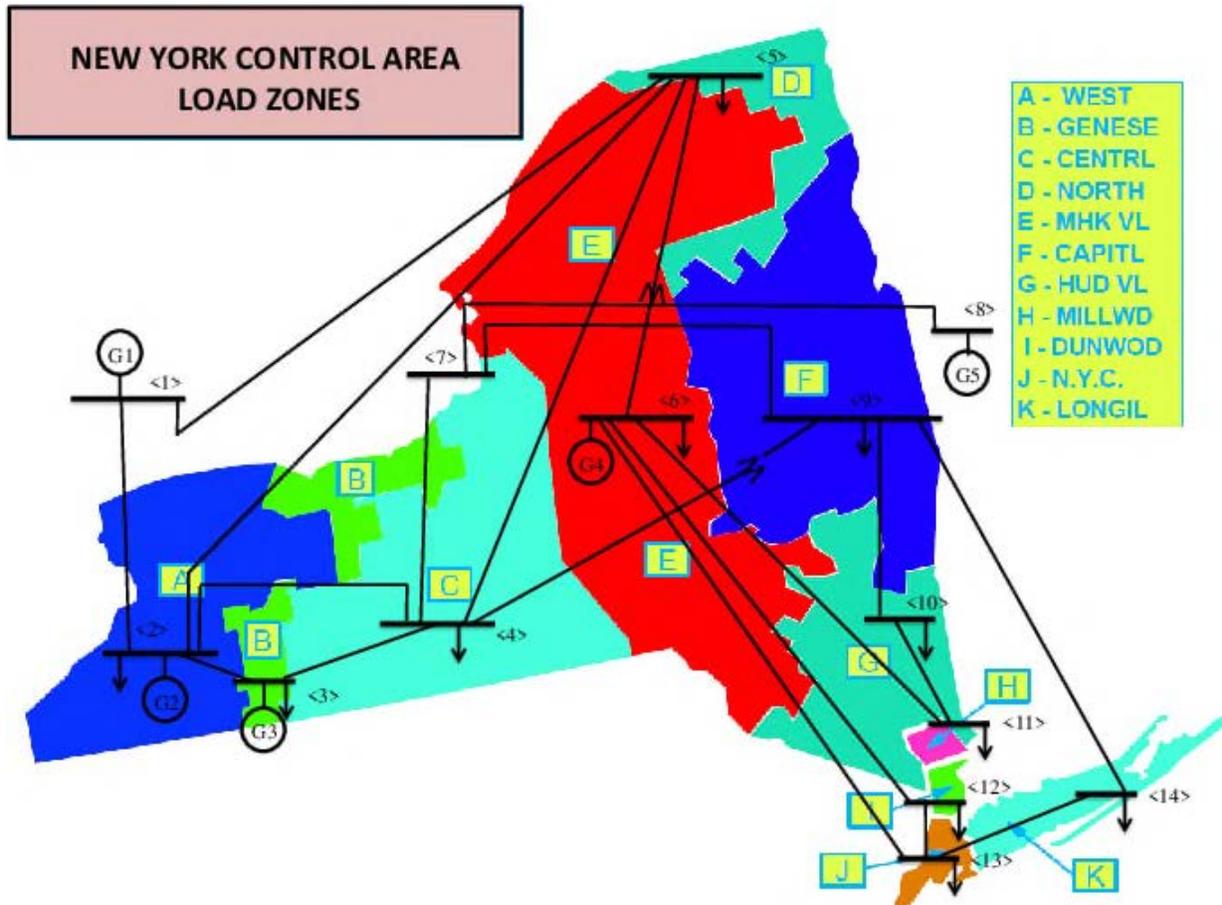
The DEIS correctly identifies that the Micron Plant’s loads could exceed the current amount of net electricity generation in the region of the New York State electricity transmission and delivery system (referred to as the New York Control Area (NYCA), hereafter, the NY Grid) in which the plant is to be built. The Micron Plant’s operations would, in effect, turn NYISO Load Zone C from the largest net exporting region of the NY Grid to a net-importing zone; at the very least, net generation in Load Zone C would be dramatically reduced, affecting statewide

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<sup>1</sup> New York State Energy Research and Development Authority (NYSERDA), *Patterns and Trends - New York State Energy Profile*, December 2024, see <https://www.nyserd.org/-/media/Project/Nyserda/Files/Publications/Energy-Analysis/EEAPT2024-3NY S-Energy-Profileacc.pdf>, accessed August 6, 2025.

<sup>2</sup> Ibid.

electricity transmission. In eight of the last nine years, Load Zone C has been the largest net exporting zone; and since the Indian Point Nuclear Power Plant was phased out in 2020-2021, Load Zone C has become the only zone with sufficient net generation to support the large needs for imported power in the Downstate region.



The DEIS also goes on to state that there could be other significant sources of new electricity demand that result from the Micron Plant’s operations, which would accelerate and exacerbate net electricity reductions in NYISO Load Zone C:

“Induced growth throughout the five-county region would be anticipated to increase electricity demand in addition to the increased electricity demand associated with the Preferred Action Alternative. This would include additional demand generated from potential supply chain operations that may be located in close proximity to the Proposed Project as well as increased residential development. Although it cannot be predicted exactly when, or to what degree, the increased electricity demand from induced growth would occur, it is anticipated that the additional demand would expedite the time in which Load Zone C’s current generation capacity is exhausted.”<sup>3</sup>

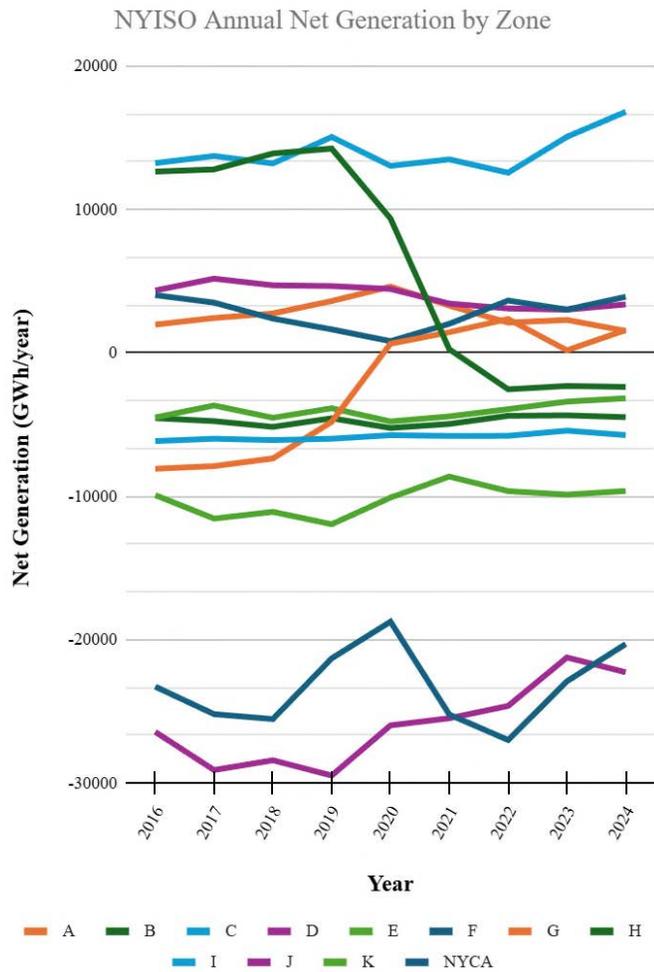
<sup>3</sup> DEIS at 3-270 (p. 384 of 719).

As discussed in greater detail below, the addition of the Micron Plant’s load would fundamentally change Load Zone C, the role it plays within the NY Grid, and the way the flows of electricity will have to be managed statewide. This has significant implications for electricity costs, service quality, and infrastructure not only in Load Zone C and the Syracuse metropolitan area, but statewide. However, the DEIS fails to even scratch the surface of those impacts, and inappropriately dismisses the potential for adverse consequences by placing responsibility on conventional energy system planning procedures:

“However, this effect would be adverse only if the NYISO and National Grid planning processes fail to ensure that additional generation capacity is adequate to support total electricity demand projected in Load Zone C and the remainder of the State when needed, whether in 2041 or earlier. The comprehensive State and utility planning processes would be anticipated to adequately prepare for the future electricity demands associated with the Proposed Project, along with the future electricity demands in the State. Based on this long-term planning capacity, the Preferred Action Alternative would result in significant, but not adverse, effects on electricity demand and transmission resources.”<sup>4</sup>

That assertion is a fundamental misrepresentation of the NY Grid and the impacts that the Micron Plant would have upon it. It appears to rest upon a viewpoint that Micron is entitled to exhaust all of the net generation capacity from Load Zone C that is currently supporting electricity reliability statewide for the operations of the Micron Plant, and it assumes that doing so would only impose an impact on the grid once the Micron Plant’s electricity consumption exceeds net generation in the zone.

<sup>4</sup> DEIS at 3-271 (p.385 of 719), emphasis added.



Highly concentrated electricity demand in regions of the grid with insufficient local generation supply and constrained transmission capacity are known as “load pockets.” New York City (NYISO Load Zone J) and Long Island (Load Zone K) have long been categorized as load pockets in the NY Grid: as illustrated in the chart above, each is characterized by significant net generation deficits, with high concentrations of demand, insufficient local generation supply, and limited transmission interconnection capacity for imported power. In order to maintain reliability of the electricity system, load pockets require significant investment in infrastructure and generation capacity. Market prices for electricity, capacity, and other grid reliability services also tend to be significantly higher in load pockets, due to large demand and constrained supply, placing cost burdens upon consumers and local economies, and potential inequities, depending on how costs are allocated across ratepayer classes.

Even regions near load pockets can suffer high electricity rates due to higher commodity and system charges. For instance, in 2014, NYISO instituted a new Lower Hudson Valley capacity market zone (incorporating Load Zones G, H, and I with Zone J) to incentivize increases in generation and transmission capacity in the Lower Hudson Valley region north of NYC.<sup>5</sup> The NYC and Long Island load pockets (Zones J and K) already had their own capacity market zones, and Zones F-I together produced net-positive generation supply at the time. Due to persistent transmission system constraints between Zones A-E (“upstate”) and Zones F-J (“downstate”), NYISO found that it was necessary to incentivize additional investments in transmission and generation capacity in the Lower Hudson region, south of the upstate-downstate transmission constraint and closest to NYC.<sup>6</sup> Creation of the LHV capacity zone had the effect of increasing capacity market charges to consumers in Zones G-I due to their proximity to the Zone J load pocket.

By information and belief, there is, in fact, no precedent for a single facility consuming as much electricity on the NY Grid as the Micron Plant: occupying less than two square miles of land, the plant would consume as much electricity as the states of New Hampshire and Vermont combined (18,856 square miles and over 2 million residents); or nearly one-third of the electricity consumed by New York City (472 square miles and 8.5 million residents). The addition of the Micron Plant’s loads would create the conditions for a load pocket by virtue of its size and concentration, notwithstanding its location in proximity to a large electricity substation with direct connection to large generation sources. The substantial enlargement of the substation

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<sup>5</sup> Power Management, “NYISO Announces New Capacity Zone,” May 7, 2014, see <https://www.powermgt.com/nyiso-announces-new-capacity-zone/>, accessed August 9, 2025.

<sup>6</sup> Troutman Pepper Locke, “Second Circuit Upholds FERC’s NYISO Capacity Zone Order,” April 14, 2015, see <https://www.troutmanenergyreport.com/2015/04/second-circuit-upholds-fercs-nyiso-capacity-zone-order/>, accessed August 9, 2025.

which National Grid and Micron are now planning is evidence that existing transmission infrastructure is insufficient to accommodate the plant's loads.

The need for substantial increases in generation capacity throughout the region and statewide does require comprehensive planning. As we have seen with NYISO's institution of the Lower Hudson Valley capacity zone over a decade ago, planning processes do not mean the economic and social impacts will be fully mitigated. In fact, residents living in the Hudson Valley capacity zone saw both increased electricity prices and the siting of polluting electricity generating facilities in their communities as a result of the new load zone.

The Syracuse Metropolitan Area could become a new load pocket, due to both the load growth auxiliary to the Micron Plant described in the DEIS and already anticipated increases in electricity demand necessitated by the electrification of buildings, transportation, and industrial facilities. However, even if the region does not end up meeting the conditions of a load pocket, NYISO may decide to institute new capacity zones or other market mechanisms in an effort to drive investment in transmission and generation capacity into the area. System planning to supply and integrate enormous, geographically concentrated demands for electricity in the Syracuse region—of which the Micron Plant will constitute by far the largest share and the single greatest driver—will be necessary, and it will have foreseeable impacts on electricity rates and related environmental impacts.

Other parts of the state could be similarly impacted. If Zone C stops exporting as much electricity to downstate NY, additional capacity zones or other mechanisms may be necessary in other zones, which could drive up electricity prices there and/or incentivize additional polluting energy generation.

There are also reasonably foreseeable factors that could exacerbate all of these impacts, such as unplanned retirements of existing generation sources in Zone C, which are ignored in the DEIS but must be evaluated. The analysis provided in the DEIS assumes that existing generation levels in Load Zone C remain in place, effectively decades into the future. This is a non-conservative assumption. The vast majority of generation in Zone C is provided by three large nuclear reactors in Oswego County: Nine Mile Point unit 1 (621 MW), Nine Mile Point unit 2 (1,311 MW), and James A. FitzPatrick (838 MW). Nine Mile Point unit 1 (NMP1) is already the oldest operating reactor in the U.S., and the second-oldest in the world. Its current operating license expires in 2029. Constellation plans to seek a second 20-year extension of the operating license in 2026. Similarly, FitzPatrick's current license extension expires in 2035, when Fab 3 of the Micron Plant is projected to begin operation, and it would have to be extended under the modeling upon which the DEIS relies.

Even so, a license extension is no guarantee that a nuclear reactor will continue operating. Since 2013, a total of ten reactors which had received license extensions have retired, all of them long before a 20-year extension would have expired. For instance, the Vermont Yankee reactor entered the period of a 20-year license extension in 2012, but its owner retired the plant in 2014; and the Kewaunee reactor was retired in May 2013, even before entering the period of its 20-year extended license. Together, NMP1 and FitzPatrick generate around 12,000 GWh of electricity per year at their current performance levels—about as much as Fabs 1-3 would require in 2035. The retirement of either or both reactors could accelerate and exacerbate the loss of net generation in Load Zone C well beyond the status quo scenario relied upon in the DEIS. While existing generation sources are expected to be retired and replaced in NYS in the coming decades, the Micron Plant’s operations could greatly exacerbate the conditions in Load Zone C for many years into the future.

For instance, the New York Department of Public Service (DPS) recently submitted a proposal to extend a subsidy program that has economically propped up the otherwise uneconomical nuclear power plants in Load Zones B and C since 2017.<sup>7</sup> Under the DPS proposal, the Tier 3 Zero-Emissions Credit (ZEC) program would be extended a full twenty years, from 2029 to 2049, to accommodate license extensions of NMP1 and the Ginna reactor in Zone B. Under the base prices of ZECs proposed by DPS, the cost of the ZEC program would be up to \$33 billion over 20 years,<sup>8</sup> raising electricity rates across all of New York. If deemed necessary to assure generation supply for the enormous load growth in Zone C, the cost of the extension would be at least partially attributable to the Micron Plant. DPS notes that the prices of ZECs may be mitigated by increases in market electricity prices: “Based on Staff’s current forecasts of energy and capacity revenues, the actual ZEC prices could be less than half of the maximum ZEC prices over the full period.” But this lower ZEC cost only comes about if electricity prices in NYISO Zone A (Western New York) rise higher than \$39/MWh, which DPS correlates to a baseline market price of \$33/MWh in Zone C. That would mean DPS forecasts energy and capacity prices \$18-\$41/MWh higher than the modeled Zone C baseline. If DPS’s market forecasts are due to the Micron Plant’s contributions to load growth and loss of net generation in Zone C, the effect will be the same: increased electricity costs in Western New York and possibly throughout the Syracuse Metro Area, Zone C, the wider region, and statewide. The DEIS must address the socioeconomic impacts of electricity price increases which the Micron Plant may induce.

Electric bill hikes can have a number of negative impacts on households, including but not limited to: inability to purchase groceries or necessary medicine; inability to heat or cool home to

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<sup>7</sup> New York Department of Public Service, “Department of Public Service Staff Zero Emissions Credit Extension Proposal,” July 31, 2025, see <https://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId={20FE6198-0000-CF2B-A36D-8B6869CF6E5E}>, accessed August 10, 2025.

<sup>8</sup> *Ibid.* See page 30. Calculated by multiplying the Maximum ZEC Price values in Table 3 and the ZEC cap of 27,618,000 MWh per year (“the overall MWh cap that represents the verifiable historic contributions of the facilities”), over the 20-year period of the proposal.

a liveable, comfortable temperature, inducing thermal stress; health impacts resulting from thermal stress such as exacerbated impacts from asthma, COPD, and other respiratory disorders; inability or reluctance to use necessary medical devices that require electricity; and possible death during extreme weather events. The impact of increasing electric rates is especially felt in low-income households, who spend a disproportionately higher share of their income on utilities due to residing in older housing stock that is often less energy efficient and in need of more insulation, maintenance or repairs.

New York State is already facing a bill arrears crisis. As of June 2025, over 1.1 million households are currently in debt to their utility, and more than 421,287 are at risk of shut offs. Shutoffs themselves carry a number of harmful impacts to households, a disruption to medical treatments, the ability to attend school or work, and ultimately employment stability. A lack of home stability also impacts local employers who rely on their workers, leading to loss of business from inadequate staffing. This is not the only economic ripple effect from high electricity bills for residential households. The reduction in disposable income impacts local spending and disproportionately affects small businesses. The DEIS must consider both the direct impacts on households from increased electric bills, as well as the indirect impacts on the wider Central New York economy from greater financial stress on residents in order to fully mitigate harms caused by the Micron facility.

The DEIS describes the distribution system infrastructure necessary for the plant to access electricity from the NY Grid, namely: the expansion of a substation nearby the the Micron Plant site and the installation of eight 345 kV power lines to connect the fabs to the substation, the subject of a Joint Proposal before New York Public Service Commission (PSC).<sup>9</sup> As NIRS, AGREE, and others have commented on the Joint Proposal, its limited scope provides woefully little detail as to how the Micron Plant’s new loads will be addressed and the essential questions they raise:

- What generation sources will supply the 100% renewable energy referred to in the joint proposal?
- Where will those generation sources be located?
- How will that generation be delivered to National Grid’s Caughdenoy Road substation, and will additional transmission capacity and other infrastructure be required to do so?
- What will be the environmental and electricity rate impacts of those generation sources and grid infrastructure?

The DEIS equally fails to provide clarity on how the immense energy needs of the Micron Plant will be addressed, the full scope of environmental and socioeconomic impacts they will have, and how those impacts could be mitigated.

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<sup>9</sup> New York Public Service Commission, “Notice of Joint Proposal and Opportunity for Public Comment,” February 15, 2025, see <https://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId={C08F4D95-0000-CF14-85E7-E8A0FBFC74E1}>, accessed August 10, 2025.

## **New York Energy Requirements**

The DEIS recognizes that New York State laws and regulations establish legally binding statewide targets for emissions reductions, electricity generation sources, and passenger vehicles. However, it misrepresents the specifics of those requirements and fails to evaluate their full implications for the Micron Plant and its environmental and socioeconomic impacts. There are three operative laws and regulations that apply to the Micron Plant's energy requirements:

- the Climate Leadership and Community Protection Act (CLCPA), which establishes statewide targets for electricity supply, greenhouse gas emissions, energy efficiency, passenger vehicles, and other policy measures for achieving statewide emissions reductions;
- the Clean Energy Standard (CES), the PSC program through which the CLCPA's statewide electricity supply targets are being implemented;
- the New York Green CHIPS Act, which establishes binding eligibility requirements for semiconductor manufacturing facilities that seek state financial incentives, including an approved sustainability plan that must include procurement of renewable energy for 100% of facilities' electricity demand and, if needed, hydrogen produced through electrolysis powered by renewable energy.

The CLCPA and CES contain a degree of flexibility regarding the sourcing of electricity generation. They establish a target of 70% renewable energy by 2030 and a target of 100% zero-emissions electricity by 2040. The latter target allows for use of electricity from non-renewable sources that meet the state's standard for zero-emissions generation, such as nuclear energy. However, the Green CHIPS program does not, specifying that projects must procure 100% *renewable* energy and provide detailed descriptions of how that will be achieved. The Green CHIPS Sustainability Plan Template contains the following instructions and guidance:

### **“1. Electricity**

Green CHIPS participants will be required to utilize 100% energy generated from renewable energy systems, as defined in section 66-p of the New York Public Service Law, for electricity in their operations and maintain the 100% level of renewable energy for electricity supply for the duration of the project.

“Renewable energy systems” are defined as systems that generate electricity or thermal energy through use of the following technologies: solar thermal, photovoltaics, on land and offshore wind, hydroelectric, geothermal electric, geothermal ground source heat, tidal energy, wave energy, ocean thermal, and fuel cells which do not utilize a fossil fuel resource in the process of generating electricity.

a) Discuss how your project will meet these requirements? Specific actions may include, but need not be limited to, direct renewable energy project investments, renewable project offtake or power purchase agreements, procurement of renewable energy credits, and onsite renewable energy installations – all with appropriate claims of ownership of environmental attributes.

b) If applicable, discuss any additional measures beyond these requirements that you plan to undertake. ESD encourages applicants to include additional commitments such as, but not limited to, plans to prioritize in-state sources of renewable energy, the installation of on-site renewable energy systems and on-site battery storage systems, support for community solar or similar local clean energy projects, and 24/7 or other time matching-based renewable purchase commitments.<sup>10</sup> (emphasis added)

The DEIS refers to the Green CHIPS program as imposing sustainability requirements, but only in generalities:

“... New York’s Green CHIPS Excelsior Jobs Tax Credit Program provides certain semiconductor manufacturer tax incentives .... To receive benefits from this tax credit program, a project must ... include sustainability measures to mitigate the project’s greenhouse gas emissions over its lifetime. ...”<sup>11</sup>

“The State and local land use and economic development policies relevant to activities in the land use study area include ... the New York State Green CHIPS Program. Appendix D-3 includes detailed summaries of these policies.<sup>12</sup>

“The Proposed Project would be consistent with the Onondaga County Comprehensive Plan, the SMTC 2050 Long Range Transportation Plan 2020 Update, the Town of Clay Northern Land Use Study, the draft Town of Cicero Comprehensive Plan, and the New York Green CHIPS Program, fulfilling several of their goals relating to economic development and industrial use of the WPCP.”<sup>13</sup>

“The Proposed Project would be consistent with the Onondaga County Comprehensive Plan, the SMTC 2050 Long Range Transportation Plan 2020 Update, the Town of Clay Northern Land Use Study, the draft Town of Cicero Comprehensive Plan, and the New

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<sup>10</sup> Empire State Development, “Green CHIPS Sustainability Plan Template,” see [https://esd.ny.gov/sites/default/files/Green-CHIPS-Sustainability-Plan-Template\\_0.pdf](https://esd.ny.gov/sites/default/files/Green-CHIPS-Sustainability-Plan-Template_0.pdf), accessed August 8, 2025.

<sup>11</sup> DEIS at pp. 1-1 to 1-2 (pp. 48-49 of 719).

<sup>12</sup> Ibid at p. 3-22 (p. 136 of 719).

<sup>13</sup> Ibid at p. 3-520 (p. 634 of 719).

York Green CHIPS Program, fulfilling several of their goals relating to economic development and industrial use of the WPCP.”<sup>14</sup>

“Projects also must adopt sustainability measures to mitigate greenhouse gas emissions ... To be eligible to receive Green CHIPS Program incentives, Micron must meet the statutory requirements of creating at least 500 new jobs, adopting sustainability measures to reduce GHG emissions (see Section 3.7, Greenhouse Gas Emissions, Climate Change, and Climate Resiliency), paying construction workers the Federal prevailing wage, and committing to worker and community investments. In furtherance of the Green CHIPS Program and New York’s policy of incentivizing semiconductor manufacturing in New York, in September 2022, Micron, ESD, Onondaga County and OCIDA entered into a “Key Terms and Conditions for Development of the Micron Green Manufacturing Memory Chip Fab Campus in Clay, New York” (“Term Sheet”) to incentivize Micron to locate a semiconductor facility at the WPCP.

The Term Sheet outlines Micron’s commitments to creating more than 9,000 new jobs and paying the Federal prevailing wage to construction workers, and further outlines preliminary sustainability commitments designed to reduce GHG emissions. The Term Sheet further illustrates Micron’s commitments to worker and community investments, including a Community Investment Fund (CIF) of \$500 million for CNY communities, which will be used to develop the local workforce, invest in education throughout CNY, promote affordable housing, and provide additional benefits to CNY communities. Micron also committed to installing on-site renewable energy systems and implementing water conservation and efficiency measures.”<sup>15</sup>

The DEIS omits the specifics commitments Micron has made to ESD and OCIDA under the New York Green CHIPS program, which include procurement of 100% renewable energy by 2025 and throughout the duration of the project:

“Section 14 SUSTAINABILITY REQUIREMENTS

33. The Parties agree that leading-edge sustainability commitments designed to mitigate greenhouse gas ("GHG") emissions and other environmental impacts are vital to the success of the Fab Complex and will negotiate a Clean Energy and Sustainability Action Plan ("CESAP"), subject to the requirements of Excelsior Jobs Program Green CHIPS incentives and approval by ESD, that will strive for the highest standards practicable and that, at a minimum, shall require Micron to:

- a. Utilize 100% renewable energy for electricity by 2025 in its New York Fab Complex operations, which may include but not necessarily be limited to the use

<sup>14</sup> Ibid at p. 3-520 (p. 634 of 719).

<sup>15</sup> DEIS, Appendix D at pp. D-16 to D-17 (pp. 195-196 of 205).

of renewable energy credits, and maintain that 100% renewable energy for electricity supply for the duration of the Term. In fulfilling this commitment, Micron shall prioritize in-state sources of renewable energy to the extent they are available, cost-effective, compatible with Micron's corporate renewable energy definition and in alignment with New York State's Clean Energy Standard. ...

f. Where feasible and cost effective (i) utilize green hydrogen (hydrogen formed through electrolysis powered by renewable electricity, without greenhouse gas emissions) to displace/replace natural gas and gray hydrogen consumption; (ii) support /participate in New York's federal Hydrogen Hub proposal; and (iii) pursue other clean measures such as geothermal heat pumps for space heating and cooling loads;

g. Adopt other mitigation measures for GHG process emissions where practicable;

h. Commit to infrastructure for charging/fueling clean vehicles for employee, contractor, and Micron fleet use.”<sup>16</sup> (emphasis added)

In short, under the New York Green CHIPS program, Micron has committed to: procure 100% renewable electricity for the Micron Plant’s operations by 2025 and for the 20-year duration of the agreement; to prioritize renewable energy sources located in New York State; to utilize “green hydrogen” to the extent feasible; to pursue use of other clean technologies for space heating and cooling; and to incorporate clean vehicle charging/fueling infrastructure for employees, contractors, and Micron vehicles.

However, the DEIS’s description of Micron’s commitments to the energy supply for the plant’s operations does not reflect the specificity of the legal and contractual requirements of the project as detailed in the Term Sheet which it cites:

“Although Micron has committed to controlling direct GHG emissions to the maximum extent practicable, the Preferred Action Alternative would result in significant adverse effects on climate change. Micron would commit to purchasing 100% carbon-free electricity utilizing power purchase agreements and renewable energy credits (RECs). NYSDEC will be reviewing Micron’s Climate Leadership and Community Protection Act (CLCPA) analysis for consistency with New York State’s ability to meet its statewide GHG emission limits. NYSDEC may require additional climate-related mitigation measures under the CLCPA.” p. 0-9 (p. 38 of 719)

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<sup>16</sup> Empire State Development, “Key Terms And Conditions For Development Of The Micron Green Manufacturing Memory Chip Fab Campus In Clay, New York (‘Term Sheet’),” September 22, 2022, <https://esd.ny.gov/sites/default/files/Micron-Term-Sheet-Fully-Executed.pdf>, accessed August 9, 2025.

Furthermore, the DEIS cites Micron’s plan to procure a substantial amount of fossil fuel generation through the New York Power Authority’s (NYPA) ReCharge New York and High Load Factor Power programs:

“Further, the NYPA has awarded Micron a power allocation through the ReCharge NY program to meet the Proposed Project’s short-term electricity requirements. The ReCharge NY program provides qualified companies with seven-year contracts for NYPA power in exchange for certain job and economic commitments in New York State. Micron’s initial ReCharge NY allocation consists of 140,000 kW (or 1,226 GWh), 50 percent of which is NYPA hydropower. In addition to the ReCharge NY allocation, Micron also has been approved for a 404,000 kW (or 3,539 GWh) High Load Factor (HLF) allocation for ten years. The ReCharge NY and HLF allocations would likely come from sources outside of Load Zone C. The HLF allocation is provided to energy-intensive industries and is sourced from the market. Based on the current spare capacity in Load Zone C and these additional allocations, even without new generation, existing grid capacity would be estimated to adequately supply the Proposed Project’s needs through 2030, during construction and interconnection of Fabs 1 and 2.” p. 3-270 (p. 384 of 719)

Neither of these NYPA power programs provides 100% renewable energy:

- ReCharge NY provides 50% hydropower and 50% market power, which is predominantly gas-fired generation.<sup>17</sup>
- The High Load Factor program consists of 100% market power.<sup>18</sup>

Of these NYPA power allocations, only 613 GWh is verifiably comprised of renewable energy, as defined in NYS law and regulations – less than 10% of Micron’s projected Phase 1 annual electricity consumption.

Further, the allocation of 613 GWh of hydropower from NYPA’s existing generation facilities does not mitigate Micron’s addition of 613 GWh of load to the NY Grid. NYPA’s hydropower generation is currently serving existing NY Grid loads. Therefore, regardless of Micron’s contractual relationship with NYPA to pay for an allocation of its existing renewable generation, the addition of Micron’s load to the grid will require additions of generation from other sources to supply the grid statewide. Unless the sources of that generation are new renewable energy sources and/or energy efficiency/conservation measures that verifiably reduce existing loads (e.g., residential and commercial building energy efficiency programs), then incremental

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<sup>17</sup> New York Power Authority, “ReCharge NY,” 2025, see <https://www.nypa.gov/services/incentives-and-grants/recharge-ny>, accessed August 10, 2025.

<sup>18</sup> NYPA, “2024 Report to the Governor and Legislative Leaders on Power Programs for Economic Development,” April 2025, see <https://www.nypa.gov/-/media/nypa/documents/document-library/governance/2024-report-to-governor-and-legislative-leaders-on-power-programs-for-economic-development.pdf>, accessed August 10, 2025.

generation is likely to be provided by existing fossil fuel generation sources operating at higher capacity factors. Merely purchasing power from existing renewable energy sources, or purchasing renewable energy credits (RECs) from existing or new sources whose power is being procured by other consumers separately from the associated RECs, does not mitigate the emissions impact of new large loads like those of the Micron Plant.

### **DEIS Emissions Impacts of Energy**

The DEIS conservatively estimates the emissions impacts of energy to power the Micron Plant's operations by assuming it will be provided from fossil fuel generation sources:

“While the specific breakdown of Micron's electricity consumption is provided in Chapter 3.10, Utilities and Infrastructure, it is assumed for this analysis that all electricity is fueled by offsite fossil fuel generated power as a worst-case scenario.”

However, the projected emissions from power generation appear to be vastly underestimated. The DEIS projects two values for the Micron Plant's greenhouse gas emissions, based on two methodologies for projecting the climate impacts of those emissions:

- 2,393,850 metric tons per year, based on the 20-year global warming potential (GWP20) of the projected emissions.
- 2,274,089 metric tons per year, based on the 100-year global warming potential (GWP100).

These estimates appear to vastly underestimate the emissions impacts of the Micron Plant's electricity consumption. At 15,673.83 GWh/year, the emissions projections in the DEIS equate to rates of 152.7 metric tons/GWh (GWP20) and 145.1 metric tons/GWh (GWP100). This is far lower than the rates used by the U.S. Energy Information Administration (EIA) to compute the average CO<sub>2</sub> emissions of fossil fuel generation sources. EIA utilizes a rate of 437 metric tons of CO<sub>2</sub> per GWh for fossil gas generation.<sup>19</sup> At that emissions rate, greenhouse gas emissions from electricity generation to supply the Micron Plant's annual power use (15,673.83 GWh) would be at least 6,855,976 metric tons, approximately three times the amount reported in the DEIS. Furthermore, the DEIS does not appear to include other known sources of GHG emissions from power generation, such as fugitive methane emissions from gas and oil extraction, pipeline leakage, and incomplete combustion.

In order to fully mitigate GHG emissions from the Micron Plant's operations, a large amount of new renewable generation capacity would have to be added to the NY Grid. A representative mix of 50% land-based wind generation and 50% utility-scale solar photovoltaic (PV) generation

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<sup>19</sup> U.S. Energy Information Administration. “Frequently Asked Questions (FAQs): How much carbon dioxide is produced per kilowatt-hour of U.S. electricity generation?,” Last updated: December 11, 2024, see <https://www.eia.gov/tools/faqs/faq.php?id=74&t=11>, accessed August 10, 2025. Per the 2023 data reported: 1,806,063 million kWh of gas generation = 1,806,063 GWh. Emissions of 790 million metric tons (MMT) from that generation yields an average rate of 437.42 metric tons per GWh. At that rate, 15,673.82 GWh of generation would emit 6,855,976 metric tons of CO<sub>2</sub>.

would require at least 7,000 MW of capacity. In addition to the 4 MW of solar PV capacity the DEIS estimates will be installed on-site at the Micron Plant:

- 2,555 MW of land-based wind<sup>20</sup>
- 4,472 MW of utility-scale solar PV<sup>21</sup>

This is substantially more land-based wind and utility-scale solar capacity than is currently installed in New York. NYISO reports there was 2,454 MW of land-based wind generation and 573 MW of utility-scale solar PV on the NY Grid in 2024. Interconnection, transmission, and integration of those generation sources will require substantial infrastructure development, from siting transmission lines and substations to various types of electricity storage systems. Development of such infrastructure would have a range of positive and negative environmental and socioeconomic impacts, from pollution reduction and climate change mitigation to siting and development of land and acquisition of land for transmission right-of-ways (ROWS); from changes to community character and electricity cost allocations to increased employment, property tax revenues, and stronger local economies. However, the DEIS fails to even consider that such impacts may arise from the Micron Plant's operations.

It is possible that the impacts of infrastructure development needed for the Micron Plant could be mitigated by, and benefit from, broader system planning of the kinds referred to in the DEIS. If done deliberately and with due consideration for ratepayer impacts, a proceeding to plan for the expansion of the grid to integrate the Micron facility and loads from electrification of transportation, buildings, and other industrial and commercial uses in the Syracuse metropolitan area and Zone C could identify synergies. For instance, integration of electrical vehicles through bi-directional charging infrastructure could enhance reliability and resilience of electricity supply to Micron and the regional grid. Unfortunately, the DEIS fails to identify the full scope of impacts that the Micron Plant's energy use would entail.

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<sup>20</sup> National Renewable Energy Laboratory (NREL), NREL, "Annual Technology Baseline: Land-Based Wind," updated February 26, 2025, see [https://atb.nrel.gov/electricity/2024/land-based\\_wind](https://atb.nrel.gov/electricity/2024/land-based_wind), accessed August 10, 2025. Estimated land-based wind capacity for 50% of the Micron Plant's electricity calculated conservatively using an average annual capacity factor of 35%, slightly lower than NREL's value for Wind Speed Class 9 resources in the table "Land-Based Wind Resource and Technology Classes."

<sup>21</sup> NREL, "Annual Technology Baseline: Utility-Scale PV," updated July 17, 2023, see [https://atb.nrel.gov/electricity/2023/utility-scale\\_pv](https://atb.nrel.gov/electricity/2023/utility-scale_pv), accessed August 10, 2025. Estimated utility-scale solar PV capacity for 50% of the Micron Plant's electricity calculated conservatively using an average annual capacity factor for single-axis tracking PV installations in NY of 20%, which is less than the figure NREL provides for Resource Class 10 in the table of "Utility-Scale PV Resource Classes."

## Volcko, Mary E.

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**From:** John Przepiora <john@greeningusa.org>  
**Sent:** Monday, August 11, 2025 3:03 PM  
**To:** chipsnepa  
**Cc:** Sustainability Coalition  
**Subject:** [EXTERNAL] Micron Clay NY DEIS Comments by GreeningUSA, Inc.  
**Attachments:** Micron Clay NY DEIS overview and general comments by\_greeningUSA.pdf

On behalf of GreeningUSA, Inc., the Syracuse, NY based not-for-profit organization, and its board of directors, I am submitting the attached pdf with comments on the Micron Clay, NY DEIS. Should there be any reason why you are unable to include these comments in the public record for this action please advise ASAP so that a remedy can be sent; otherwise I will assume that the attached is acceptable for inclusion in the public record for appropriate response and consideration as the Final EIS is issued. Thank you for the opportunity to submit these comments. If you have any questions, please contact me.

John Przepiora  
Syracuse, New York  
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(315) 382-3829  
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*...Advocating for sustainable communities  
to the benefit of local economies and environments.*

**These comments are submitted on behalf of the board of directors for GreeningUSA Inc., a Syracuse, NY membership not-for-profit organization which has advocated for sustainable communities to benefit local economies and the environment over 21 years.** The sustainability principles for which our organization stands are defined in our “Twelve Traits of a Sustainable Community” which can be found at [www.GreeningUSA.org](http://www.GreeningUSA.org). Through the lens of these traits, the proposed Micron development, as described in the DEIS, is fraught with constructs contrary to the principles which our organization promotes. At a time when our environment is afflicted with a growing climate crisis, the quality and quantity of our water and air are being degraded, and economic and social inequities divide the people of our region, a commitment to sustainable development is critical. In our view, development that is sustainable links economic development to environmental protection, and human wellbeing to the cross-generational responsibility to protect and sustain resources for future generations. A somewhat similar notion of the responsibility that nations have was previously set forth in principles enumerated in the 1972, ‘Declaration of the United Nations Conference on the Human Environment’ which asserted that “man has the fundamental right to freedom, equality and adequate conditions of life, in an environment of a quality that permits a life of dignity and well-being, and he bears a solemn responsibility to protect and improve the environment for present as well as future generations.” Simply put, sustainable development is development that meets the needs of the present without compromising the ability of future generations to meet their own needs. Even with a limited time for review of the recently issued DEIS, GreeningUSA has concluded that many aspects of the Micron development project promoted by our Federal, State and County governments are contrary to sound sustainability principles and potentially endanger the health and well-being of the region.

The 719 page DEIS and its 19,000 pages of appendices are not possible for us, or anyone, to review all aspects of the project in the 48 days allowed. Previous requests submitted by others, including GreeningUSA members, for an extension of the public input have not been responded to. While 48 days exceeds the minimum requirement for SEQRA and NEPA, this limited time frame for a complex project is contrary to the spirit of NY’s SEQRA which places high importance on public participation. The DEC’s SEQRA handbook says that ample opportunities for public involvement “allow the public and other agencies to provide input into the planning or review process, resulting in a review with a broader perspective. It also increases the likelihood that the project will be consistent with community values.” ( DEC SEQRA Handbook 4<sup>th</sup> Edition 2020, p.4)

**Two of perhaps the most important traits of a sustainable community are governmental leadership and citizen engagement.** In light of the fact that the proponents of this project, including the County of Onondaga, have spent very little effort to engage citizens in dialog over

this project, cutting the review process short disregards the public's right and responsibility to give informed input on something that will affect our future, and the future of generations to come. Creating obstacles to citizen engagement is contrary to the principles of sustainability.

Major components of the project each deserve public scrutiny of 30 to 45 days. These multi-components, lumped together with this project's overlapping multiple phases, make this DEIS difficult for anyone, including the most intelligent and experienced planning and development expert, to review, understand and respond within 48 days. Please extend the public comment period to at least 120 days, until October 23 to give the public and GreeningUSA a better opportunity to comment and a chance to review additional sections we have been unable to get to.

Based on the environmental impacts found in the DEIS, it is our opinion that this project does not adhere to many principles of sustainability and therefore must not go forward without major changes. We have come to this conclusion after consideration of the following.

**The project will destroy a critical ecological resource by filling and destroying the White Pine wetlands** that serve many useful purposes, which are not thoroughly assessed in the DEIS. An insufficient mitigation plan is proposed. The existing well developed wetland cannot be adequately replaced with the mitigation plan as proposed. Experts we have consulted advise that perhaps even a 7 to 1 replacement strategy may be necessary but that may also be insufficient. We are in the era of climate chaos, with heat disrupting people's lives in profound ways. This site is a sink to not only keep carbon out of the atmosphere, but serves as an air conditioner to cool the surrounding environment and a bathtub to keep flooding in check.

Adding a huge concrete factory and surrounding pavements only adds to the heat island effect exacerbating the adverse impact of having destroyed the wetland and forested site in the first place. Replacement wetlands proposed will not replace the valuable functions of the WPCP wetlands, including heat island mitigating effects, without additional study of heat island effects and inclusion of additional mitigating measures. After assessment of heat island effects using state of the art measurement techniques, heat island mitigation practices must be established, and a program for long term monitoring and adjustment procedures must be established.

**This proposed factory will pollute the air with carbon and other GHG including hazardous chemicals.** Water will also be at risk of being polluted with hazardous, forever chemicals which are unregulated. A GHG mitigation strategy that may need to reach

beyond Micron's campus footprint must be established so that this campus and its induced growth will not make the statewide goals of the NY CLCPA unachievable.

Lacking from the DEIS is an analysis of the social cost of the factory's GHG footprint. Including such an analysis, using methodology such as social cost estimations generated by EPA's peered review interagency modeling (see [EPA Report on the Social Cost of Greenhouse Gases: Estimates Incorporating Recent Scientific Advances](#)), would put into context incremental external costs to the nation which this singular project will contribute. Such an analysis would provide a reference value to consider in a reevaluation of the costs and benefits of the Clay, NY Micron chip fabs, and would be useful for reconsidering the conclusion that 4 four fabs are necessary to provide necessary ROI and the rationale for the preferred alternative proposed.

**The EIS should fully disclose in a comprehensive, easily understood manner all municipal costs to be incurred for expanded municipal services**, external environmental costs which can be anticipated and estimated, and revenue expected to be generated in the form of taxes, fees or other payments. Relatedly we do not see a comprehensive cost benefit analysis for the preferred alternative in the DEIS beyond the results presented in Appendix C prepared by REMI. This analysis fails to account for the environmental costs, including such things as the social cost of GHG emissions. The DEIS also fails to disclose in a comprehensive and easily understood manner the costs which will be incurred by local and state governments in support of this development, including costs of the connected water and wastewater systems or other municipal services, such as police and fire, which are necessary to serve the development, and the induced growth; nor are the revenues to be achieved over time by the taxing and service jurisdictions in the region listed in a manner the public can readily understand.

**Construction activity will impose adverse impacts on the surrounding area for years to come** with noise and traffic, which could make the area an intolerable location in which to live. A local citizens' advisory board must be established to allow local residents to be kept advised of construction activity impacts and allow for input to minimize disruptions impacting local residents. Micron should also develop ways to minimize these impacts including the possibility of reducing the number of fabs to shorten the construction period and lessen related impacts. Micron's refusal to consider a smaller project without transparent justification and analysis of the mitigating effects of a reduced footprint, or shorter construction period is a non-starter. Sustainability requires balance, and this project, with 4 fabs, may be unbalanced for the site selected and the impacts it presents.

If the project's economic development objectives can be achieved with a smaller environmental footprint this project may be more sustainable.

**Once operational the 12,000 car parking lot will impact residents in the surrounding area by attracting increased automobile traffic to the area.** Reducing the footprint for parking and creation of a transportation management plan (TMP) with reliance of mass transit, incentives for workers to utilize transit, and even financial support to create an effective multi-modal transportation system to serve its campus and the regional needs of its workers, would serve to make this project more sustainable than its current configuration and reliance of personal vehicles. A TMP with fewer parking spaces available can have multiple benefits including reduction of paved surfaces and stormwater quantity, improvements to water quality, lower GHG emissions, and less wetland destruction.

**One objective of the development is to solve the region's long standing poverty,** yet there is no assurance that local workers and local residents will reap the benefits purported to be an objective of the project. The DEIS must include clear estimates, if not commitments, of the types of jobs and wages that will be available to local residents. Micron needs to make commitments to a labor peace agreement to allow workers freedom to choose to unionize or not, and a community benefits agreement with firm commitments for local workers, worker health and safety, and programs to assist local and regional residents with rising housing costs that will be induced by the project.

**The projection that workers will immigrate to the region, increasing the population by over 64,000 and 27,000 new households,** flies in the face of the promise of good paying jobs to lift the local residents out of poverty. Micron must strike the correct balance of local and non-local hiring in order to achieve a sustainable project that will actually raise the wealth level of the local residents and reduce the impact of rising housing costs.

**There is no assessment of, nor assurance that rising housing costs will not adversely impact** the city of Syracuse (or other) renters who currently are cost burdened or on fixed incomes; or impact those wishing to build or buy a home only to find home prices and construction costs make that impossible. Gentrification, with attendant displacement and increased homelessness, is a potentially adverse impact which is not sufficiently addressed in the DEIS, and it should be. A public participation effort that places high regard for transparency and public engagement should be established to help manage the risks of gentrification and maximize the utilization of local workers.

The impact of developing an estimated 27,000 new household units is ill assessed in this DEIS. To rely on the hope that future planning and development policies will match the vision of the Onondaga County comprehensive plan for smart growth isn't sufficient. Real planning and commitments are necessary, and I see little of that detailed in this DEIS.

**The carbon footprint of the induced residential and commercial development isn't estimated** in the DEIS; nor any mitigation specified or required. They should be. Relying on existing or unknown future policies isn't acceptable, nor is rushing to get this project going without clear understanding, policies, and plans about how the environmental and economic impacts of the induced growth will serve the community's needs in a sustainable manner.

**A rebalancing of the size of the project and the magnitude of the impacts with a "build, operate and assess" adaptive management** approach may be a way to move forward with caution. Micron claims that the only alternative is to build 4 fabs; that fewer than 4 is uneconomical, robbing them of the needed ROI to make the Clay, NY project viable. This assertion isn't sufficiently supported by evidence particularly when fab projects elsewhere have fewer fabs at one location.

If four fabs are required for WPCP, the approval process should be contingent on an adaptive management incremental phasing sequence to ensure that commitments made are kept, and environmental impacts/costs are manageable in a sustainable manner, before continuing to build out additional fabs.

**The infrastructure expansion of the induced residential and commercial growth isn't estimated** in the DEIS. How many miles of new roads, water lines and sewers will be needed to serve 27,000 new households? How much land is needed to be developed? None of these are presented in the DEIS. We believe they should be, at least at some planning or schematic level of estimation.

**Micron must fund mitigating measures deemed necessary to protect the region from the adverse impacts.** It is unclear that PILOT payments, wages paid, or rising real estate values will offset adverse impacts. Offsets against added municipal services, incentives to assure sufficient affordable housing is available, and payments to offset environmental degradation should all be Micron's and its shareholders' responsibility, not current residents. The DEIS must do a better job of displaying and conveying the facts about the costs and benefits which municipalities and their residents will

experience in a clear concise manner. Using tables to summarize the effects, costs and revenues should help to convey this sort of information in an easily understandable fashion.

**With its many phases and components this project makes the DEIS complex and difficult to comprehend.** NY's SEQRA requires the public to be informed about environmental, economic and social impacts. This DEIS has limitations which need to be corrected in a way the general public can understand. Asking the public to digest 20,000 pages in 48 days isn't a sustainable practice either.

**The Micron project as currently envisioned and described in this DEIS is not an example of sustainable development.** Let's not delude ourselves. While Micron touts itself as a company that values sustainable practices, the Clay, New York project falls short of what is necessary to be a truly sustainable development. Unless the White Pine Commerce Park development is dramatically reimagined, the project on balance cannot be supported by GreeningUSA for reasons mentioned here. We urge that permits not be issued for this project until unsustainable components and practices are sufficiently mitigated.

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**From:** John Przepiora <jwp134@twcny.rr.com>  
**Sent:** Monday, August 11, 2025 9:12 AM  
**To:** CHIPSNEPA@chips.gov  
**Cc:** 'Sustainability Coalition'  
**Subject:** [EXTERNAL] Micron Clay, NY Draft EIS 2025 Comment 1 of John Przepiora  
**Attachments:** Appendix D Land use zoning and public policy comments of John Przepiora.pdf

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The attached pdf document contains my comments on the DEIS issued for the NEPA and NY SEQRA reviews of the proposed Clay, NY Micron Chip Fab project.  
The subject areas included in this attached public comment include: Appendix D, land-use, zoning and public policy.  
Should there be any reason why you are unable to include these comments in the public record for this action, please advise ASAP so that a remedy can be sent; otherwise I will assume that the attached will be accepted and included in the record for appropriate response and consideration as the Final EIS is issued.

John Przepiora  
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## **Appendix D Land use, Zoning and Public Policy**

### **Appendix D3.1 2050 Long Range Transportation Plan 2020 Update**

Section D 3.1 reviews the 2050 long range transportation plan 2020 update of the Syracuse Metropolitan Transportation Council as amended in 2022. My question is: did the 2022 amendment utilize the latest Micron population and household projections that were developed by Remi and Micron's consultant? It is unclear whether such projections were included when SMTC amended its plan to reflect progress on the interstate 81 viaduct project. (See page 190 of the PDF or page D 11.) If the population and household growth projections in the DEIS and the SMTC plan are inconsistent then a revision of the EIS or acknowledgement of such inconsistency should be included in the final EIS.

### **Appendix D3.2 Onondaga County Comprehensive Plan**

Appendix D3.2 discusses Onondaga County's comprehensive plan policy implications. Said plan was adopted in 2023. And the plan calls for a focus on transit oriented development near identified centers and transit corridors; and enhancement of the bus rapid transit system to support the land use vision of the county. However section 3.2.1 states that the proposed Micron project would not directly advance some of the comprehensive plan's goals relating to the development of this key employment center, and that the proposed project would not include improvements to public transit, such as expansion of the bus rapid transit services. The DEIS asserts those actions are intended to be undertaken by the county. Which means there is no commitment that the County land use plan vision will come to fruition. It is my contention that the DEIS and the final environmental impact statement must include more than intentions but include commitments that transit services will support, organize and service the growth which the Micron project will induce, and the trip generation for workers travelling to and from the fabs. Assuming that transit and smart growth will be utilized without commitments, the environmental impact of the proposed project may be understated. The impacts of this project must be described: will there be transit service available to the visitors and employees of the Micron campus? Will parking at the plant be minimized, incentives issued, and service levels enhanced to spur the use of transit and deter personal vehicle travel to and from the factory? And, will the induced growth, both residential and commercial, be accommodated in a transit oriented manner or not?

Section 3.3 further states that the NLUS asserts that New York State Route 31 is currently operating at full capacity and recommends that any proposed future development that would increase the intensity of uses in northern Clay provide "adequate traffic impact." Something seems to be missing in this statement. Perhaps adequate mitigation of traffic impacts should be

written here instead? Of course mitigation measures should be inclusive of the need to incentive alternate means of travel such as transit and bicycle. Separation of bicycles from automobiles and trucks needs to be accomplished by more than just paint: a separate bicycle path must include to enhance safety of cyclists. Safe pedestrian travel must also be designed into improvements of Route 31 and related roadways.

### **Appendix D 3.3 Town of Clay Northern Land Use Study (see D-13 and D-14)**

Section D 3.3.1 establishes the fact that the construction of the Micron campus would not support the NLUS goal to preserve the rural character of the area; that it would be consistent with the studies' (NLUS) goal to concentrate large scale development around the white pine park, while the town undertakes efforts to relieve development pressure on other rural areas further away from the I 81/4 and public infrastructure. This is a bit confusing and should be clarified. The final EIS should also include specific references to the NLUS report (page numbers, etc.) and even provide copies of relevant exhibits pages from that report to establish the veracity of the conclusion provided in this analysis section on page D 14.

The town of Clay's NLUS includes recommendations to maintain the rural character of the area by focusing growth to suitable locations. These recommendations, according to section D 3.3 of appendix D, include permitting higher density large lot residential uses with a minimum lot size of 100,000 ft.<sup>2</sup> and encouraging cluster development with minimum lot sizes of 40,000 ft.<sup>2</sup> where suitable. This is also confusing, and these lot sizes seem contradictory to the need for housing to serve the expanded population and workers which the Micron project in a transit oriented manner. In the final EIS this should be clarified whether or not Clay's NLUS is consistent with the smart growth principles or not; exhibits should be included to demonstrate where and how induced household and commercial growth is intended to occur in the town of Clay. (This can be found on page D 14.)

The induced growth estimates included in Table C-4 (page C-10) indicate Clay may experience a 10% to 15% growth in households by 2024. Is this growth consistent with the NLUS and can it happen in a manner that is consistent with the Onondaga County Comprehensive Plan described in D-3.2 with lot sizes as mentioned on page D-14?

### **Section D3.5 NY Green CHIPS Program**

Appendix D, Section D 3.5 describes briefly the green chips program, and the incentives provided Micron by the State of New York for locating a chip project in Clay, NY. Analysis section D 3.5.1 states that the term sheet outlines Micron's **commitments** yet the term sheet commitments are largely not requirements, but only good faith efforts to meet the listed so called 'requirements'. It is my conjecture that the section in the Final EIS must list clearly

describe those requirements and establish definite assurances with specificity what and which of the term sheet requirements will be met and how each will be met. Without commitments which are measurable, and specifically required to be met, those **commitments** are worthless. The final EIS must clearly establish which of those requirements will be met, and to what degree.

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**From:** John Przepiora <jwp134@twcny.rr.com>  
**Sent:** Monday, August 11, 2025 9:42 AM  
**To:** chipsnepa@chips.gov  
**Cc:** 'Sustainability Coalition'  
**Subject:** [EXTERNAL] Micron Clay, NY Draft EIS 2025 Comment 2 of John Przepiora  
**Attachments:** DEIS section 3.1 and 3.7 growth induced effects comments by jprzepiora.pdf

The attached pdf document contains my comments on the DEIS issued for the NEPA and NY SEQRA reviews of the proposed Clay, NY Micron Chip Fab project. The subject areas included in this attached public comment include: DEIS sections 3.1 and 3.7 growth induced effects. Should there be any reason why you are unable to include these comments in the public record for this action, please advise ASAP so that a remedy can be sent; otherwise I will assume that the attached will be accepted and included in the record for appropriate response and consideration as the Final EIS is issued.

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## **Growth Inducing Effects**

### **3.1 LAND USE, ZONING, AND PUBLIC POLICY**

The **growth inducing effects** of the preferred alternative are described beginning on page 145 of the PDF, which is page 3–31 of the section. After the effects are summarized **section 3.1.4** titled **BMP's and mitigation measures** states that no mitigation measures are required because all the changes would continue to be subject to local discretionary approvals and planning policies, including applicable measures to avoid or minimize adverse development effects. Essentially kicking the can down the road for growth induced development without any strategy for minimizing or eliminating adverse environmental impacts of the growth which is estimated to be a minimum of 60,000 population increase and upwards of 27,000 new households regionwide. This DEIS insufficiently substantiates, on a town by town basis, the current state of development policies, plans, zoning and other relevant information that support or inhibit towns' ability to accommodate the projected population growth. Revise the EIS to include such documentation.

### **3.7 GREENHOUSE GAS EMISSIONS, CLIMATE CHANGE, AND CLIMATE RESILIENCY**

Similarly, under the **greenhouse gas emissions and climate change section 3.7.5** it is acknowledged that the project may stress the resiliency of the region to climate impacts; but that any future development would be conducted under applicable, applicable, state and local policies and programs, including smart growth public infrastructure policy act, CCLCPA, CRRRA, which leads to the DEIS conclusion that induced growth associated with the proposed project would not significantly negatively affect the current climate resiliency of the region. That is preposterous.

The EIS must estimate the climate impactful effects of growth as well as the related impactful effects of induced vehicle miles of travel. Failing to consider the GHG emissions associated with household growth and travel induced underestimates the climate and resiliency effects of the preferred alternative. Revise the EIS to include estimates of these effects. Furthermore, there is an opportunity to mitigate some of the adverse greenhouse gas/climate resiliency effects of the factories by assuring that harmful GHG and resiliency effects of induced households, commercial establishments and related vehicular travel are minimized utilizing creative solutions which may need to exceed requirements of existing policies in order to mitigate the effects of operating the chip fabs. Enhanced code requirements, transit oriented developments and travel services, and even cool roof technology could all be employed and financially supported by the applicant as mitigation of climate related stressors resulting from chip fabrication.

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**Cc:** 'Sustainability Coalition'  
**Subject:** [EXTERNAL] Micron Clay, NY Draft EIS 2025 Comment 3 of John Przepiora  
**Attachments:** DEIS section 3.7 climate resiliency and GHG emissions comments by jprzepiora.pdf

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The attached pdf document contains my comments on the DEIS issued for the NEPA and NY SEQRA reviews of the proposed Clay, NY Micron Chip Fab project.  
The subject areas included in this attached public comment include: Section 3.7, climate resiliency and GHG emissions.  
Should there be any reason why you are unable to include these comments in the public record for this action, please advise ASAP so that a remedy can be sent; otherwise I will assume that the attached will be accepted and included in the record for appropriate response and consideration as the Final EIS is issued.

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### **3.7.4 Climate Change and Resiliency**

The following from, 3-209:

“Increases in surface temperatures in the areas where the Proposed Project and Connected Actions would be located may further exacerbate already existing adverse effects of extreme heat. Impervious surfaces such as concrete and pavement can reach temperatures 40°F or more above grass temperatures under the same conditions (Knox, 2022). Increased pavement temperatures during or immediately after precipitation events can heat stormwater runoff that drains into sewers, further raising water temperatures when released into bodies of water, negatively affecting aquatic ecosystem productivity.”

The following from p 3-210:

“Increases in heat index (which pairs temperature with relative humidity), are expected to affect temperatures at the Proposed Project and Connected Action locations. High heat and moisture can cause structural weakening, corrosion of metal parts, shortening of roof lifespans, and wood damage through swelling and rotting. Air temperature and changes in humidity can impact building materials such as drywall, brick, and electrical systems. The Proposed Project will be engineered to withstand these temperature increases, and there is no reason to believe that the public utilities responsible for constructing and operating the Connected Actions would fail to engineer the structures to withstand anticipated changes in climate, including heat index. Micron’s Business Continuity process ensures that infrastructure is constructed with resiliency for natural disasters, climate change, and other factors in mind. In addition, the buildings will primarily be steel and concrete structures, not wood and drywall.”

The foregoing paragraphs assert that the preferred project will increase surface temperatures and heat index; yet in the following regarding surrounding area climate resiliency from p 3-212:

“The Proposed Project is not anticipated to significantly affect the climate resiliency of the surrounding area. The Proposed Project would not directly contribute to the demand for groundwater (see Chapter 3.10, Utilities and Supporting Infrastructure), increase the likelihood or severity of local flooding (see SMP discussion above, Chapter 3.3, Water Resources), and Chapter 3.11, Transportation), or affect the ability of the surrounding area to respond to future increases in temperature, storm activity, or precipitation. The Proposed Project would rely primarily on water withdrawn, and ultimately returned to Lake Ontario, which is one of the largest freshwater bodies in North America (see Chapter 3.10, Utilities and Infrastructure). While there are projections for increased

variability in lake levels under future climate scenarios, including potential for extreme highs and lows, the expectation is that water levels in the lake are anticipated to increase slightly in a future affected by climate change, which further indicates that the Proposed Project is unlikely to have any significant adverse impact on freshwater supply.”

It is difficult to see how this conclusion about heat island effects in the surrounding area can be reached after the foregoing paragraphs acknowledge the project’s effect will be to exacerbate heat island effects as wetlands are destroyed and buildings and pavements are added. There is no evidence of any measuring of existing surrounding area heat gradients nor projections of future surrounding area heat gradients. Heat island effects can have severe health and cost implications for the surrounding area which this DEIS fails to recognize and fails to suggest mitigating measures which are many such as choice of building materials (including cool roofing materials), and utilizing roof top solar to shade roofs—though these may not mitigate surrounding areas which may require direct intervention at the individual domicile level with retrofits, insulation, cool roofing materials and even payments to compensate area residents for increased electricity costs needed to cool their homes. It would seem Micron and this project’s proponents need to be held responsible and compensate the surrounding residents for these effects. Not only will Micron’s project indirectly adversely effect the climate by its generation of GHG emissions, but Micron will potentially and directly adversely impact residents of the surrounding area with direct heat island effects.

Relatedly, a **comment regarding the GHG projections of section 3.7** is necessary here. From pp3-205 & 206,

“For context, on a GWP100 basis, Proposed Project total GHG emissions would be approximately 2.42 percent of New York State’s 2022 statewide GHG emissions and 29.5 percent of New York State’s 2022 industrial sector emissions, which represent a significant increase in GHG emissions State- and industry-wide. Scope 1 and Scope 2 GHG emissions are roughly equivalent to the average annual GHG emissions of approximately 487,322 and 530,443 passenger cars per year, respectively (USEPA, 2024j).<sup>69</sup>

Based on the significant increase in GHG emissions, the Proposed Project would represent a significant adverse effect on GHG emissions.”

While it is laudable that this DEIS acknowledges the significant adverse emissions of GHG and even that a comparison to passenger cars per year is offered for visualization of the magnitude of the preferred project’s effects. However, these comparisons do not communicate adequately

to the average consumer of this document the damage which this level of GHG emissions will cause to our environment. I think this EIS document must do more to make it clear exactly to what extent Micron's projected emissions in Clay, NY will contribute to the toll of climate effects resulting from GHG emissions. While it may not be a perfect tool for a project such as this, EPA's methodology on the social cost of GHG may be useful to put in context the tradeoff with respect to climate damages being made in the selecting of the preferred option. For more about this method, see, [EPA Report on the Social Cost of Greenhouse Gases: Estimates Incorporating Recent Scientific Advances](#). By my calculation, and using this methodology with the social cost of the harmful effects of climate change attributed to GHG emissions at \$200 per metric ton of CO<sub>2e</sub>, Micron's annual contribution to the climate related damage affecting the nation from climate induced impacts of the GHG from the proposed Clay, NY fabs alone could amount to \$0.98 billion each year of its operation. How such a calculation could be useful in assessing the environmental, economic, and social impacts of the preferred alternative is perhaps debatable. However potentially the tradeoff might be whether the benefits of the preferred option are such that they offset the cost. Are they? Could Micron be expected to offset/mitigate this social cost by reducing GHG emissions elsewhere in the region? If not Micron, who be the bearers of this cost? Such an arrangement would move this preferred alternative from unsustainable to possibly a sustainable category.

According to a recent article published in The Atlantic Monthly,

“Last month, the world’s highest court issued a long-awaited opinion on how international law should regard climate harm. The International Court of Justice concluded, unanimously, that states have binding legal obligations to act to protect the climate system, and failure to do so—by continuing to produce, consume, and subsidize fossil fuels—may “constitute an internationally wrongful act.” In other words, curbing greenhouse-gas emissions is not merely voluntary in the eyes of the court; failure to do so is illegal.” (See: [America Is Living in a Climate-Denial Fantasy - The Atlantic](#); accessed 8/11/2025.)

Micron's failure, with assistance by US DoC, NYS and Onondaga County, to protect the climate system is potentially an internationally wrongful action which could result in the eventual award of damage compensation from legal actions initiated around the world. This EIS must acknowledge the responsibility to avoid actions which may cause climate damage in the interest of protecting U.S. and NYS residents not only from the effects of climate change, but from legally justified damage assessments awarded. Micron, NYS, Onondaga County and Department of Commerce should do the right thing and mitigate this potential before the project is permitted.

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**Sent:** Monday, August 11, 2025 10:33 AM  
**To:** CHIPSNEPA@chips.gov  
**Cc:** 'Sustainability Coalition'  
**Subject:** [EXTERNAL] Micron Clay, NY Draft EIS 2025 Comment 4 of John Przepiora  
**Attachments:** DEIS section 3.14 police\_fire\_EMS\_induced impacts comments of jprzepiora.pdf

The attached pdf document contains my comments on the DEIS issued for the NEPA and NY SEQRA reviews of the proposed Clay, NY Micron Chip Fab project.

The subject areas included in this attached public comment include: Section 3.14, police, fire, EMS impacts. Should there be any reason why you are unable to include these comments in the public record for this action, please advise ASAP so that a remedy can be sent; otherwise I will assume that the attached will be accepted and included in the record for appropriate response and consideration as the Final EIS is issued.

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*...Advocating for sustainable communities  
to the benefit of local economies and environments.*

### **3.14 COMMUNITY FACILITIES, OPEN SPACE, AND RECREATION**

Section 3.14 describes impacts on community authorities, including such things as police fire medical services and schools.

#### **Growth Inducing Effects**

##### **Police, Fire, and EMS**

For the most part, the conclusions here are that impacts (on community services) can easily be adjusted over the 16 year period of construction and growth of the facility and the regional population. However, those conjectures aren't supported by any clear disclosure relevant projections, municipal official confirmations or other factual information. The basis for this assertion should be disclosed in the DEIS: Which jurisdictions will see rising services demands, to what extent and cost, and where will funding come from to meet those needs. No such details are found to support the claim made that rising municipal revenue will offset service needs. A table describing these impacts would be helpful in order to justify statements that there will be minimal impacts on communities as growth occur. Clearly showing the potential for increases in said services (e.g., expected needs) and expected tax revenues in a table form would be helpful for the public to clearly understand what is being said about municipal services.

It is welcome that Micron proposes to support the training of fire officials and suggests that a feasibility study of methods to meet other apparent service needs that could be done with Micron assistance. This must be a requirement of Micron as a mitigation measure as there is no commitment on the part of Micron to undertake actions to assist with such services.

Page 3–460, page 574 of the PDF, states that in general because police services are funded by taxes, the increased tax base associated with induced population growth **'would likely help'** to fund the needs of police services to expand overtime to keep pace with the growth. Indeed, but where are the facts to back this up? And if the rising municipal revenues would likely **'only help'**, where will the other revenue come from to support these needs? It is very likely that the in migration of workers beginning with the construction phase will cause a rise in incidents and other criminal activity requiring police response that will tax the police and security services available and local policing agencies must prepare for the inflow of not only Micron workers, but other elements who will look for ways to capitalize, legitimately as well as criminally, from the money which will come into their communities.

Relatedly there is no detailed analytical disclosure of the cost to professionalize fire services or of needed upgrades to fire services in the town of Clay and or in Cicero. And what is the impact on the one hazmat unit existing for the region which resides with the city of Syracuse? Will it be necessary to expand hazmat services over and above the existing service provided by the city of Syracuse? And who will fund such improvements?

## Comments of John Przepiora on Micron DEIS: Growth Induced Effects on Community Services

Presumably municipal officials and managers were consulted before the conclusions or conjectures reported here were made. Is that true? And if so, letters or other correspondence substantiating said claims should be included in an appendix.

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**Cc:** 'Sustainability Coalition'  
**Subject:** [EXTERNAL] Micron Clay, NY Draft EIS 2025 Comment 5 of John Przepiora  
**Attachments:** DEIS section 3.15 housing growth impacts and mitigation\_jprzepiora.pdf

The attached pdf document contains my comments on the DEIS issued for the NEPA and NY SEQRA reviews of the proposed Clay, NY Micron Chip Fab project.

The subject areas included in this attached public comment include: Section 3.15, housing, growth impacts and mitigation.

Should there be any reason why you are unable to include these comments in the public record for this action, please advise ASAP so that a remedy can be sent; otherwise I will assume that the attached will be accepted and included in the record for appropriate response and consideration as the Final EIS is issued.

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to the benefit of local economies and environments.*

The household growth anticipated from Micron's worker populations at a community level is estimated to be of a scale the DEIS says may be 'readily noticeable' in terms of increased population densities, as well as increased commercial and residential activity.

The estimated population growth is 64,000 and 27,000 new households need to be developed in the 5 county study area; 85% of this is estimated to be in Onondaga County and 32% of that in the city of Syracuse. "Large enough to alter local and regional housing markets." Says the DEIS of the in-migration and growth induced.

Section 3.15.3.2 has this which is puzzling: "The in-migration of workers and families for construction of the Proposed Project in the local and regional study areas would not create direct or indirect effects to real property and housing within the local and regional study areas." (p3-482)

Though further down in Growth inducing effects it is said, "The Proposed Project's induced population would be large enough to alter local and regional housing markets. . . the Project's induced growth would generate housing demand at a scale not experienced since the 1970s." (p3-493)

Also, "The in-migrating labor force would increase the demand for housing and exceed available vacant supplies in the local study area.<sup>140</sup> Because Micron construction would begin as soon as practicable after all applicable regulatory approvals are secured, the local study area would likely not be able to provide new housing stock necessary to accommodate a substantial number of Phase 1 construction workers and their families." (p3-493)

Also, is this, ". . . there would be rent pressures attributable to the Proposed Project's induced growth in markets beyond the local study area . . ." (p3-494) and,

"The Preferred Action Alternative's induced housing demand may lead to rent increases and the potential to indirectly displace residents who cannot afford rent increases." (p3-502)

The way all of this is presented in the DEIS is very confusing, and should be clarified: there will be adverse effects on such things as housing costs, and housing affordability and that should be made clear. The magnitude of these impacts however is not estimated so I wonder: How it is possible to say, as the DEIS claims, that these effects will be short-term, perhaps four years as the market is expected to adjust in that time frame?

There is little or no detail in the DEIS to describe or estimate magnitudes of the short or long term impacts will be of such as: costs, rents, greenhouse gas emissions, potential for displacement or even homelessness.

For displacements, the DEIS estimates it is only in the local study area that the potential exists for displacement of residents resulting from rising housing costs; not suggesting that displacements in the Syracuse area are a potential impact resulting from rising housing costs. I question that conclusion: what studies is this conclusion based on?

The DEIS praises raising housing costs as a mechanism to get improvements to housing stock that has been allowed to deteriorate due to low housing values. While this may be true and perhaps positive, it still begs the question: will residents in places like Syracuse (as well as other neighborhoods) be able to continue to live where they have for years or will they be displaced as neighborhoods are 'gentrified' and rents rise to meet the rising demands for housing?

According to the recent Syracuse housing study, "***Syracuse*** [where 40% of households are renters] ***is disproportionately home to households with low incomes that struggle to cover housing costs. Onondaga County is highly segregated by income, with lower-income households concentrated in the city and higher-income households outside the city. Syracuse has 30% of the county's households but only 20% of all the county households with incomes of \$50,000 or more. Meanwhile, Syracuse has about 47% of county households with incomes of less***

*than \$50,000, and the poverty rate inside Syracuse is four times the poverty rate in the rest of the county.”*  
(Syracuse Housing Strategy, September 2024 Prepared for the City of Syracuse by czbLLC. P. 19)

Further, the Syracuse housing strategy says, **“7,605 households in Syracuse received some form of assistance in 2021 to alleviate cost burdens. Existing levels of housing cost assistance would have to triple to meet the needs of the 15,258 cost-burdened renters while continuing to assist these 7,605 households.”** (Syracuse Housing Strategy, September 2024 Prepared for the City of Syracuse by czb LLC. P. 17) And that isn’t even accounting for the rising housing cost Micron’s project will induce.

The DEIS presents no details on projected price increases or how much prices will change over time as Micron’s population growth increases. Were projections made to estimate how much prices will rise? And if not, how can you make statements about this impact only being ‘short term’ without such projections? Will there be an increasing number of homeless residents as a result of rising housing costs? And if so, what mitigation measures will be established to avoid this adverse impact? What will the impact be for those, such as seniors, on fixed incomes?

If such an assessment is available, the details should be included in the EIS. If such assessments are not available, I believe these impacts must be estimated utilizing appropriate and best available methods and professional judgement, and disclosed as part of the EIS.

\*\*\*\*

Relatedly, section 4, Cumulative Impacts, includes **Table 4.2-1 Present and Reasonably Foreseeable Actions** which lists amongst other things housing developments currently planned and in some stage of development. From my tally there are 5,852 housing units included, far short of the 27,546 estimated to be required by Micron’s in migration. Further, none of the listed units have been designated as ‘affordable’.

The **Growth Inducing Effects** section poorly explains how the growth induced impacts of the community will be met; it praises, in the abstract, the benefits that are estimated or intended resulting from fab development and from rising home values, but minimizes the adverse impacts which will likely arise without adequate preparation, infusion of funding and citizen oversight and engagement, which has been grossly lacking with this project to date.

The DEIS implies (i.e., many municipalities and counties have only outdated comprehensive plans) that the region is ill prepared for meeting the challenges which Micron’s induced in migration will create and that only by adopting future policies can growth be managed in a smart way. On page 3-33 (Section 3.1 Land use, Zoning and Public Policy) the following is stated:

*Although other counties and municipalities in the five-county study area have enacted comprehensive plans, there are few recent plans. The City of Syracuse Comprehensive Plan was enacted in 2012, the Oswego County Comprehensive Plan was enacted in 2008, and the Cortland County Consolidated Plan was enacted in 2002. Over time, other counties and municipalities could enact updated policies similar to the Onondaga County, Clay, and Cicero plans described above to include measures to mitigate adverse growth inducing effects from the Proposed Project, while harnessing smart growth principles, such as the goals outlined in the Onondaga County Comprehensive Plan, to realize positive benefits from induced growth in the region. In particular, future planning policies could direct development to appropriate locations with the fewest adverse effects to farmland.*

Has there been an analysis of existing comprehensive plans and zoning to assess the feasibility of developing the additional housing units needed to reach the projected 27,000 estimated to be needed? The DEIS on page 3-33

asserts that the Onondaga County Comprehensive plan will guide this (for Onondaga County at least) though this isn't enforceable on the county's towns. It would be useful to have a table summarizing where development will or can occur to substantiate the ability for the region to accommodate in-migration.

A table listing towns, status of plans, and estimated number of units reasonably expected to be accommodated (given existing plans and zoning, etc.), and changes in plans, policies or zoning needed to meet expectations would be useful so we can clearly see the basis for the statement that the housing market will adjust to meet the demand.

I would like to know, and permitting agencies should know, whether the Micron in-migration can be accommodated before permits are issued for this project. Have Towns expressed support for or against these residential growth projections? And if so, please include this evidence to document each town's concurrence or disfavor. Further, how many new miles of roads, and other infrastructure, will be needed to accommodate such growth?

Page 3-33 also contains this:

*Under the Comprehensive Plan, municipalities in Onondaga County would be expected to conform future discretionary land use and zoning actions to facilitate new housing and business development in appropriate locations with the fewest adverse effects (e.g., adverse effects on infrastructure capacity or farmland).*

What does 'expected to conform' mean here? As far as I know, towns are free to adopt town plans and can't be required to adopt policies imposed by Onondaga County. Is the Onondaga County Plan a mandatory proscription imposed on Town governments? Please clarify this in the EIS.

Page 3-503 in the **mitigation measures** (section 3.15.4 page 3-503) contains the claim that Micron does not control the housing market and cannot specifically mitigate such impacts, only that Micron will "continue to **work with** agencies and stakeholders to identify specific actionable measures to avoid or minimize the potential for short term significant adverse effects" on the local housing market. I think the public needs more than '**work with**'. The public needs assurances that housing disruptions will be mitigated. We need more than '**work with**'. What does that mean anyway? The DEIS has a local study area and a regional study area. How is the 'local housing market' defined for purposes of the DEIS? Is this pledge to '**work with**' applicable to the entire regional study area? What about affected areas outside of the regional study area? Again, what is work with? We need specific and measurable objectives to which Micron must be held accountable.

**Additional Comments:**

**Section 3.15 Environmental Analysis: Socioeconomic Conditions and Section 3.7.5, Economic Development, Labor, and Employment and Mitigation Measures**

**1. The intersection of household growth and GHG emissions** is something that deserves additional scrutiny and additional analysis in the EIS. Although admitting that “induced growth from the Proposed Project may stress the resiliency of the region to climate impacts”, it either dismisses the GHG impacts of induced growth as minor compared to the fabs themselves so no need to further assessment, since “any future development would be conducted under applicable State and local policies and programs, including the Smart Growth Public Infrastructure Policy Act, CLCPA, and CRRA”, there is no need for further assessment or mitigation at this time. I don’t agree.

Regardless of the relative magnitude of GHG emissions from each sector, the GHG emissions from induced residential and commercial growth (or even supply chain industries) should be accounted for and reported in the EIS. Minimizing the carbon footprint of the induced household growth should be required as an offset against the carbon footprint of Micron’s Clay, NY fabs which Micron should be required to fund.

Financial mitigation measures should be imposed on Micron to offset fab GHG emissions at the fabs which they claim are not possible to eliminate by the funding the elimination of the GHG emissions associated with residential and commercial growth induced. This could be direct funding of the added cost of renewable energy projects, offsetting the cost of higher standard energy codes for new development, incentivizing transit oriented and walkable communities, incentivizing commuting via transit, incentivizing construction of affordable and green housing, etc.

The cost to eliminate the GHG/climate related costs should be allocated to Micron and not placed on the shoulders of our residents.

**2. Economic Development, Labor, and Employment**

In the subsection, **3.15 section on economic development, labor, and employment**, which begins on 3–488, the impacts of operational activities on economic development, labor, and employment are said to be not a significant adverse effect. However, it seems preposterous that Micron’s employment would not have adverse impact on the cost of labor for other businesses and manufacturers in the central New York area. The DEIS implies these employers will not see an adverse impact on their abilities to retain or pay workers. The EIS must substantiate this claim with data. Have other regional electronics manufacturers or other employers been consulted to assess projected impacts once Micron begins hiring production workers?

On page 3-485 describing labor shortages during construction—expected to last 16 years—the statement is made that shortages of labor are expected to be limited and short-term, but I find no documentation about how this broad conclusion was reached. Where are the facts? Please include a detailed analysis of the facts that lead to this statement. On page 3-486 a statement is made about ‘working with local partners to identify the potential to source approximately 76 percent of the labor necessary for the construction of Fab 1 from workers living within a 90-mile radius of the Micron Campus. . .etc.’: Is this claim substantiated in the DEIS? Where and if not, please include a listing of those local partners and details of what this ‘working with’ has discovered to substantiate this claim.

Labor shortages relating to both construction and operational phases are important topics and important impacts which are not completely recognized in the DEIS. While it may be true that training programs will increase the labor supply and mitigate upward pressure on labor costs, the DEIS seems not clear about this, and details supporting

claims are lacking. The DEIS should be amended to clearly describe projections and actions related to labor acquisitions, training, in-migration and impacts on existing employers; provide details, not just abstract conjecture. The way it is presented here makes it difficult to understand or to see the validity of the claims.

Micron will likely affect the overall job market, in both short and long term, and other businesses in the central New York area will be affected. The EIS should provide a clear, fair, unbiased, and detailed assessment of this impact.

### **3. Mitigation**

Section **3.15.4 Mitigation Measures is totally inadequate**. The growth inducing effects of in-migration is estimated to include 64,000 region wide population increase and 27,000 households needing to be constructed. The effects and costs such as the need for new roads and other infrastructure have not been estimated or described in the DEIS. The rising housing cost is generically suggested but details are lacking. There is no estimation of the adverse impacts of rising housing costs on current residents and no consideration of the potential for homelessness to increase, or any suggestion for how housing can be developed in a sustainable manner except to say that future policies can be adopted to control how and where smart growth can occur.

**Mitigating measures relating to growth inducing impacts** such as the following must be imposed:

Creation of a citizens conservation management and environmental mitigation and sustainability council to oversee all actions relating to the environmental impacts of the fabs as well as the induced growth and mitigation of its effects.

Creation of an independent professional planning team (perhaps within the Regional Planning and Development Board) dedicated to growth issues in the 5 county study area made up of professional, certified planners to oversee, review, and manage growth related mitigation measures.

Adequate public (or Micron provided) funding for staffing of the planning team and the citizens' council, as well as funding for incentives or subsidies needed to mitigate problems related to housing shortages, affordability, and avoidance of homelessness.

The funding of these initiatives could be similar or related to the green chips community benefits fund, Micron's contribution to the existing community benefits fund of \$250 million is a drop in the bucket when one considers the needs, as well as Micron's ability to pay. Shareholders get regular dividends, and they should pay necessary costs to mitigate the impact on this community.

Perhaps the PILOT payments are sufficient to meet all the needs of the community to eliminate adverse socioeconomic impacts, municipal services, offsets to prevent adverse housing affordability impacts or even to reduce greenhouse gas emissions of induced growth. If so, the EIS should make it clear that such is the case. I see little evidence of that in the DEIS except for glib statements that expanded services needed by municipalities for things like police and fire services will be offset by PILOT payments. The EIS should explain and describe community costs and assess whether PILOT payments will be sufficient to meet community needs and mitigation costs.

**Growth Induced GHG emissions must be mitigated**. Minimizing the carbon footprint of the induced household growth should be required as an offset against the carbon footprint of Micron's Clay, NY fabs which Micron should be required to fund.

As a consequence for approving the fab development project, binding mitigation measures, e.g. a binding mitigation plan with measurable and achievable objectives, which will offset the adverse impacts of the induced growth must be established and include, in addition to those previously stated structural components, the following smart growth conditions:

All residential and commercial development must be in accordance with smart growth principles which minimize GHG emissions, create walkable and transit oriented (and serviced) communities.

All residential and commercial developments should be powered solely by renewable, non-fossil fuel energy.

Housing developments must include a variety of types, uses and affordability options.

Anti-gentrification and anti-displacement provisions must be established as high priority goals; and procedures, plans and controls established to prevent neighborhood gentrification, and resident and local business displacement.

The principles and methods to meet the intent of this mitigation plan shall be subject to further development, review and recommendation by a citizens conservation management, sustainability and mitigation council.

Funding commitments established to incentivize smart growth developments to be provided by Micron or from state and local revenues derived as a result of the fab and other chip developments.

Micron shouldn't be allowed to locate here and create diverse environmental impacts and not pay for the destruction and disruption. It isn't enough to say that since Micron pays wages and makes PILOT payments, housing prices are rising, and that the project meets all of the community's policy objectives that all impacts are balanced out against the economic benefits. No. Micron must be made to offset damages they are allowed to induce with financial contributions over and beyond wages, PILOT payments, the one time contribution to the community benefit fund and rising real estate values. The costs of these adverse impacts should be paid by Micron and not placed on the shoulders of our residents. A community cost and benefits agreement should be negotiated as a mitigating measure; and until such an agreement between the community and Micron is created, with the input and approval of key regional community groups, the project must not be permitted.

**The Green Chips CEC and the "Community Priorities Document"** includes input from central New Yorkers but much of what the CEC has reported as priorities has not been included as important project components or mitigating measures to assure that appropriate community benefits accrue to residents and that adverse impacts avoided.

There is recognition in the CEC report of the need for good public transportation to serve the area, though Micron will have 12,000 parking spaces and the DEIS fails to suggest the need for a robust transportation management program which utilizes transit, minimizes space requirements for parking surfaces and reduces related stormwater and vehicle-trip related GHG emissions. Also, the CEC document gives a high priority to affordable housing, but the DEIS fails to evaluate how in-migration and rising housing prices will impact existing residents, nor does it include plans to minimize the housing impacts except to say that the housing market will adjust in 4 years' time or that existing policies or future ones will take care of this. This isn't sufficient. The Federal government, the state of NY and the County of Onondaga want to bring a mega chip fab to CNY but have yet to do the planning and community development necessary to avoid harmful impacts on our CNY community. We need more than one 46 page CEC report to prepare and avoid Micron's harmful impacts.

I find it ironic that the CEC report states, “The Community Engagement Committee emphasizes the importance of ongoing public engagement to ensure the community’s evolving priorities are accurately represented.” I don’t know of anyone who has participated in the process or who is currently participating, or even if this CEC still exists. I don’t want to impinge the sincerity of the CEC, or the people who participated in their engagement process, but it seems like their credible effort in community engagement and priority setting is being wasted if these priorities aren’t included in the project and used only to greenwash the project. The facts that OCIDA and Department of Commerce have refused to extend the comment period for this DEIS process, or that there has been little public engagement by Micron, the County or DoC about this project and its impacts, demonstrates there is a lack of ongoing public involvement which the CEC emphasized as important. I understand that CEC’s Green Chips process was narrowly focused and limited to priorities for allocating the community benefits fund and not intended to serve the full range of this project’s sustainability needs (as the report says, “Moreover, the Community Engagement Committee operates independently of processes involving environmental assessments, sustainability studies, or governmental incentives.”). However, it is time for this to change, and a robust community involvement structure as suggested above, along with a broad community benefits agreement, must be established should this project move forward.

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**From:** John Przepiora <jwp134@twcny.rr.com>  
**Sent:** Monday, August 11, 2025 10:54 AM  
**To:** CHIPSNEPA@chips.gov  
**Cc:** 'Sustainability Coalition'  
**Subject:** [EXTERNAL] Micron Clay, NY Draft EIS 2025 Comment 6 of John Przepiora  
**Attachments:** DEIS section 4.0 cumulative effects\_jprzepiora.pdf

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The attached pdf document contains my comments on the DEIS issued for the NEPA and NY SEQRA reviews of the proposed Clay, NY Micron Chip Fab project.

The subject areas included in this attached public comment include: Section 4.0 cumulative effects.

Should there be any reason why you are unable to include these comments in the public record for this action, please advise ASAP so that a remedy can be sent; otherwise I will assume that the attached will be accepted and included in the record for appropriate response and consideration as the Final EIS is issued.

**John Przepiora**  
**Syracuse, New York**  
President & Director  
**GreeningUSA, Inc.**  
(315) 382-3829  
GreeningUSA.org



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to the benefit of local economies and environments.*

#### **4.0 CUMULATIVE EFFECTS**

Chapter 4, cumulative effects, is very confusing. It is unclear whether the entire growth induced effects of population increases are being considered as an accumulative impact in the analysis of cumulative effects. It is unclear whether the entire growth induced effects of population increases are being considered as cumulative in this analysis. In some places it appears that only those projects that are listed in a table 4.2 – 1 are considered as contributing to cumulative effects, but certainly there will be cumulative effects of the entire growth induced housing.

The expanded population with related needs for transportation and commercial purposes are growth induced effects as well as cumulative. My suggestion is that this section be clarified to be more specific as to whether or not the population growth induced is included in the considerations about cumulative effects.

One important part of cumulative effects are greenhouse gases. And it should be made clear whether or not the cumulative impacts of greenhouse gas emissions from the induced households have been included in the section. One specific area of confusion is in section 4.3.7.2 mobile source greenhouse gas emissions; here the statement is made that mobile source greenhouse gas emissions for the preferred action alternative which includes induced growth will result and higher mobile source greenhouse gas emissions compared to the no action alternative. But it is unclear if those greenhouse gases only include transportation related impacts, or do they include stationary impacts of housing for the growing population.

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**From:** John Przepiora <jwp134@twcny.rr.com>  
**Sent:** Monday, August 11, 2025 11:07 AM  
**To:** CHIPSNEPA@chips.gov  
**Cc:** 'Sustainability Coalition'  
**Subject:** [EXTERNAL] Micron Clay, NY Draft EIS 2025 Comment 7 of John Przepiora  
**Attachments:** DEIS and household induced growth LTE by jprzepiora.pdf

The attached pdf document contains a comment, in the form of a letter addressed to the editor of our local newspaper plus related documentation, on the DEIS issued for the NEPA and NY SEQRA reviews of the proposed Clay, NY Micron Chip Fab project. I am submitting this for inclusion in the public comments record for the NEPA and SEQRA reviews. The subject areas included in this include: Household induced growth with references to information found in sections 3.15 and 4.0.

Should there be any reason why you are unable to include these comments in the public record for this action, please advise ASAP so that a remedy can be sent; otherwise I will assume that the attached will be accepted and included in the record for appropriate response and consideration as the Final EIS is issued.

John Przepiora  
Syracuse, New York  
President & Director  
**GreeningUSA, Inc.**  
(315) 382-3829  
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To the editor:

There needs to be more reporting on the housing issues relating to Micron, particularly local residents' ability to pay rising housing costs which will be supercharged by Micron's development and its spinoffs. The DEIS fails to assess the magnitude of rising housing costs which will fall disproportionately on low income households, such as in Syracuse, where many residents are already rent burdened. Will there be an increase in homelessness? How many will be forced to relocate due to rising rents?

The DEIS lists just 15 residential developments with 5,852 units (none affordable) currently planned. This represents 21% of the 27,000 claimed to be needed. Onondaga County's recent comprehensive plan provides a vision for smart, town centered growth, but outdated town plans and zoning regulations need to be revised to allow it.

We taxpayers already foot the bill for federal, state and county subsidies for Micron and we shouldn't have to pay more for housing because Micron makes chips here. Existing overburdened residents should not have to pay more for their housing, nor be displaced by unaffordable housing costs.

Though rising property values may spur redevelopment of severely dilapidated Syracuse housing, the DEIS says little about how cost increases will be mitigated beyond that Micron will "continue to work with agencies and stakeholders to identify specific actionable measures to avoid or minimize the potential for short term significant adverse effect." I'd like to know what 'work with' means, and what Micron will spend to mitigate the housing crisis the fab development will supercharge.

John Przepiora  
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Micron's DEIS Housing related facts and statements\*:

27,546 new households are required to accommodate 64,000 migrants. (p3-491-492)

85%, or 23,000 households, will be added in Onondaga County with approximately 32% of those within the city of Syracuse. (see Table 3.15-5, p3-492)

The "induced population would be large enough to alter local and regional housing markets" and household growth would "be of a scale that may be readily noticeable." (p3-493)

The "in-migrating labor force would increase the demand for housing and exceed available vacant supplies in the local study area." (p3-493)

". . . there would be rent pressures attributable to the induced growth. . ." (p3-494)

". . . rent increases [have] the potential to indirectly displace residents . . ." (p3-502)

15 residential developments with 5,852 units (none affordable) currently planned representing 21% of the 27,546 claimed to be needed. (Personal computations based on Table 4.2-1. Present and Reasonably Foreseeable Actions, p4-6)

\*These statements and facts compiled by John Przepiora and are based on statements included in: **Micron Semiconductor Manufacturing Project, Clay, NY Draft Environmental Impact Statement** EISX-006-55-CPO-001 | June, 2025 published by U.S. Department of Commerce, CHIPS Program Office, Onondaga County Industrial Development Agency, U.S. Army Corps of Engineers, & U.S. Environmental Protection Agency.

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**From:** John Przepiora <jwp134@twcny.rr.com>  
**Sent:** Monday, August 11, 2025 8:48 PM  
**To:** 'chipsnepa'  
**Cc:** Robert Petrovich  
**Subject:** [EXTERNAL] Micron Clay, NY DEIS Comments

To: David Frenkel,

This email is for the purpose of confirmation that earlier today (August 11, 2025), from this email address I submitted seven email messages transmitting seven pdf files with various comments in response to the request for public comments on the Micron, Clay NY DEIS. Additionally, from the address [John@GreeningUSA.org](mailto:John@GreeningUSA.org) I transmitted an additional pdf file with comments on behalf of GreeningUSA, Inc. If there was any difficulty with the receipt of any of those files I would appreciate being informed ASAP in order to correct the matter. Thank you for the opportunity to comment on this very important project.

John Przepiora  
President & Director  
**GreeningUSA, Inc.**  
(315) 382-3829  
GreeningUSA.org



*...Advocating for sustainable communities  
to the benefit of local economies and environments.*

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**From:** John Przepiora <john@greeningusa.org>  
**Sent:** Monday, August 11, 2025 3:03 PM  
**To:** chipsnepa  
**Cc:** Sustainability Coalition  
**Subject:** [EXTERNAL] Micron Clay NY DEIS Comments by GreeningUSA, Inc.  
**Attachments:** Micron Clay NY DEIS overview and general comments by\_greeningUSA.pdf

On behalf of GreeningUSA, Inc., the Syracuse, NY based not-for-profit organization, and its board of directors, I am submitting the attached pdf with comments on the Micron Clay, NY DEIS. Should there be any reason why you are unable to include these comments in the public record for this action please advise ASAP so that a remedy can be sent; otherwise I will assume that the attached is acceptable for inclusion in the public record for appropriate response and consideration as the Final EIS is issued. Thank you for the opportunity to submit these comments. If you have any questions, please contact me.

John Przepiora  
Syracuse, New York  
President & Director  
**GreeningUSA, Inc.**  
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*...Advocating for sustainable communities  
to the benefit of local economies and environments.*

**These comments are submitted on behalf of the board of directors for GreeningUSA Inc., a Syracuse, NY membership not-for-profit organization which has advocated for sustainable communities to benefit local economies and the environment over 21 years.** The sustainability principles for which our organization stands are defined in our “Twelve Traits of a Sustainable Community” which can be found at [www.GreeningUSA.org](http://www.GreeningUSA.org). Through the lens of these traits, the proposed Micron development, as described in the DEIS, is fraught with constructs contrary to the principles which our organization promotes. At a time when our environment is afflicted with a growing climate crisis, the quality and quantity of our water and air are being degraded, and economic and social inequities divide the people of our region, a commitment to sustainable development is critical. In our view, development that is sustainable links economic development to environmental protection, and human wellbeing to the cross-generational responsibility to protect and sustain resources for future generations. A somewhat similar notion of the responsibility that nations have was previously set forth in principles enumerated in the 1972, ‘Declaration of the United Nations Conference on the Human Environment’ which asserted that “man has the fundamental right to freedom, equality and adequate conditions of life, in an environment of a quality that permits a life of dignity and well-being, and he bears a solemn responsibility to protect and improve the environment for present as well as future generations.” Simply put, sustainable development is development that meets the needs of the present without compromising the ability of future generations to meet their own needs. Even with a limited time for review of the recently issued DEIS, GreeningUSA has concluded that many aspects of the Micron development project promoted by our Federal, State and County governments are contrary to sound sustainability principles and potentially endanger the health and well-being of the region.

The 719 page DEIS and its 19,000 pages of appendices are not possible for us, or anyone, to review all aspects of the project in the 48 days allowed. Previous requests submitted by others, including GreeningUSA members, for an extension of the public input have not been responded to. While 48 days exceeds the minimum requirement for SEQRA and NEPA, this limited time frame for a complex project is contrary to the spirit of NY’s SEQRA which places high importance on public participation. The DEC’s SEQRA handbook says that ample opportunities for public involvement “allow the public and other agencies to provide input into the planning or review process, resulting in a review with a broader perspective. It also increases the likelihood that the project will be consistent with community values.” ( DEC SEQRA Handbook 4<sup>th</sup> Edition 2020, p.4)

**Two of perhaps the most important traits of a sustainable community are governmental leadership and citizen engagement.** In light of the fact that the proponents of this project, including the County of Onondaga, have spent very little effort to engage citizens in dialog over

this project, cutting the review process short disregards the public's right and responsibility to give informed input on something that will affect our future, and the future of generations to come. Creating obstacles to citizen engagement is contrary to the principles of sustainability.

Major components of the project each deserve public scrutiny of 30 to 45 days. These multi-components, lumped together with this project's overlapping multiple phases, make this DEIS difficult for anyone, including the most intelligent and experienced planning and development expert, to review, understand and respond within 48 days. Please extend the public comment period to at least 120 days, until October 23 to give the public and GreeningUSA a better opportunity to comment and a chance to review additional sections we have been unable to get to.

Based on the environmental impacts found in the DEIS, it is our opinion that this project does not adhere to many principles of sustainability and therefore must not go forward without major changes. We have come to this conclusion after consideration of the following.

**The project will destroy a critical ecological resource by filling and destroying the White Pine wetlands** that serve many useful purposes, which are not thoroughly assessed in the DEIS. An insufficient mitigation plan is proposed. The existing well developed wetland cannot be adequately replaced with the mitigation plan as proposed. Experts we have consulted advise that perhaps even a 7 to 1 replacement strategy may be necessary but that may also be insufficient. We are in the era of climate chaos, with heat disrupting people's lives in profound ways. This site is a sink to not only keep carbon out of the atmosphere, but serves as an air conditioner to cool the surrounding environment and a bathtub to keep flooding in check.

Adding a huge concrete factory and surrounding pavements only adds to the heat island effect exacerbating the adverse impact of having destroyed the wetland and forested site in the first place. Replacement wetlands proposed will not replace the valuable functions of the WPCP wetlands, including heat island mitigating effects, without additional study of heat island effects and inclusion of additional mitigating measures. After assessment of heat island effects using state of the art measurement techniques, heat island mitigation practices must be established, and a program for long term monitoring and adjustment procedures must be established.

**This proposed factory will pollute the air with carbon and other GHG including hazardous chemicals.** Water will also be at risk of being polluted with hazardous, forever chemicals which are unregulated. A GHG mitigation strategy that may need to reach

beyond Micron's campus footprint must be established so that this campus and its induced growth will not make the statewide goals of the NY CLCPA unachievable.

Lacking from the DEIS is an analysis of the social cost of the factory's GHG footprint. Including such an analysis, using methodology such as social cost estimations generated by EPA's peered review interagency modeling (see [EPA Report on the Social Cost of Greenhouse Gases: Estimates Incorporating Recent Scientific Advances](#)), would put into context incremental external costs to the nation which this singular project will contribute. Such an analysis would provide a reference value to consider in a reevaluation of the costs and benefits of the Clay, NY Micron chip fabs, and would be useful for reconsidering the conclusion that 4 four fabs are necessary to provide necessary ROI and the rationale for the preferred alternative proposed.

**The EIS should fully disclose in a comprehensive, easily understood manner all municipal costs to be incurred for expanded municipal services**, external environmental costs which can be anticipated and estimated, and revenue expected to be generated in the form of taxes, fees or other payments. Relatedly we do not see a comprehensive cost benefit analysis for the preferred alternative in the DEIS beyond the results presented in Appendix C prepared by REMI. This analysis fails to account for the environmental costs, including such things as the social cost of GHG emissions. The DEIS also fails to disclose in a comprehensive and easily understood manner the costs which will be incurred by local and state governments in support of this development, including costs of the connected water and wastewater systems or other municipal services, such as police and fire, which are necessary to serve the development, and the induced growth; nor are the revenues to be achieved over time by the taxing and service jurisdictions in the region listed in a manner the public can readily understand.

**Construction activity will impose adverse impacts on the surrounding area for years to come** with noise and traffic, which could make the area an intolerable location in which to live. A local citizens' advisory board must be established to allow local residents to be kept advised of construction activity impacts and allow for input to minimize disruptions impacting local residents. Micron should also develop ways to minimize these impacts including the possibility of reducing the number of fabs to shorten the construction period and lessen related impacts. Micron's refusal to consider a smaller project without transparent justification and analysis of the mitigating effects of a reduced footprint, or shorter construction period is a non-starter. Sustainability requires balance, and this project, with 4 fabs, may be unbalanced for the site selected and the impacts it presents.

If the project's economic development objectives can be achieved with a smaller environmental footprint this project may be more sustainable.

**Once operational the 12,000 car parking lot will impact residents in the surrounding area by attracting increased automobile traffic to the area.** Reducing the footprint for parking and creation of a transportation management plan (TMP) with reliance of mass transit, incentives for workers to utilize transit, and even financial support to create an effective multi-modal transportation system to serve its campus and the regional needs of its workers, would serve to make this project more sustainable than its current configuration and reliance of personal vehicles. A TMP with fewer parking spaces available can have multiple benefits including reduction of paved surfaces and stormwater quantity, improvements to water quality, lower GHG emissions, and less wetland destruction.

**One objective of the development is to solve the region's long standing poverty,** yet there is no assurance that local workers and local residents will reap the benefits purported to be an objective of the project. The DEIS must include clear estimates, if not commitments, of the types of jobs and wages that will be available to local residents. Micron needs to make commitments to a labor peace agreement to allow workers freedom to choose to unionize or not, and a community benefits agreement with firm commitments for local workers, worker health and safety, and programs to assist local and regional residents with rising housing costs that will be induced by the project.

**The projection that workers will immigrate to the region, increasing the population by over 64,000 and 27,000 new households,** flies in the face of the promise of good paying jobs to lift the local residents out of poverty. Micron must strike the correct balance of local and non-local hiring in order to achieve a sustainable project that will actually raise the wealth level of the local residents and reduce the impact of rising housing costs.

**There is no assessment of, nor assurance that rising housing costs will not adversely impact** the city of Syracuse (or other) renters who currently are cost burdened or on fixed incomes; or impact those wishing to build or buy a home only to find home prices and construction costs make that impossible. Gentrification, with attendant displacement and increased homelessness, is a potentially adverse impact which is not sufficiently addressed in the DEIS, and it should be. A public participation effort that places high regard for transparency and public engagement should be established to help manage the risks of gentrification and maximize the utilization of local workers.

The impact of developing an estimated 27,000 new household units is ill assessed in this DEIS. To rely on the hope that future planning and development policies will match the vision of the Onondaga County comprehensive plan for smart growth isn't sufficient. Real planning and commitments are necessary, and I see little of that detailed in this DEIS.

**The carbon footprint of the induced residential and commercial development isn't estimated** in the DEIS; nor any mitigation specified or required. They should be. Relying on existing or unknown future policies isn't acceptable, nor is rushing to get this project going without clear understanding, policies, and plans about how the environmental and economic impacts of the induced growth will serve the community's needs in a sustainable manner.

**A rebalancing of the size of the project and the magnitude of the impacts with a "build, operate and assess" adaptive management** approach may be a way to move forward with caution. Micron claims that the only alternative is to build 4 fabs; that fewer than 4 is uneconomical, robbing them of the needed ROI to make the Clay, NY project viable. This assertion isn't sufficiently supported by evidence particularly when fab projects elsewhere have fewer fabs at one location.

If four fabs are required for WPCP, the approval process should be contingent on an adaptive management incremental phasing sequence to ensure that commitments made are kept, and environmental impacts/costs are manageable in a sustainable manner, before continuing to build out additional fabs.

**The infrastructure expansion of the induced residential and commercial growth isn't estimated** in the DEIS. How many miles of new roads, water lines and sewers will be needed to serve 27,000 new households? How much land is needed to be developed? None of these are presented in the DEIS. We believe they should be, at least at some planning or schematic level of estimation.

**Micron must fund mitigating measures deemed necessary to protect the region from the adverse impacts.** It is unclear that PILOT payments, wages paid, or rising real estate values will offset adverse impacts. Offsets against added municipal services, incentives to assure sufficient affordable housing is available, and payments to offset environmental degradation should all be Micron's and its shareholders' responsibility, not current residents. The DEIS must do a better job of displaying and conveying the facts about the costs and benefits which municipalities and their residents will

experience in a clear concise manner. Using tables to summarize the effects, costs and revenues should help to convey this sort of information in an easily understandable fashion.

**With its many phases and components this project makes the DEIS complex and difficult to comprehend.** NY's SEQRA requires the public to be informed about environmental, economic and social impacts. This DEIS has limitations which need to be corrected in a way the general public can understand. Asking the public to digest 20,000 pages in 48 days isn't a sustainable practice either.

**The Micron project as currently envisioned and described in this DEIS is not an example of sustainable development.** Let's not delude ourselves. While Micron touts itself as a company that values sustainable practices, the Clay, New York project falls short of what is necessary to be a truly sustainable development. Unless the White Pine Commerce Park development is dramatically reimaged, the project on balance cannot be supported by GreeningUSA for reasons mentioned here. We urge that permits not be issued for this project until unsustainable components and practices are sufficiently mitigated.

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**From:** Prickard15@twcny.rr.com  
**Sent:** Monday, August 11, 2025 4:18 PM  
**To:** 'chipsnepa@chips.gov'  
**Subject:** [EXTERNAL] Micron

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To whom it may concern,

My permanent address is in Radisson, an HOA community very close to where Micron is planning on constructing their huge and dangerous complex for their business. Of course, as soon as I had heard about this I have been alarmed at the environmental impact on our region. It was evident to me that Upstate New York and our region was prime for this massive busienss development mainly due to our rich and pristine supply to our waterways, rivers and beautiful lakes.

Where this is being purposed is already overcrowded with little space for such an operation. The interstructure isn't there and route 31 and other roads are already over used making just getting through from Radisson to say Camillus can be very difficult due to the present traffic that is forced to use this way to and from many connecting areas.

But most of all a long time paying member to several associations to protect our environment, I firmly oppose going forward as planned. It is being forced down our throats with not enough care in realizing the future devastation that this endeavor will put on our region.

I say it must NOT happen.

Feel free to contact me for my further commentary on this. I have not responded sooner as I've been dealing with some personal issues that took me away from expressing my thoughts and my complete disdain for this massive project.

Regards,  
Patricia Rickard

3168 Cadys Arbor  
Baldwinsville, NY 13027

and  
14566 Lake Street  
Sterling, New York 13156 home phone: 315 904-2030

Cell Phone 315 369-8729  
Prickard15@twcny.rr.com

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**From:** Deborah Rose <dcurryrose@gmail.com>  
**Sent:** Monday, August 11, 2025 7:50 PM  
**To:** CHIPSNEPA@chips.gov  
**Subject:** [EXTERNAL] Draft Environmental Assessment EISX-006-55-CPO-001

As a long-time Syracuse resident, I have serious concerns about Micron's proposed semiconductor manufacturing plant in Clay and its impact on the environment and the quality of life in Central New York (CNY). I, like much of the CNY population, live here because of its beauty and its affordability. Both of these appear to be threatened by this project.

Bottom line, Micron's goal in bringing a chip plant to CNY is to make a profit. Millions of taxpayer dollars have already been committed to the project and we need to ensure that, in return, Micron operates in our best interests and addresses all potential environmental threats in both its construction and its ongoing operation. With our current knowledge about the long-lasting environmental and human damage that industrial development projects can bring, we can't repeat mistakes like those made in the past in service to the profit motive.

Based on my current understanding of the DEIS, I'm submitting the following comments that speak to some of my concerns about:

- the impacts of this project on CNY land, water and air
- the impacts on human and other species currently living on the land or surrounding areas
- the energy and water requirements of the project, and
- the inadequate plans for mitigation provided in the document.

Toxic chemicals – The DEIS does not identify all of the chemicals that will be used in the chip production process or adequately address plans for preventing release of these chemicals into the environment. Micron must provide a list of these chemicals and detailed plans for how all chemicals (including PFAS and other toxic chemicals) discharged during production will be processed in a way that will not pollute our air, land or water. The final DEIS should address how toxic waste captured during this process will be handled and stored. It should also address how toxic chemicals will be stored and handled pre-production to ensure the safety of Micron employees and the environment. And it should identify a plan for oversight and how compliance will be monitored. Micron must ensure that no toxic chemicals will be brought on site before all processes and

equipment needed to prevent toxic chemicals from entering the environment are in place, including all county-operated wastewater treatment facilities.

Land use – Construction of the Micron plant will result in major changes to the landscape and significant habitat loss. The project site is home to not only endangered bat species and threatened and near-threatened bird species, but a rich variety of other species that add to the richness of this area of CNY. With loss of habitat, many of these species will be displaced and some will die. The wetlands that are lost are simply not replaceable by the smaller scattered parcels of land that are planned to compensate for the current habitat. In addition, the proposed replacement wetland sites are yet to be developed and the displaced creatures will need to find someplace to “hotel” while this development occurs; many will not survive. In the final DEIS, Micron should significantly increase the ratio of replacement wetlands to lost wetlands and put a plan in place for incremental destruction of wetlands and aggressive development of replacement environments.

Another land use concern is related to increased flooding risks across the US resulting from climate change. Loss of wetlands and construction of acres of hard surfaces at the Micron site will increase flooding and runoff into the Oneida River and ultimately into Lake Ontario. In light of this, the DEIS should include an assessment of increased flooding risks to downstream communities and address how these risks will be mitigated.

Energy use – Operating the Micron plant will require enormous energy inputs. The DEIS doesn’t address how Micron will meet these needs and also meet its 100% renewable energy commitment. The final DEIS should provide a plan for generation or purchase of solar and wind power that will not rely on power already on the grid and being used by other customers and will not increase the cost of energy to households and other energy users. The final DEIS must also address the cost of any infrastructure changes needed to support its energy use in a way that ensures these costs will not fall to utility ratepayers or to New York State or Onondaga County taxpayers.

Water use – Operating the Micron plant will require enormous amount of water pulled from Lake Ontario. The final DEIS must address how these needs will be met and monitored while ensuring water availability and affordability to current users. The final DEIS must also address the cost of any infrastructure changes needed to support its water consumption in a way that ensures these costs will not fall to current customers or taxpayers.

Additionally, the DEIS does not adequately address: increased housing needs and costs (including the impact on current CNY residents), increased traffic and the investment needed in public transportation or increased public service demands.

If Micron is truly committed to CNY, it will ensure that all steps are taken to preserve the integrity of our environment and our community and will seek community engagement in all future decisions that impact our environment and community.

Thank you for the opportunity to comment.

Deborah Rose

110 Kensington Pl

Syracuse, NY 13210

---

**From:** Jamie Shinn <jeshinn@esf.edu>  
**Sent:** Monday, August 11, 2025 11:03 AM  
**To:** chipsnepa@chips.gov  
**Subject:** [EXTERNAL] RE: Draft Environmental Assessment EISX-006-55-CPO-001  
**Attachments:** img-2fe43498-b41d-4c1f-8fd2-6db1df10b175; Shinn\_Micron\_DEIS\_Comments.pdf

Dear CHIPS Program Office:

Attached please find my comments on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York.

Sincerely,  
Jamie Shinn

Jamie Shinn, PhD  
Associate Professor  
Dept. of Environmental Studies  
Marshall Hall 224  
SUNY College of Environmental Science and Forestry (ESF)  
Email: [jeshinn@esf.edu](mailto:jeshinn@esf.edu)  
Phone: 315-565-3022

August 8, 2025

Dear CHIPS Program Office:

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (DEIS) for Micron's proposed semiconductor manufacturing facility in Clay, New York. Despite the submission of the following comments, the 45-day public comment period does not give the public enough time to read and fully understand the 20,000-page report. The comment period must be extended to October 25, 2025, at a minimum, especially given there has been no public response to a petition signed by over 1500 residents of the region asking the same.

Despite the short turnaround to review the lengthy DEIS, I am submitting my comments based on my **expertise as an environmental social scientist, Associate Professor (with tenure) at the SUNY College of Environmental Science & Forestry, resident of Syracuse, and mother of a young child.** I will focus on just a couple of the key social issues that are insufficiently addressed in the DEIS. While I also have significant environmental concerns, I trust those are being addressed by other concerned residents.

Micron says in the DEIS that there are no environmental justice impacts from this project, nor does Micron provide a methodology for their study of environmental justice impacts that allowed them to arrive at this conclusion. Micron looks at the communities only within 5 miles of its main campus and a 1/2 mile from their rail spur, childcare center, and wastewater treatment plant expansion. They do not provide consistent analysis of both "Disadvantaged Communities" and low-income communities. Micron does not consider cumulative environmental impacts on communities. Micron does not consider environmental justice impact of connected actions which are numerous involving rail spur, highway interchanges, new water, electric and fossil fuel lines and transportation related to installation and operation of these connected actions.

In addition, Micron gives insufficient attention to the process of soliciting community feedback during the proposal. Of note, Micron only lists two meetings with a total of 45 people. Micron mentions a consulting Community Engagement Committee, but this consultation only related to Micron's financial commitments not environmental or community impacts.

Finally, the environmental justice impacts of the growth inducing impacts of Micron are only evaluated qualitatively and generally. They do not look at the income and EJ status of the communities receiving their wastewater and stormwater downstream, or their hazardous waste. Micron claims its contribution to climate change is a global and regional issue, and therefore not a local environmental justice issue.

In order for the Micron project to move forward, the following must be required of Micron:

- Micron should provide more details on how their Environmental Justice outreach process was determined and justification for this process and provide more detail and justification for how they choose the study area for their Environmental Justice review.
- Micron should be required to increase the area they evaluate for Environmental Justice impacts to include downstream communities, the Town of Clay, Liverpool, and parts of Syracuse, as well as communities within 5 (not .5) miles of their rail spur, childcare center, and water treatment plant expansion, and around planned roadway changes. Overall, Micron should expand their study area given that this is one of the largest development projects in NYS history.
- Micron must be required to provide more evidence that they engaged in robust public outreach, either during or beyond their two listed meetings with a total of 45 people. Micron should be required to engage in enhanced public participation because their project will have environmental justice impacts. This public participation should consider that many residents in EJ communities may face barriers to participation, including digital access, transportation, and language. Micron could engage in proactive outreach, including door-to-door engagement, community liaisons, and partnerships with trusted local organizations.
- Micron should quantitatively and specifically evaluate the long-term impacts of growth inducing effects on environmental justice.
- Micron must evaluate how their contributions to global warming will have adverse local effects and evaluate how these effects impact environmental justice.
- Micron should be required report on where waste from the project site will be transported to and evaluate the environmental justice impacts on these locations.
- Lastly, for the DEIS to be approved, Micron must be required to develop a community-expert advisory and oversight committee that can assist with ongoing and meaningful community engagement.

Thank you for your consideration of my comments.

Sincerely,

A handwritten signature in cursive script that reads "Jamie Shinn".

Jamie Shinn, PhD  
Associate Professor  
Department of Environmental Studies  
SUNY College of Environmental Science and Forestry  
315-565-3022  
[jeshinn@esf.edu](mailto:jeshinn@esf.edu)

**From:** [Jane Slabowski](#)

**Mail received time:** Tue, 12 Aug 2025 00:00:35

**Sent:** Mon, 11 Aug 2025 20:00:20

**To:** [chipsnepa](#)

**Subject:** [EXTERNAL] Micron

**Importance:** Normal

**Sensitivity:** None

**Archived:** Wednesday, August 13, 2025 12:08:15 PM

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Do not gloss over the environmental impacts of the Micron project.

1. Wetlands - what is proposed may be inadequate. I'm hearing 5:1 - preservation to destruction.
2. Water- the chemicals that will be used, some undisclosed, include at least some "forever" chemicals. The sheer volume of water that will be consumed is mind-boggling. I urge you to look deep ensure that every step is taken to prevent long-term damage to our CNY water supply. The Great Lakes are a regional resource that was tampered with once (think Lake Erie). Industry practically killed Onondaga Lake, and has cost millions to remedy. Let's learn from our mistakes.
3. The electricity that will be used by Micron is also mind-boggling. Is the infrastructure there? How can renewables be used and most effectively brought on-line? No smoke and mirrors please.
4. Housing and transportation. Ensure that the environmental costs of new housing and roads are factored in. Ensure that affordable housing is included in the projects that are developed. Ensure a plan for effective mass transport.

Micron is an opportunity. With opportunity comes risk. Please ensure that risks are mitigated. Pull in the best minds you can find to keep this project sustainable and not something that our children and grandchildren will look back upon, thinking it was a big mistake, and caused irreparable harm. We need jobs. We need development. But not at all costs.

Yours truly,  
Jane Slabowski

---

**From:** Anna Smith <[asmith@jobstomoveamerica.org](mailto:asmith@jobstomoveamerica.org)>  
**Sent:** Monday, August 11, 2025 8:14 PM  
**To:** [chipsnepa@chips.gov](mailto:chipsnepa@chips.gov)  
**Subject:** [EXTERNAL] Jobs to Move America Micron DEIS Comment\_EISX-006-55-CPO-001  
**Attachments:** Jobs to Move America\_Micron DEIS Comment\_Final Version.docx.pdf

To Whom It May Concern,

Please find attached Jobs to Move America's comment on Micron's DEIS.

Sincerely,  
Anna Smith



**Anna N. Smith** (she/her)  
Senior Researcher  
Jobs to Move America  
Brooklyn, New York  
M: 570-706-6512 | [JobsToMoveAmerica.org](http://JobsToMoveAmerica.org)  
[f](#) [t](#) [@](#) [in](#)

[Sign up for our newsletter!](#)



August 11, 2025

Re: Micron Draft EIS 2025 Comments  
Attn: Micron Project  
Onondaga County Industrial Development Agency (OCIDA)  
CHIPS Program Office (CPO)  
335 Montgomery Street, Floor 2M  
Syracuse, New York 13202  
chipsnepa@chips.gov

EISX-006-55-CPO-001

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## INTRODUCTION

Thank you for the opportunity to comment on the July 10, 2024 Draft Environmental Impact Assessment (DEIS) for the Semiconductor Manufacturing Project in Clay, New York proposed by Micron New York Semiconductor Manufacturing LLC (Micron) (a wholly owned subsidiary of Micron Technology, Inc.) (EISX-006-55-CPO-001) (Proposed Project).<sup>1</sup>

Jobs to Move America (JMA) is a strategic policy center that advocates for climate policies that center worker and community voice. Public investments in green technologies and critical climate infrastructure can create millions of good jobs, particularly for workers historically excluded from quality manufacturing jobs. At JMA, we believe public dollars should fuel a clean economy centered on good jobs. The DEIS raises several concerns. Jobs to Move America calls on the Department of Commerce (DOC) and Onondaga County Industrial Development Agency (OCIDA) to minimize health, safety, and environmental harms; protect workers; and maximize equitable quality-of-life and socioeconomic benefits for communities impacted by Micron's development in Central New York (CNY).

Micron has promised investments and thousands of good jobs for CNY in its efforts to obtain a \$20 billion subsidy, but to date has made no enforceable commitments to workers or communities to ensure the permanent jobs created are the quality jobs promised. In partnership with environmental, labor, and public health groups, JMA seeks to address this gap through the *Community Vision for Strong Environmental, Resident, and Worker Protections*.<sup>2</sup> This document was developed with local leaders and community organizations with expertise in public policy, environmental law, workforce development and safety, environmental and chemical science, energy technology and infrastructure, and housing and transportation equity.

Given the Proposed Project's scale and the range of potential impacts, we strongly urge the U.S. Department of Commerce and the Onondaga County Industrial Development Agency to extend the comment period to at least October 25, 2025, at a minimum. This request is further supported by a petition signed by over 1,500 residents of the region.<sup>3</sup> Despite the limited current comment period, we submit the following key environmental, social, and economic concerns, as well as mitigation recommendations, many of which are insufficiently addressed in the DEIS.

## CONTRIBUTORS

This comment was drafted with legal review and input from the law firm of Rupp Pfalzgraf, LLC (Albany Practice Group) as well as technical review and input from the following experts representing local

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<sup>1</sup> Which includes Micron's application for federal financial assistance (to Micron Technology) under the CHIPS incentives program and state financial assistance under the Green CHIPS Act.

<sup>2</sup> "Community Vision for Strong Environmental, Resident, & Worker Protections: Micron Environmental Review" 2025. Action Network.

[https://actionnetwork.org/petitions/community-vision-for-strong-environmental-resident-worker-protections-micron-environmental-review?source=direct\\_link&](https://actionnetwork.org/petitions/community-vision-for-strong-environmental-resident-worker-protections-micron-environmental-review?source=direct_link&)

<sup>3</sup> Mooney, Natalie. 2025. "Petition delivered to 'make Micron do right' on environmental review." *Spectrum News*, June 26.

<https://spectrumlocalnews.com/nys/central-ny/news/2025/06/26/advocates-deliver-petition-to--make-micron-do-right-on-environmental-review>.

environmental, labor, and community organizations with key concerns surrounding Micron’s Proposed Project in Clay, New York.<sup>4</sup>

**Rupp Pfalzgraf, LLC; Environmental Planning and Sustainability Practice Group, Albany, NY**

John L. Barone, Esq.

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24 Aviation Road, Suite 204

Albany, New York 12205

**Expert Contributors**

**Katherine Cohn, M.P.P.**.....Human Health and Safety  
*Policy Analyst, CHIPS Communities United*

**Donald J. Hughes, P.E., Ph.D.**.....Solid Waste, Hazardous Waste, And Hazardous Materials  
*Chemist*

**Rachel Kitchin, M.A.**.....Greenhouse Gas Emissions, Climate Change, and Climate Resiliency  
*Corporate Climate Researcher*

**Catherine L Landis Ph.D.**.....Wetlands & Wildlife  
*Science Advisor, SUNY Department of Environmental and Forest Biology*

**Madeline Nyblade, Ph.D.**.....Flooding  
*Assistant Professor, SUNY Department of Environmental Studies*

**Lenny Siegel**.....Solid Waste, Hazardous Waste, And Hazardous Materials  
*Executive Director Center for Public Environmental Oversight*

**EXECUTIVE SUMMARY**

This comment letter is submitted in relation to the Draft Environmental Impact Statement (DEIS) for the proposed Micron New York Semiconductor Manufacturing Project. Because this is a joint Federal and State DEIS, we understand that all comments submitted will be considered by both OCIDA and CPO.

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<sup>4</sup> See Appendix A for information on the experts' backgrounds.

Micron New York Semiconductor Manufacturing LLC (Micron) is a wholly owned subsidiary of Micron Technology, Inc. This comment letter analyzes the environmental impacts and risks of the Micron project and provides a technical assessment of environmental concerns. Specifically, as set forth in greater detail in the following sections, JMA and its experts outline the following issues with the DEIS and recommendations for a Final EIS.

## **DEIS Issues**

### **1. Wetlands, Wildlife, and Flooding**

#### **Wetlands Loss and Mitigation**

- **Extent of Loss** - 193.38 acres of wetlands will be permanently lost on-site, plus 78.86 acres from connected actions (rail spur, childcare center, wastewater expansion).
- **Ecological Value** - Wetlands filter pollutants, store carbon, buffer floods, and host threatened species. Loss releases stored carbon and methane, contributing to climate change—yet GHG effects from wetland destruction are omitted and should be assessed.
- **Mitigation Flaws** - Proposed mitigation sites are mainly farm fields, fragmented, and decades from full ecological function. Replacement ratios (~2:1) are inadequate; 10–15:1 is recommended (as done at Seneca Meadows).
- **Regulatory Compliance Concerns**  
It is unclear whether wetland delineations follow the new NYSDEC freshwater wetland regulations. Smaller wetlands and those of “local importance” may be undercounted. The wetland inventory should be updated to reflect the latest regulations.

#### **Wildlife Impacts**

- **Endangered Bats** - Indiana bat and Northern Long-eared bat populations are already near collapse due to white-nose syndrome. Habitat loss will impact roosting/maternity colonies; off-site mitigation is unlikely to replace lost habitat.
- **Other Species** - Threatened reptiles, amphibians, and grassland birds (Northern Harrier, Short-eared Owl) face habitat loss and fragmentation. Current mitigation (3:1 grassland replacement) is insufficient; 5:1 ratio and minimum mitigation parcel of 75 acres are recommended.
- **Aquatic Life** - Wetland/stream loss alters sediment, nutrient, and organic matter flow; may harm cold-water fish and macroinvertebrates.

#### **Flooding and Water Management**

- **Runoff Increases** - Project will replace permeable wetlands with ~645 acres of impervious surfaces, increasing stormwater runoff and downstream flood risk. Rail spur, childcare center, and wastewater plant runoff not fully quantified.

- **Dewatering** - Long-term groundwater lowering during construction could drain nearby wetlands/streams.
- **Wastewater Discharge** - Full buildout will discharge ~40 MGD treated water vs. current 6 MGD, increasing downstream flooding risks.

## 2. Utilities, Energy, and GHG Emissions

- **Massive Resource Demands** – Micron will consume ~15,674 GWh/year (≈11% of NY’s total 2023 electricity use) and 48 million gallons of water/day. New natural gas line construction and the massive increase in greenhouse gas emissions from electricity generation, induced development, and on-site emissions raise serious CLCPA compliance concerns.
- **Cost Burden Risks** – Upgrades to power, water, and wastewater systems could shift costs to ratepayers; cost responsibility remains unclear.
- **GHG Emissions** – Projected to release 881,699 metric tons CO<sub>2</sub>e/year from process gases, plus fugitive heat transfer fluids onsite. Induced development will release considerably more offsite. Purchase of Renewable Energy Credits (RECs) is not effective mitigation for GHGs resulting from all these emissions sources, including the electricity generation necessary to supply the plant’s electricity demand and . Instead, Micron must bring new renewable energy generation online.
- **Grid & Climate Goals Impact** – Load increase will slow or reverse NY’s progress toward 70% renewable energy by 2030 and 100% zero-emissions by 2040. Without effective mitigation that includes construction of new renewable energy generation this load increase will cause prolonged fossil fuel dependence and could impact reliable electricity supply for the region.
- **Recommendations** – Require 24/7 matched renewable power from new generation; eliminate unbundled RECs; implement load flexibility; fully disclose cost allocations; expand local renewable generation.

## 3. Solid Waste, Hazardous Waste, and Hazardous Materials

- **Chemical Identification Gaps** - The DEIS lacks a comprehensive list and quantities of hazardous chemicals used by Micron. Without this, public agencies cannot assess health, safety, or environmental risks. Industry norms (e.g., NIST, CHIPS PEA) provide far more chemical detail.
- **PFAS (“Forever Chemicals”)** - Micron’s PFAS disclosures are incomplete, omitting most of the hundreds of PFAS types used in semiconductor manufacturing. Current regulations only cover PFOA and PFOS, which the industry no longer uses. PFAS in wastewater, even after treatment, can bioaccumulate and persist in Lake Ontario, potentially impacting drinking water.
- **Wastewater Treatment Risks** - The proposed treatment methods (reverse osmosis, nanofiltration, activated carbon, ion exchange) filter but do not destroy PFAS. Testing methods only detect ~40 PFAS types, while hundreds may be present. Non-target PFAS may exceed

known ones in concentration. Micron should use advanced treatment methods that actually destroy PFAS.

- **Off-Site Disposal Issues** - Off-site incineration risks creating toxic byproducts and often occurs in EJ (environmental justice) communities. Micron has not guaranteed destruction of PFAS and other hazardous compounds.
- **Extremely Hazardous Substances** - The DEIS names only eight regulated chemicals, omitting others like arsine and phosphine. Local emergency response capacity for these hazards is unclear. Dispersion modeling needs to be done to ensure childcare and other facilities are sufficient distances from chemical storage areas in the event of an accidental release.
- **Storage, Spill, and Transport Risks** - Over 55 million gallons of hazardous liquids and petroleum could be stored on site. Truck transport increases spill risk; rail transport should be considered.
- **Cumulative Impacts** - The DEIS does not assess combined PFAS, GHG, and hazardous substance releases from Micron and other anticipated regional industrial growth.
- **Recommendations** - Identify all hazardous substances and PFAS types/quantities; require zero PFAS discharge, using destruction technologies; increase transparency on waste destinations and treatment; include dispersion modeling for toxic gas releases; evaluate regional cumulative impacts and update the EIS periodically.

#### 4. Human Health & Safety

- **Chemical Transparency Gaps** – No full chemical inventory; PFAS use acknowledged but not comprehensively addressed; lack of enforceable hazardous waste procedures before operations start.
- **Worker Protection Shortfalls** – No job-specific risk assessments, reproductive/developmental hazard protections, or public illness data. Disparity between detailed construction contractor EHS plans and minimal operational worker protections. Not clear if temporary workers will get the same protections.
- **Community Risk** – Limited public access to safety plans; no community hazard notification system; hazardous waste handling plans delayed and lacking public oversight.
- **Recommendations** – Require public disclosure of all chemicals and PFAS; adopt zero-PFAS release goal; produce detailed operational EHS plans; publish safety plans; provide ongoing, disaggregated exposure and health reporting.

#### 5. Transportation & Traffic

- **Public Transit Gaps** – No current bus routes connect Syracuse’s low-income neighborhoods to the Micron site; nearest Centro stop is ~4 miles away. Potential Bus Rapid Transit (BRT) expansion is described only as “potential,” with no timelines or funding commitments.

- **Equity Impact** – Without reliable, affordable transit, many disadvantaged residents cannot access jobs. No modeling of commute times from low- and moderate-income neighborhoods.
- **County Plan Misalignment** – Onondaga County’s comprehensive plan calls for transit-oriented development, but Micron offers no commitment to public transit expansion.
- **Recommendations** – Fund robust BRT and shuttle networks; coordinate with Centro; ensure 24/7 service for all shifts; align with county and regional sustainability goals; assess impacts of new highway interchanges.

## 6. Workforce & Socioeconomic Impacts

- **Job Quality Concerns** – Publicized \$100k average pay obscures disparities (technicians ≈\$68k; many roles below \$100k); high CEO-to-worker pay ratio; limited jobs opportunity for those without advanced degrees.
- **Local Hiring Equity** – Vague commitments for permanent jobs; unclear if there is prioritization of Syracuse residents who face the highest poverty rates.
- **Training Gaps** – Apprenticeship and on-the-job training programs lack detail, targets, and enforceable inclusion for underrepresented groups. No clear advancement pathways or ongoing upskilling commitments.
- **Work Conditions** – Demanding 11.5-hour shifts with minimal fatigue management details; concerns over promotion barriers and low wage growth in comparable facilities.
- **Economic Risks** – Risk of creating many low-wage spinoff jobs in retail/hospitality; potential to exacerbate inequality.
- **Recommendations** – Enforceable local hire targets; transparent pay ranges; targeted recruitment in high-poverty census tracts; detailed training/advancement plans; quarterly workforce reporting; penalties for non-compliance; binding Community Benefits Agreement (CBA) with community oversight.

## 7. Housing Impacts

- **Severe Market Strain** – Micron’s projected in-migration (64,000 people; 27,000+ new housing units needed) will significantly stress an already overheated housing market in Syracuse and Onondaga County. Median rents are already 40% above what typical renters can afford; home prices rose 85% from 2012–2023.
- **Underestimated & Contradictory DEIS Claims** – The DEIS claims no significant housing impact while also admitting major pressures including rent hikes, possible displacement, and market changes not seen since the 1970s.
- **Inadequate Mitigation Plans** – Current housing developments (≈5,800 units) fall far short of projected needs, with little affordable housing included. Syracuse—the highest-need area—is largely left out of development plans.

- **Equity & Infrastructure Concerns** – High poverty rates, racial segregation, and poor housing quality (lead, code violations) will worsen without targeted interventions.
- **Recommendations** – Require enforceable plans for affordable, mixed-income, climate-friendly housing; use “smart growth” principles; detail specific funding/subsidy programs; tie housing expansion to GHG reduction measures.

## 8. Environmental Justice

### Geographic Scope and Impact Analysis

- **Flawed Study Area** - The DEIS limits Environmental Justice (EJ)/Disadvantaged Communities (DAC) analysis to a 5-mile radius, improperly excluding Syracuse neighborhoods within 10 miles that may face air, water, and economic impacts.
- **Cumulative Impact Gaps** - Does not integrate hazardous materials, PFAS, GHG emissions, or induced industrial growth effects on disadvantaged communities.

### Human Health & Safety

- **Water Quality Risks** - PFAS and hazardous waste could contaminate drinking water sources affecting DACs, especially those with existing lead pipe issues.
- **Waste Disposal Risks** - Off-site disposal may shift pollution burdens to EJ communities.

### Air Quality

- **Flawed Baseline** - Relies on monitoring from Rochester (70+ miles away). No plan to assess local air pollutant impacts on DACs or during upset conditions.

### Inadequate Community Engagement

- **Flawed Outreach** - Minimal public meetings (two, 45 attendees total) and lack of substantive EJ-specific outreach. Engagement tied mostly to financial commitments, not environmental impacts.

### Housing & Growth-Induced Effects

- **DACs Impact Omitted** - Worker in-migration may raise rents and housing costs, disproportionately impacting DACs. Mitigation relies on speculative future housing stock without guarantees of affordability.

### On-Site Childcare

- **Danger from Accidental Releases** - While beneficial, its proximity to industrial hazards could pose disproportionate risks to low-income children. No modeling provided for gas release or flood-related contamination risks.

**Recommendations:** Expand EJ analysis radius to at least 10 miles. Require transparent environmental monitoring overseen by community boards. Develop enforceable Community Benefits Agreement including environmental and housing protections. Disclose and regulate waste destinations to avoid burdening other EJ communities.

## 9. Cross-Cutting Themes

- **Environmental Justice** – Low-income and marginalized communities face disproportionate risks from housing displacement, job inaccessibility, pollution, and infrastructure cost burdens.
- **GHG Impacts** – The Micron facility will generate GHGs on site and off site from many different sources, including on site combustion, on site release of organic chemicals, off-site electricity generation, wetland destruction, transportation, and induced growth. These emissions must be assessed together and mitigated so that New York’s mandatory climate goals are not violated.
- **Transparency & Accountability** – Across all areas, the DEIS lacks enforceable commitments, specific timelines, and public oversight mechanisms.
- **Community Benefits Agreement** – Advocated as a central tool to make commitments binding, create measurable objectives, and ensure ongoing community and worker participation in oversight.
- **Toxic chemicals** – The release of toxic chemicals, including PFAS, could have a detrimental impact on human health, wildlife and the environment. Greater clarity must be provided on how Micron proposes to manage this issue.

## Additional Legal Issues

The expert commenters have pointed to many deficiencies in the DEIS that must be addressed before it can be finalized. There are several additional issues that warrant attention.

### *Alternatives*

The analysis of alternatives is flawed. OCIDA previously assessed the anticipated significant adverse impacts associated with use of the Project site for a similar but smaller development footprint, accepting a Final Supplemental Generic Environmental Impact Statement on July 16, 2021 (FGEIS) and the issuance of a SEQRA Findings Statement on July 27, 2021. The current DEIS did not consider alternative sites, relying instead upon the prior analysis. It also dismissed a two fab alternative, claiming that a four fab facility is economically essential for Micron.<sup>5</sup> This contention is undercut by Micron’s approach in Boise, Idaho where it is building a two fab factory to produce advanced memory chips.<sup>6</sup> If a two fab facility is economic in Idaho, it should also be economic in New York. This means the analysis of alternatives is fundamentally flawed. Two two-fab facilities would create very similar economic benefits for New York

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<sup>5</sup> DEIS at 2-46. <https://ongoved.com/wp-content/uploads/2025/06/Micron-Draft-EIS.pdf>

<sup>6</sup> Micron Press release dated June 12, 2025 available at

<https://investors.micron.com/news-releases/news-release-details/micron-and-trump-administration-announce-expand-us-investments>.

but would lower the risk of overwhelming the local housing and labor markets. A two-site approach would also be likely to have less impact on wetlands.

Micron is applying for a Section 404 wetlands permit. 218 acres of the 408 acres on the site are to be filled. All parties have acknowledged that the chip plant is not a water dependent use. Therefore, a 404 permit can only be issued if there are no alternatives and mitigation is provided. The flaw in the analysis of alternatives means that a showing of no alternatives cannot be made at this time.

### ***Climate Leadership and Community Protection Act***

This proposal also raises significant concerns about compliance with the Climate Leadership and Community Protection Act (“CLCPA”), and the Green Amendment to New York’s constitution. Section 7(2) of the CLCPA requires New York State agencies to consider whether administrative decisions, such as permitting actions, are inconsistent with or interfere with the statewide greenhouse gas emission limits set by the law. If an agency's decision is inconsistent with the statewide greenhouse gas emission limits under the CLCPA, a detailed justification is required. If a justification is available, the agency must identify alternatives or greenhouse gas mitigation measures. Furthermore, section 7(3) of the CLCPA requires that decisions made by State agencies do not disproportionately burden Disadvantaged Communities (“DACs”). So far, the DEIS has placed unjustifiable reliance on purchasing Renewable Energy Credits (“RECS”) but has failed to provide a valid justification of why New York should make its effort to comply with an already challenging CLPA almost impossible.

### ***Green Amendment***

Finally, the concerns regarding PFAS and hazardous chemicals may give rise to a claim under the Green Amendment as part of the SEQRA process if the lead agency does not pursue proper assessment of this issue, in which the DEIS analysis is inadequate. On November 2, 2021, New Yorkers voted in favor of an amendment to the New York State Constitution under Article 1 Section 19 “Environmental rights” (the “Green Amendment”). N.Y. Const., Art 1, §19; LON Compl. ¶¶ 129-142. Taking effect in January 2022, the State Constitution was revised to include a right to a clean and healthy environment through what has been called New York’s Green Amendment. *Id.* The Green Amendment guarantees, as of January 1, 2022, that “[e]ach person shall have a right to clean air and water, and a healthful environment.” *Id.* New York’s Green Amendment is an affirmative right, because it is included in the State’s Bill of Rights.<sup>7</sup>

The Green Amendment received overwhelming support by New York State voters. By passing the Green Amendment, the people of New York mandated the State government provide a clean and healthy environment to all New Yorkers and made plain that the State must go beyond existing environmental laws to vindicate the new right. *Fresh Air for the Eastside, Inc. v. The State of NY, et al.*, NY Slip Op 34429(U) (Index No. E2022000699) (Sup. Ct. Cnty. of Monroe, Dec. 7, 2022). In effect, the right can be regarded as gap filling. It ensures that government entities are obliged to provide the clean and healthy environment guaranteed by the Constitution even when existing environmental laws fail to do so. Where necessary, New Yorkers can now turn to the Green Amendment to obtain such an environment.

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<sup>7</sup> Stacy Halliday et. al., 2021. “New York Becomes the Third State to Adopt a Constitutional Green Amendment,” *Bridge & Diamond*, December. 10.  
<https://www.bdlaw.com/publications/new-york-becomes-the-third-state-to-adopt-a-constitutional-green-amendment/>

As a recently enacted Constitutional provision, the Green Amendment poses some novel legal issues, but New York Courts have already made some helpful interpretations. For example, the Green Amendment has been found to be self-executing. *Id. See also, People v. Carroll*, 3 N.Y.2d 686 (1958) (finding that “[t]he general rule is that constitutional provisions are presumptively self-executing.”). In addition, the State has a nondiscretionary obligation to comply with the New York Constitution and, thus, the State must ensure that its citizens have the right to clean air and a healthful environment. *See Fresh Air for the Eastside* (finding that “[c]omplying with the Constitution is not optional for a state agency and is thus nondiscretionary and ministerial,” that the “State must ensure that its citizens have the right to clean air and a healthful environment” and that courts are “fully entitled to compel the State to comply with the Constitution”). This finding is consistent with prior opinions finding that a government agency must comply with the Constitution as a mandatory, nondiscretionary duty. *See, D.J.C.V. v. United States*, 2022 WL 1912254, at 16 (S.D.N.Y., June 3, 2022); *Finn’s Liquor Shop v. State Liquor Authority*, 24 N.Y.2d 647, 655 (1969).

Subsequently, in a separate case, a court noted that the Green Amendment has changed the standard of review for permitting decisions. *Marte v. City of New York*, 2023 N.Y. Slip Op 31198 (Sup. Ct. 2023). Not only must such decisions be rational, they must also comply with the requirements of the Green Amendment. *See id.* The vagueness of the current commitments regarding PFAS would raise a colorable claim under the Green Amendment.

## **WETLANDS & WILDLIFE**

The Micron site contains 409 acres of wetlands according to federal delineation. These wetlands include high-quality red maple swamps, hemlock–hardwood swamps, floodplain forests, and dogwood and willow shrub swamps. They host abundant native species that support insects and the interconnected food web. Construction of Micron’s megafab will result in the permanent loss of 193.38 acres of wetlands on the project site. An additional 78.86 acres will be lost due to the construction of the rail spur, childcare center, and wastewater treatment plant expansion.

The proposed campus poses significant ecological risks due to the permanent destruction of wetland habitat. Wetlands provide habitat for more than one-third of the country’s threatened and endangered species, filter pollutants, and buffer communities from flooding. They also store large amounts of carbon, making them powerful tools in combating climate change. According to the DEIS, “Construction of the Proposed Project would result in the direct loss of wetlands and their functions and services from site development. In addition, wetland buffers (typically 100 feet from the edge of a wetland in New York State) would be lost.” (p. 3-72).

To offset these adverse impacts, Micron has proposed restoring some wetlands through a mitigation plan managed by The Wetland Trust (TWT). However, there are outstanding concerns that the DEIS does not adequately address regarding potential impacts:

- Importance of the lost wetlands to the local environment;
- Potential impacts on flooding and surface flow through adjacent roadways and residential areas;
- Compliance with New York State Freshwater Regulations;

- Impacts on endangered animal populations native to White Pine Commerce Park (WPCP); and
- The need for a mitigation plan that restores degraded wetlands or creates new wetlands at a much higher ratio to compensate for all the wetland benefits lost.

Wetlands are essential to human health and the environment. They provide habitat for a significant number of threatened and endangered species, filter pollutants, and protect communities from floods. They also store large amounts of carbon—300 acres of freshwater wetlands can store approximately 305,000 metric tons of carbon dioxide, equivalent to the annual emissions of about 66,000 cars.<sup>8</sup>

In addition to direct wetland destruction, the proposed campus will increase impervious surfaces, which could indirectly harm wetlands and other habitats through increased stormwater runoff and reduced groundwater recharge. For example, the DEIS states that “11,600 parking spaces, four bus stops, and seven access roads would be constructed on the campus, including four 500-space surface parking lots.” (Table 2.1-3, p. 2-13.).

Micron has not accounted for the loss of carbon sequestration from wetland destruction in its greenhouse gas emissions evaluation. Destroying these wetlands will release stored carbon dioxide into the atmosphere and remove future storage, further contributing to climate change.<sup>9, 10</sup> This release of CO<sub>2</sub> is not accounted for in Micron’s DEIS. According to the EPA and peer-reviewed literature, drained freshwater wetlands in temperate regions can release approximately 3–10 metric tons of methane (a potent greenhouse gas) per hectare over the short term following destruction (via oxidation and disturbance).<sup>11</sup> The destruction of wetlands by the proposed project will further exacerbate climate change. The final EIS must include an analysis of how wetland loss will impact GHG emissions.

### **Wetland Mitigation Work Plan**

In its mitigation plan, Section 4.1 (Selection and Design Criteria) of the DEIS, Micron claims that “Work areas contain few, if any, existing wetlands, which allows for focus on reestablishment and are near or adjacent to existing Department of Environmental Conservation (DEC) wetlands. Delineated wetlands will be subsumed into the work area and will be either registered as rehabilitation if the area is marginal, which is usually the case, or will otherwise be subtracted from the total acreage built and corresponding credits generated. The agencies decide which option is selected.”

The Wetland Trust’s (TWT) Mitigation Project Overview notes that wetland mitigation sites are “in active soybean production. The sites will stay in active agriculture until construction commences, which helps prevent invasive species and incompatible land uses.”<sup>12</sup> The fact that a majority of the proposed wetland mitigation sites are currently active soybean fields means it could take decades for created wetlands in these fields to provide similar ecological services to the present wetlands. Even then, studies show that

<sup>8</sup> The Climate Trust, “Blue Carbon Rising,” (2025): <https://climatetrust.org/news/blue-carbon-rising/>.

<sup>9</sup> A.M Nahlik & Fennessy, M.S. 2016. “Carbon storage in US wetlands.” *Nature*. December 13. <https://www.nature.com/articles/ncomms13835>.

<sup>10</sup> Robert T. Watson *et al.* 2014. “Land-Use Change, and Forestry.” *Cambridge University Press*. September.

<sup>11</sup> Scott D. Bridgman *et al.* “The Carbon Balance of North American Wetlands.” *Wetlands*. December 2006. <https://repository.si.edu/server/api/core/bitstreams/c49bc76c-8dc1-4c12-aef2-db77d449d4d5/content>.

<sup>12</sup> “Micron Central New York Semiconductor Manufacturing Complex: Overview of Stream/Wetland Mitigation Plan,” The Wetland Trust, Inc., (2025): [https://ongoved.com/wp-content/uploads/2025/06/Micron-Draft-EIS-Appendix\\_F\\_Vol\\_3.pdf](https://ongoved.com/wp-content/uploads/2025/06/Micron-Draft-EIS-Appendix_F_Vol_3.pdf).

restored wetlands rarely reach the full functional capacity of original wetlands.<sup>13</sup> The mitigation sites are also located closer to sources of disturbance (roads, farms, and homes) than the existing wetlands.

The mitigation sites are smaller and more isolated compared to the integrated network of forests, grasslands, and wetlands at the Micron site (Fig. F-3). The DEIS fails to account for the loss of intact wetlands that will be replaced with fragmented areas that are currently severely degraded or in agricultural use.

A large-scale meta-analysis by Moreno-Mateos et al. of 621 restored or created wetlands worldwide found that, even up to 100 years after restoration, biological structure (primarily plant communities) remained about 26% lower and biogeochemical function (driven by soil carbon storage) about 23% lower than undisturbed reference wetlands. The authors conclude that current restoration practices are often unable to fully recover the original ecosystem functions, even after a century.<sup>14</sup> To address these concerns, regulators should require Micron to purchase large tracts of existing wetlands (especially forest and shrublands), particularly floodplain forest along the Oneida River. These areas should be permanently protected by TWT or the CNY Land Trust.

The DEIS also notes that 78.86 acres of wetlands and surrounding rivers and streams will be impacted by future connected actions (p. 3-66). However, jurisdictional determinations have not yet been issued for most of these features, with the exception of the Clay Substation (USACE only)” (p. 3-67). The DEIS claims that “non-jurisdictional wetlands present within the LODs cannot be determined at this time because not all of the LODs have been delineated. Except as described below for the proposed Clay Substation expansion area, functional analyses of wetlands within the remaining Connected Action LODs also have not yet been conducted, for various reasons, including because field delineations have not yet been performed, wetlands have yet to be assessed by USACE or NYSDEC, or losses of jurisdictional wetlands within the remaining LODs are anticipated to be negligible.” ( p. F-18). All sites must be evaluated before construction begins so that impacts can be monitored over time. The final EIS should include a comprehensive analysis of the total impact on wetland function, wildlife, and plant communities over the entire construction period.

Given the direct, indirect, and cumulative impacts—such as subsidiary development predicted to occur in the watershed—it is recommended that the wetland replacement ratio be increased from approximately 2:1 to between 10:1 and 15:1, similar to the Seneca Meadows restoration project.<sup>15</sup> (see Seneca Meadows Wetland Restoration Design-Build Mitigation for Landfill Impacts to Wetlands).

### **Compliance with New York State Freshwater Wetlands Regulations**

Micron is required to comply with New York State’s new freshwater wetlands regulations.

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<sup>13</sup> David Moreno-Mateos *et al.* The Wetland Trust, Inc., “Structural and functional loss in restored wetland ecosystems.” *PLoS Biology*, 10(1), The Wetland Trust, Inc., (2012):

<https://journals.plos.org/plosbiology/article?id=10.1371/journal.pbio.1001247>.

<sup>14</sup>David Moreno-Mateos *et al.* 2012.

<sup>15</sup>RES. N.d. “Seneca Meadows Wetland Restoration Design-Build Mitigation for Landfill Impacts to Wetlands.”

<https://res.us/projects/seneca-meadows-wetland-restoration-design-build-mitigation-for-landfill-impacts-to-wetlands/>.

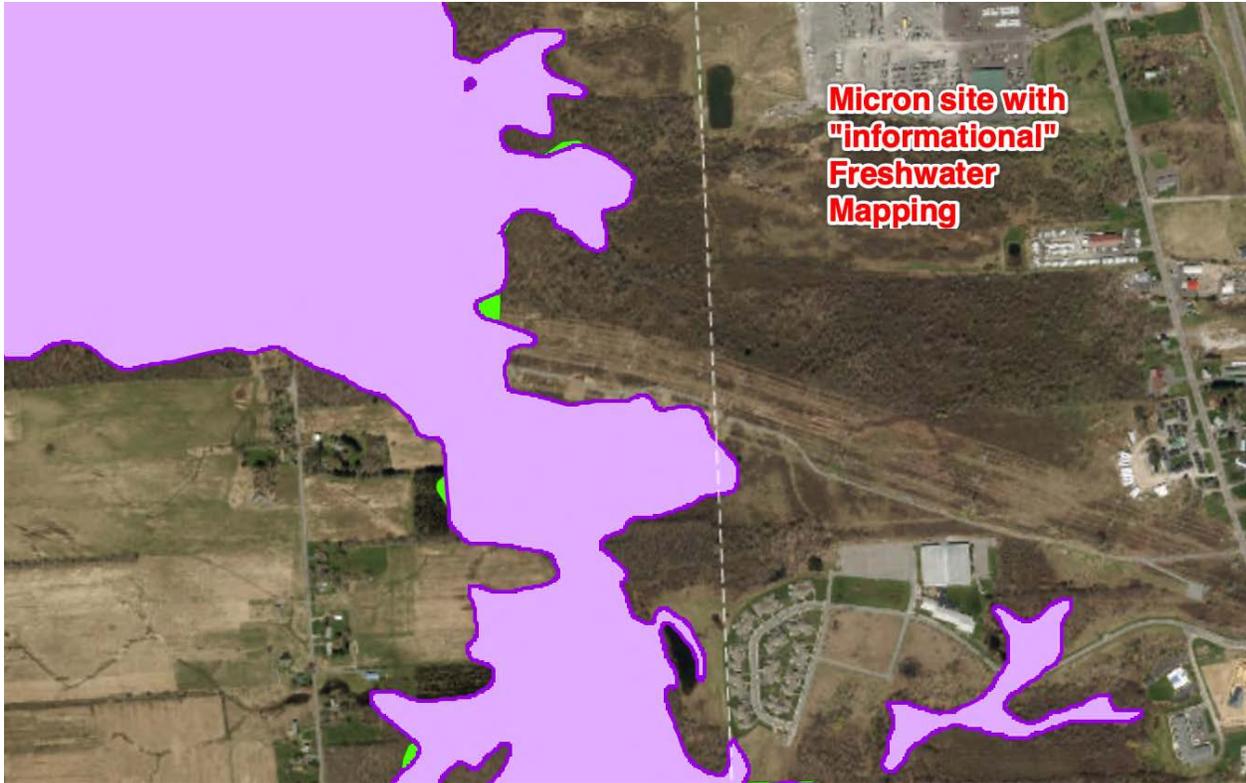
Micron’s current determination of impacted New York State jurisdictional wetlands and its compliance with the new state freshwater regulations remains unclear. In 2021, Micron hired Ramboll Americas Engineering Solutions, Inc. (Ramboll) to identify wetlands types and acreages that should be included under both the U.S. Army Corps of Engineers (USACE) and New York State’s permitting authority. The DEIS includes tables, charts, and maps that largely reflect information from old DEC jurisdictional paper maps confirmed through surveys and determinations issued by NYSDEC under ECL Article 24. It also includes approved jurisdictional determinations from USACE and categories of non-jurisdictional wetlands, which Ramboll describes as “definitively excluded from Federal and State jurisdiction.”

The DEIS does not explain the criteria Ramboll used to exclude certain wetlands from permitting protection. While it acknowledges wetlands permitting reforms passed by the State Legislature in 2022 and the subsequent regulations for freshwater wetlands that became effective on January 1, 2025 (DEIS appendix F-2.2), it remains unclear whether Micron is applying the old or the new rules in deciding which wetlands merit protection. Under the former law, state-jurisdictional wetlands were only those shown on approved maps measuring 12.4 acres or more. If a wetland was not on a map, its destruction required no state permit. The new law requires permits for any wetland, regardless of mapping status, and covers wetlands smaller than 12.4 acres (7.4 acres after 2028) if they meet certain criteria, such as attenuating significant flooding, filtering drinking water, providing rare species habitat, or being located in an urban area.

The Generic Environmental Impact Statement (GEIS) (Appendix F V-1 P-1) notes that Micron’s campus was evaluated for potential federal- and state-regulated wetlands by Ramboll biologists in the fall of 2021, summer of 2022, and the spring, summer, and fall of 2023. Site visits were also conducted in the spring, summer, and fall of 2023 and the spring of 2024 with USACE Buffalo District and NYSDEC Region 7 personnel to observe, verify, and supplement the delineations conducted by Ramboll.

It is unclear if the delineations happened before or after the legislative reforms were enacted in 2022, or if the delineations and site advisories happened, before the release of the final regulations in December 2024. It is also unclear whether the delineations meet the new law’s requirements. The DEIS does not mention identifying smaller wetlands of “unusual importance” or mapping vernal pools—two critical elements under the new rules.

The GEIS indicates that certain jurisdictional determinations were signed off by DEC staff in February 2024, while others remain pending in 2025. Proceeding with a wetlands protection and mitigation plan under outdated standards would leave portions of the impacted landscape without the protections afforded by the new law. The DEIS suggests that state jurisdictional determinations were based on historic delineations shown in green on DEC Environmental tracker. It is wholly inappropriate to create a wetlands protection / mitigation plan for the entire Micron complex with some of the wetlands unprotected due to the weaknesses of the old law.



The wetlands in purple depict “informational wetlands” where DEC predictive mapping identifies potential locations for jurisdictional wetlands, beyond what was originally mapped.

Ramboll compiled lists and maps of wetlands deemed “non-jurisdictional,” likely because they were not on official maps or did not meet the federal “significant nexus” test to Waters of the United States. Without clear standards, it is uncertain whether all wetlands covered by the 2025 regulations have been identified or whether the count was constrained by outdated rules. This is a key deficiency for both the 404 permit and the DEIS.

In total, the Micron project is projected to result in the permanent loss of about 193.38 acres of federal-jurisdictional wetlands, which overlap with about 174.77 acres of state-jurisdictional wetlands. The company acknowledges about 10.5 acres of impacted non-jurisdictional wetlands and intends to compensate for their loss through mitigation, resulting in roughly 210 acres of total wetlands loss. State jurisdictional wetlands require protective 100-foot buffers, yet it is unclear whether non-jurisdictional wetlands or undercounted state wetlands will receive these higher protections or be held to outdated less protective standards.

Micron’s publicly subsidized proposal has been presented as a project that will both uplift New Yorkers and advance technology, but it cannot meet its public obligations if it avoids the full requirements of the updated environmental review process by shielding its wetlands obligations from the new law.

Micron and DEC must clarify through the EIS process that the project will not be exempt from the new freshwater regulations effective January 1, 2025.

A revised wetlands protection plan must include a clear statement that the Micron project will comply with the 2025 wetland regulations and a full analysis of all wetlands on the project regardless of size, and consideration of all wetlands larger than 7.4 acres<sup>16</sup> as state-jurisdictional with associated buffers, protections, and mitigation. It should also include a review of wetlands smaller than 7.4 acres to determine if they meet “Local Importance” criteria, especially given the potential for endangered species on the Micron property.

### **Biological Resources – Wildlife and Endangered Species**

White Pine Commerce Park (WPCP), the location chosen for Micron’s megafab, is home to three federally and state-listed endangered species: the Sedge Wren, the Indiana Bat, and the Northern Long-Eared Bat. A 2023 study found that the number of Indiana bats detected on site suggests the presence of a summer maternity colony, where females give birth to and raise their young.<sup>17</sup> These species are protected under both the U.S. Endangered Species Act and the New York State Endangered Species Act.<sup>18</sup> The site also lies within the range and provides potential habitat for other endangered or threatened species, including the American Hart’s-Tongue Fern, the Bog Turtle, and the Eastern Massasauga Rattlesnake.<sup>19</sup> Both the American Hart’s-Tongue Fern and the Bog Turtle are dependent on particular types of wetlands or wet forest habitats. Even if these species are not currently present on the Micron property, construction will eliminate areas suitable for their survival, thereby shrinking their already limited habitat range.

Community members in the Syracuse area have voiced concerns that Micron’s development will harm endangered bat species. Micron has stated it will delay certain construction activities until November to avoid disturbing bats during the warmer months when they roost in trees before retreating to hibernacula in caves in the fall. However, the loss of over 500 acres of trees, including nearly 100 acres of forested wetlands, will create long-term harm to these populations. While Micron plans to purchase land off-site to replace destroyed bat habitat, this measure will not undo the damage to hundreds of bats that rely on WPCP for summer roosting and especially for maternity colonies.

State and federal agencies should require stronger mitigation measures to protect these vulnerable species, along with the hundreds of other animals whose habitats include the wetlands of WPCP. <sup>20</sup>The final EIS must include:

- Greater consideration for reptiles and amphibians, such as provisions for road crossings and vernal pool protections in line with recent state legislation;

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<sup>16</sup> As of January 1, 2028, the threshold will decrease to 7.4 acres (3 hectares). NYDEC.N.d. “Freshwater Wetlands Program.” <https://dec.ny.gov/nature/waterbodies/wetlands/freshwater-wetlands-program>.

<sup>17</sup>Coin, Glenn. 2024. “One more reason Micron is waiting until fall to break ground in Clay: endangered bats.” *Syracuse.com*, February 27.

<https://www.syracuse.com/business/2024/02/endangered-bats-on-micron-site-in-clay-are-one-reason-chip-maker-aims-to-break-ground-in-november.html#:~:text=The%20presence%20of%20the%20bats,into%20hibernation%20in%20nearby%20caves>.

<sup>18</sup> Ibid.

<sup>19</sup>Central New York Regional Planning and Development Board. N.d. “ON-11: White Pine Commerce Park Route 31 and Caughdenoy Road.” [https://www.cnyrpd.org/programs/ecdev/SiteProfiles/v2\\_ON-11.pdf](https://www.cnyrpd.org/programs/ecdev/SiteProfiles/v2_ON-11.pdf).

<sup>20</sup> Coin, Glenn. 2024.

- Wildlife corridors;
- Require conservation housing to reduce habitat loss due to subsidiary development;
- Require native plant landscaping both on the Micron site and in related developments). Native plant nurseries should be supported to counteract regional habitat loss;
- Additional protections should extend to creek habitats supporting mussels, fisheries such as sturgeon, and floodplain forest, etc.
- The plan should also incorporate native plant rescue and seed collection, including large tree relocation;
- Connected Actions - such as breeding disruption, habitat loss, carbon storage reduction, and greenhouse gas emissions—must be more thoroughly addressed.

#### *G-3.5.1 Indiana Bat*

The Indiana Bat, listed as endangered at both state and federal and state level (p. 3-123). is present on the Micron campus. The DEIS states that “The Micron Campus site and the Rail Spur Site are within 1 mile of a known Indiana bat maternity roost, within 3 miles of other known Indiana bat roost trees and capture locations, and within 14 miles of a known hibernaculum.” (p.G-63). The DEIS reports severe population declines in Indiana Bat populations due to white-nose syndrome (WNS), a fungal disease first documented in the Howe Caverns in New York in 2006 (Cheng et al. 2021; Reeder and Moore, 2013).” (p. G-63). In particular, the draft states that, “In New York State, pre- and post-WNS count data on hibernating Indiana bats showed an average statewide population decline of 72 percent between 2006 and 2011 (Turner et al. 2011).” (p.G-64) and that “Declines in New York State since the introduction of WNS have been among the most severe of all monitored states and are approaching 100 percent (Cheng et al. 2021).” (pdf page 64).

#### *G-3.5.1 The Northern Long-Eared Bat*

The Micron campus is also home to the Northern Long-eared Bat, which is listed as an endangered species at both the federal and state level. Like the Indiana Bat, the Northern Long-eared Bat has experienced a steep population decline in recent years. According to the DEIS “The northern long-eared bat has experienced the steepest population decline of the six species of bats in the northeast that are affected by WNS, with numbers at monitored hibernacula in several states dropping by an average of 98 percent between 2006 and 2011 (Langwig et al.2012; Reeder and Moore, 2013; Turner et al. 2011) and approaching 100 percent in the years since (Cheng et al. 2021). Ninety percent of hibernacula where northern long-eared bats are still found contain fewer than 10 individuals (Cheng et al. 2021). In New York State, pre- and post-WNS count data from 18 northern long-eared bat hibernacula showed local population extinction at all but 4 of the sites as of 2011 and suggested an average statewide population decline of 97 percent (Turner et al. 2011). Surveys at these 18 hibernacula in New York State during the winter of 2012-2013 found only 14 Northern Long-eared bats where there had previously been more than 1,100 before WNS (Niver, 2015).” (p. G-65–66).

### G-3.5.1 The Tricolored Bat

The DEIS also lists the Tricolored Bat as a species with the potential to be found on the Micron Campus and notes that the Tricolored Bat is “a species proposed to be listed as endangered under the ESA.” (p. G-65). The DEIS notes that, “The tricolored bat has experienced local population declines of 90-100 percent across 59 percent of its geographic range due to WNS (Cheng et al. 2021). The range-wide population is predicted to decline by 89 percent over the next few years, resulting in a 65 percent reduction in spatial distribution (USFWS, 2021, 2022).” (p. G-66).

#### 5.2.1 Background on Noise Sensitivity in Bats

Although the DEIS notes that research is limited in relation to noise sensitivity related to the species of concern, it is important to note that their references are from different regions. This is better than no references and this information should be considered, but it should be more clear that one is related to European *Myotis* and another in California. (p. G-157)<sup>21</sup> Even though the little brown bat is in the same genus (*Myotis* species) as the Indiana and Northern Long-eared bats, the impact of noise and other development to the little brown bat should not be compared to that of the federally endangered species. Little brown bats are known to be more tolerant of using anthropogenic resources and more generalist compared to Indiana and Northern Long-eared bats. (p. G-157).<sup>22</sup>

In sum, while the DEIS discusses noise sensitivity in bats, it draws on limited and geographically inconsistent research. References include studies of European *Myotis* species and California populations, which may not accurately reflect the needs of federally endangered species in New York. The little brown bat, for example, is more tolerant of human disturbance and habitat modification than the Indiana or Northern Long-Eared Bat, making it an unsuitable stand-in for assessing potential impacts.

Some of Micron’s proposed mitigation measures resemble those used in Indiana Bat conservation at the Indianapolis Airport, where there has been over a decade of research that may be useful for improving the mitigation measures (p. 188). However, roost fidelity—the tendency of bats to return to the same maternity roosts—is not addressed, even though it is an important factor for endangered bats.<sup>23</sup> Artificial

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<sup>21</sup> This paper should also be considered in this assessment: Li, Han, Chase Crihfield, Yashi Feng, Gabriella Gaje, Elissa Guzman, Talia Heckman, Anna Mellis, Lauren Moore, Nayma Romo Bechara, Sydney Sanchez, and et al. "The Weekend Effect on Urban Bat Activity Suggests Fine Scale Human-Induced Bat Movements" *Animals* 10, no. 9: (202): 1636, <https://doi.org/10.3390/ani10091636>.

<sup>22</sup> See additional references: S.M Bergeson, T.C. Carter, and M.D Whitby. 2015. “Adaptive roosting gives little brown bats an advantage over endangered Indiana bats.” *The American Midland Naturalist*, 174: 321-330, <https://doi.org/10.1674/0003-0031-174.2.321>;

S.M Bergeson, J.B. Holmes, & J.M O’Keefe. 2019. “Indiana bat roosting behavior differs between urban and rural landscapes.” *Urban Ecosyst* 23 : 79–91. <https://doi.org/10.1007/s11252-019-00903-4>.

<sup>23</sup> S.E. Lewis, 1995. “Roost fidelity of bats: a review.” *Journal of Mammalogy*, 76(2): 481-496, <https://doi.org/10.2307/1382357>.

Gumbert, M.W., O’Keefe, J.M. and MacGregor, J.R., 2002. “Roost fidelity in Kentucky.” *The Indiana bat: biology and management of an endangered species* (A. Kurta and J. Kennedy, eds.). *Bat Conservation International*, Austin, Texas:143-152, <https://copperheadconsulting.com/wp-content/uploads/2021/01/Gumbert-et-al-2002.pdf>.

roosts are included as a mitigation measure, but recent research on their effectiveness for Indiana Bats should be reviewed before implementation.<sup>24</sup>

The DEIS also discusses a separate project to monitor bat dispersal from the Jamesville hibernaculum. To maximize the data collected from such a disturbance, funding should cover aerial telemetry and numerous stationary antennas, as previous efforts without aerial support have had limited success.<sup>25</sup>

Micron's DEIS acknowledges "Impacts to population size and viability from the loss of roosting and foraging habitat on the Micron Campus would therefore be possible through potential reductions in fecundity, adult survival, or both." (p. G-151). However, given roost fidelity, bats are likely to return to their original roost sites, forcing them to find new ones at a critical time in early spring emergence. The proposed alternative roost sites are miles away, and it is uncertain whether bats are aware of these locations or if they provide suitable habitat. For the bats to find these sites requires a lot of energy and poses quite a risk.

### **Reptiles and Amphibians**

Urban and suburban development is one of the greatest threats to reptile and amphibian populations.<sup>26</sup> Micron's construction is expected to cause mass mortality among these species, as they are "not mobile enough to avoid the paths of most site clearing and earthmoving activities" (p. 3-118). In addition to direct mortality, noise, artificial lighting, and changes to water balance and quality in the Youngs Creek basin could cause further harm.

Micron's mitigation plan includes stormwater Best Management Practices (BMPs), Stormwater Management Practices (SMPs), and an Erosion and Sediment Control Plan (ESCP) as measures to "minimize adverse effects" of construction on reptiles and amphibians (3-119). While these measures may reduce some harm, the DEIS does not include a plan for rescuing or relocating affected animals. Regulators should require wildlife crossings to facilitate safe passage for turtles, salamanders, snakes, frogs, and toads, and the impact of noise and light pollution—particularly on frogs—should be evaluated. Micron should also provide case studies demonstrating the success of similar measures in minimizing harm to reptiles and amphibians in other developments.

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<sup>24</sup> Here are a few examples but also see additional resources from the O'Keefe lab: R.D. Crawford and J.M. O'Keefe. 2021. "Avoiding a conservation pitfall: Considering the risks of unsuitably hot bat boxes." *Conservation Science and Practice*, 3(6): 412, <https://doi.org/10.1111/csp2.412>;

R. D. Crawford and J.M. O'Keefe. 2024. "Improving the science and practice of using artificial roosts for bats." *Conservation Biology*, 38(1):14170, <https://doi.org/10.1111/cobi.14170>;

F.E. Tillman, G.S. Bakken and J.M. O'Keefe. 2021. "Design modifications affect bat box temperatures and suitability as maternity habitat." *Ecological Solutions and Evidence*, 2(4) : 12112, <https://doi.org/10.1002/2688-8319.12112>.

<sup>25</sup> P.L. Roby, M.W. Gumbert and Lacki, M.J. 2019. "Nine years of Indiana bat (*Myotis sodalis*) spring migration behavior." *Journal of Mammalogy*, 100(5): 1501-1511, <https://copperheadconsulting.com/wp-content/uploads/2021/01/Roby-et-al.-2019-9-yrs-of-MYSO-spring-migration.pdf>.

<sup>26</sup> U.S. National Park Service. 2010. "Reptiles and Amphibians - Threats and Concerns." <https://www.nps.gov/articles/reptiles-and-amphibians-threats.htm>.

To facilitate animal movement and limit road mortalities, regulators should require Micron to construct road crossings for fauna such as turtles, salamanders, snakes, frogs, and toads. The extent of the impact of noise and lighting disturbances, particularly on frogs, should also be evaluated and addressed. Lastly, Micron should provide studies of other developments where their proposed measures (BMPs, SMPs, and ESCP) were successful in minimizing adverse effects on reptiles and amphibians. Additionally, both artificial light at night (ALAN) and noise pollution affect amphibians, particularly frogs. The final EIS should also address the impact of artificial light on impacted species.

### **Aquatic Life**

The DEIS acknowledges that filling wetlands and surface waters will reduce habitat value of the Youngs Creek wetland complex and associated aquatic features. The elimination of wetlands and headwater streams, as described in Section 3.3 (Water Resources), could permanently alter the transport of sediment, organic matter, nutrients, and macroinvertebrates that are critical to downstream physical, chemical, and biological attributes and processes, including species composition, nutrient cycling, and food web dynamics (Gomi et al. 2002, Meyer et al. 2007)."

The DEIS also makes clear that vegetation clearing and other construction activities may have detrimental impacts on nearby water bodies and sensitive species. In particular, the DEIS states that: "Vegetation clearing and other construction effects may elevate stream temperatures, which could cause temperatures to exceed the tolerance levels of sensitive species, including many cold-water fish and macroinvertebrates (Nelson and Palmer 2007). Changes in topography and soil exposure may temporarily increase soil erosion, which could increase sediment, turbidity, and nutrient loading in receiving waterbodies. This could lead to harmful algal blooms and decreased dissolved oxygen levels, which could lead to fish kills, increased establishment and spread of invasive plants, or other adverse effects on aquatic biota (Driscoll 2003, Fleming and Dibble 2015). As described in Section 3.3 (Water Resources), Micron would conduct water level and flow monitoring during construction to assess surface water and groundwater inflow and outflow in response to seasonal variations and precipitation events. In addition, Micron would implement the stormwater BMPs and SMPs and the ESCP described above to prevent discharge of sediment into wetlands and waterbodies during construction. These measures would help minimize adverse effects on the Youngs Creek complex downstream of areas of disturbance and on aquatic life in the complex." (p. 3-119)

Insufficient studies have been done to show that the measures proposed here will in fact minimize the stated effects.. The final EIS should include studies demonstrating that the proposed mitigation methods will successfully reduce the impacts on aquatic life.

### **Birds**

Bird populations are in steep decline across North America.<sup>27</sup> The most recent *State of the Birds* report warns that "more than one-third of U.S. bird species are of high or moderate conservation concern."<sup>28</sup> Even species once considered common are experiencing sharp population declines in habitats where they

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<sup>27</sup> Kenneth Rosenberg *et al.* 2019 "Decline of the North American Avifauna." *Science*. : <https://www.science.org/doi/10.1126/science.aaw1313>.

<sup>28</sup> "State of the Birds 2025." *US North American Bird Conservation Initiative*. <https://www.stateofthebirds.org/2025/>.

are known to be abundant.<sup>29</sup> A leading cause of these declines is habitat loss and fragmentation caused by development. Large-scale developments like the Micron project not only threaten specific groups, such as grassland birds, but also affect the broader diversity of avian species in the region. While the DEIS places emphasis on conserving grassland birds, effective mitigation strategies should address impacts across all bird species. These strategies could include creating and restoring habitat near the Micron site, as well as providing financial support to local conservation organizations such as the CNY Land Trust, Onondaga Audubon, and other environmental groups, including those promoting the use of native plants.

Open habitats in New York State are disappearing rapidly, contributing to population declines among grassland songbirds. According to the NYSDEC *Strategy for Grassland Bird Habitat Management and Conservation 2022-27*: “Current grassland habitat on State land is limited and insufficient to meet the needs of grassland birds.”<sup>30</sup> Early successional habitats require regular natural or human disturbances, such as fire, wind, haying, or grazing, to remain viable. Two species of conservation concern in New York State - the Northern Harrier and the Short-Eared Owl - depend on large, contiguous tracts of grassland for breeding and overwintering. Many grassland songbirds are also area-sensitive, meaning they require minimum habitat thresholds to sustain viable populations. Mitigation measures must incorporate minimum thresholds suitable to conserve such species.

Both Northern Harriers and Short-Eared Owls have been observed within the proposed project site (G-3.5.5, page G-67) and are species of special concern in New York State. In the case of Northern Harriers, Ramboll staff documented a harrier egg on the ground, suggesting an attempt to nest at the site and “a short-eared owl was documented at the Micron Campus site by NYSDEC and members of the public on eBird during the winter of 2022-2023.” (G-3.5.5, page G-67). The DEIS references a single Short-Eared Owl sighting, but observers have reported three individuals at the site in 2023, which may indicate a communal roosting site. This discrepancy underscores the need for more detailed information about the presence of Short-Eared Owls.

The Short-Eared Owl is particularly vulnerable to habitat destruction and fragmentation. It requires large, intact grassland areas for both breeding and wintering. Therefore, the primary threat to the Short-eared Owl is threats include habitat loss or fragmentation of habitat due to development, wetland loss, reforestation, and changing farming practices.<sup>31, 32</sup>

According to the Grassland Bird Trust, wintering flocks of 40 – 50 Short-eared Owls were historically easily observed in the large grassland areas that occurred across the state. Once one of the most common owls in the State, they are now listed as endangered in New York. Mitigation for any habitat with potential use as a wintering site by Short-eared Owls should be implemented. Because Northern Harriers

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<sup>29</sup> Johnson *et al.* 2025. “North American bird declines are greatest where species are most abundant.” *Science*. May. <https://www.science.org/doi/10.1126/science.adn4381>.

<sup>30</sup> NYS DEC. NYSDEC Strategy for Grassland Bird Habitat Management and Conservation 2022-2027. <https://dec.ny.gov/sites/default/files/2024-04/grasslandbirdsstrategyfinal.pdf>.

<sup>31</sup> Corwin, Kimberly. 2012. “Species Status Assessment: Short-eared Owl.” New York State Department of Environmental Conservation.

<sup>32</sup> Post, Tim. 2004. “State wildlife comprehensive plan- draft species group report for grassland birds.” New York State Department of Environmental Conservation. Comprehensive wildlife conservation, September. <https://guides.nynhp.org/northern-harrier/#:~:text=One%20of%20the%20most%20significant,1984%20cited%20in%20NatureServe%202003>.

and Short-eared Owls have similar habitat requirements and are often observed in the same area, providing and managing large blocks of grasslands for mitigation will benefit both species.

Successful habitat management for Short-Eared Owls—and for Northern Harriers, which have similar habitat needs—requires conservation or restoration of large blocks of grassland exceeding 247 acres, with adequate prey populations such as small mammals. Mitigation for any habitat with potential wintering use by Short-Eared Owls should therefore be prioritized.

The DEIS requires Micron to achieve a 3:1 ratio of new or improved grassland bird habitat to habitat lost through the proposed project and connected actions. However, this ratio is not adequate (p. 3-136).

Due to the extreme amount of habitat loss expected from the Micron site development and the secondary impacts of related infrastructure and population growth, the mitigation ratio should exceed 3:1 to provide a new conservation benefit. In addition to the 1,400 acres developed for Micron's primary operations, land along Route 31 has been purchased for supply chain industries, additional parcels near the site are being sold, and large tracts will be used for road widening, new power lines, solar and wind projects, and infrastructure rights of way. Housing developments, shopping centers, entertainment venues, schools, and medical facilities are also expected to follow. Cumulatively, this will result in significant habitat loss over the next sixteen years.

Given these impacts, a habitat replacement ratio of at least 5:1 is reasonable to provide a net conservation benefit. The newly created grassland habitat is currently planned at a minimum size of 25 acres each, located in Oswego, Chenango, Yates, Cortland, Broome, Tompkins, and Tioga Counties at distances of approximately 10-60 miles from the Micron site. While this meets the NYSDEC's minimum threshold for grassland habitat parcels, it is insufficient to ensure the long-term success of grassland bird populations. See NYSDEC's *Strategy for Grassland Bird Habitat Management and Conservation 2022-27*. The minimum parcel size should be increased to 75 acres. While the Grasshopper Sparrow has not been detected on the Micron property, they could possibly occur in the area (Table G-4). Ultimately, Grasshopper Sparrows need more habitat across New York State. Given that they are most successful in at least 75 acres of habitat, they could represent an umbrella species for grassland habitat mitigation. Mitigating habitat suitable for Grasshopper Sparrows would ultimately result in suitable habitat for most other grassland bird species that are less area sensitive.

Mitigation should prioritize fewer, larger contiguous tracts over many small parcels to reduce habitat fragmentation. The DEIS also notes that the mitigation plan will operate in five-year cycles but does not provide detailed site management plans or address long-term management responsibilities. This deficiency must be corrected.

### **Bird Migration**

A major gap in the DEIS is the lack of consideration for migratory bird stopover use of the property. Central New York lies along the Atlantic Flyway, a critical migration corridor for numerous bird species, from small warblers to large raptors. Stopover habitat is essential for both short-distance migrants, such as sparrows traveling to Florida, and long-distance migrants, such as neotropical species, which require safe resting and feeding areas to complete their journeys.

Migratory bird surveys should be conducted during both spring and fall in addition to the breeding and wintering seasons. The majority of bird migration occurs at night, and artificial lighting can disorient or lure birds off their migration paths. To reduce this risk, construction lighting should be turned off between 11 p.m. and 6 a.m. during peak migration periods in spring and fall.

#### Excavation of the Site for Construction

The DEIS notes that the construction of the facility will require excavating over 1.6 million cubic yards (2.70 to 3.67 million total tons) of soil and muck from the existing wetlands and fields at the WPCP. This material is designated for “beneficial reuse” (p. 3-224 et seq). Micron should coordinate with the Wetlands Trust to see whether this material which is rich in wetland plant seeds, spores, and microorganisms could be utilized to create new wetlands as part of the wetlands mitigation plan. This would minimize long-distance transport of this huge amount of material, and could accelerate the establishment of new wetlands.

## **FLOODING**

### **Loss of Water Storage & Increased Runoff**

Micron’s development plans will convert approximately 200 acres of wetlands and nearly 8,000 linear feet of streams into 645 acres of impervious surfaces such as asphalt and concrete, and 58 acres of semi-impervious surfaces. The company will clear 445 acres of trees and shrubs, remove 1.4 million cubic yards of soil and 978,000 cubic yards of bedrock, and import nine million cubic yards of fill to create a stable construction foundation.

In total, almost 10,000 acres of ground will be disturbed, resulting in permanent changes to how water flows through the site. Where water once pooled in wetlands, recharged into the ground, and was released gradually into streams, it will now run rapidly off pavement and rooftops toward remaining permeable land and downstream areas. This change will be especially pronounced during heavy rainstorms, which climate change is expected to make more frequent and intense. Micron’s proposed wetland restoration sites are not located downstream of the campus, meaning they will not offset the loss of water storage capacity on-site.

Although Micron’s Draft Environmental Impact Statement acknowledges an increase in stormwater runoff, it does not provide detailed stormwater management plans. Once complete, the project will include 66.6 acres of stormwater management areas, and Micron states it will use stormwater best management practices and adaptive management in compliance with state laws and permits. However, preliminary runoff calculations are not included in the DEIS. Using the Rational method (the standard yet simplified equation for estimating stormwater runoff) the site is expected to generate about 1,360 cubic feet per second of runoff during rainfall of two inches per hour.<sup>33</sup> For comparison, the Oneida River downstream of the site typically ranges from 2,000 to 8,000 cubic feet per second just downstream of the

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<sup>33</sup> Thompson, D.B. 2006. “The rational method, Regional regression equations, and site-specific flood-frequency relations.” Texas Department of Transportation Research and Technology, Report No. 0-4405-I: 78763–5080, <https://library.ctr.utexas.edu/hostedpdfs/texastech/0-4405-1.pdf>.

Micron site in Euclid, New York. Additionally, climate-driven increased heavy rain could further raise runoff levels, but this factor is not considered in the plan.

Stormwater quantities associated with the rail spur, childcare center, and wastewater treatment plant expansion have not been calculated, and the DEIS does not address potential water quality impacts from runoff. Without this information, it is impossible to evaluate whether the proposed 66.6 acres of stormwater management and wetland restoration can adequately mitigate the increased water quantity and quality issues resulting from site development. This omission must be remedied.

Micron’s flood analysis is limited to comparing its sites to FEMA flood maps to determine whether they fall within the existing 100-year or 500-year floodplain. The DEIS acknowledges that development will increase stormwater runoff and potentially expand floodplain boundaries, stating that, “Flooding can endanger human life and damage property, particularly in floodplains where development has occurred (NYSDEC, 2024c). Changes in land use and precipitation and runoff patterns, impervious surfaces, and obstructions in floodways can alter floodplain boundaries and potentially expand floodwater footprints (Tetra Tech, 2019).” (p. F-30) But their analysis does not include any such modeling or calculations. They also acknowledge that significant growth of residential and commercial areas in the surrounding region is likely and will lead to the loss of more wetlands and streams and an increase in impervious surfaces. This will raise downstream flood and pollution risks but is not considered in the DEIS. The DEIS also fails to incorporate projected increases in heavy precipitation events caused by climate change. Instead, it concludes there is no flood risk because the site is not currently within or directly adjacent to a floodplain.

The lack of consideration of downstream flood risks means that impacts on downstream communities—particularly Phoenix and Fulton, which already face severe and extreme flood risks—are not adequately considered. Once the Micron facility is fully operational, it will discharge roughly 40 million gallons of treated industrial and sewage wastewater daily into the Oneida River, compared to the current 6 million gallons per day from the existing treatment plant. This wastewater discharge, combined with increased stormwater runoff, could exacerbate downstream flooding.

While upstream Brewerton is projected to have only moderate flood risk, downstream towns of Phoenix and Fulton have severe and extreme flood risks respectively, according to First Street Map analysis (see maps below).<sup>34</sup> These risks will only increase with climate change and increased impervious surfaces in the watershed.

The DEIS says the Micron development will not result in significant adverse or cumulative effects on water resources and floodplains. However, sufficient information has not been provided to take a hard look at cumulative flooding impacts or to justify that the proposed stormwater management and wetland restoration is enough mitigation to address all of these impacts and claim no significant adverse effects.

Impervious surface cover (ISC) is a strong predictor of stream degradation, with runoff doubling when ISC reaches 10–20 increasing more than fivefold at 75–100%.<sup>35</sup> The Micron site’s conversion to a highly

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<sup>34</sup> Brewerton, Moderate: [https://firststreet.org/city/brewerton-ny/3608059\\_fsid/flood](https://firststreet.org/city/brewerton-ny/3608059_fsid/flood).

Phoenix, Severe: [https://firststreet.org/city/phoenix-ny/3657661\\_fsid/flood](https://firststreet.org/city/phoenix-ny/3657661_fsid/flood).

Fulton, Extreme: [https://firststreet.org/city/fulton-ny/3627815\\_fsid/flood](https://firststreet.org/city/fulton-ny/3627815_fsid/flood).

Oswego, Moderate: [https://firststreet.org/city/oswego-ny/3655574\\_fsid/flood](https://firststreet.org/city/oswego-ny/3655574_fsid/flood).

<sup>35</sup> M. J. Paul and J. L. Meyer. 2001. “Streams in Urban Landscape.” *Annual Review of Ecology, Evolution and Systematics*, Vol. 32, No. 1.

impervious surface will degrade surrounding wetlands and food webs, disrupt wildlife with noise and lights, and lead to runoff pollution that promotes invasive plant monocultures. The wetlands on site are good quality, including red maple swamps, hemlock hardwood swamps, floodplain forests, and dogwood and willow shrub swamps. These wetlands contain a high proportion of native species that benefit insect production that serve as the basis of food webs. Lowering the water table for construction over a 15-year period will further affect surrounding streamflow and aquatic ecosystems, potentially eliminating small streams and wetlands entirely. These impacts will be compounded by additional development in Clay, Cicero, and the broader Onondaga and Oswego County areas.

Given these cumulative risks, regulators should require a higher wetland replacement ratio of 10–15:1, similar to the Seneca Meadows wetlands restoration project to adequately compensate for the loss of wetland function and flood protection.<sup>36</sup>

### **Dewatering for Construction**

Groundwater at the Micron site lies between 0.1 and 7.8 feet below the surface. To build the fabrication facilities and other underground infrastructure, Micron will need to pump water out of the construction area, a process known as dewatering. This will artificially lower the water table, potentially draining nearby wetlands, streams, and wells. The water will be stored and discharged, creating additional environmental considerations. Construction is expected to take 16 years, and the DEIS does not fully evaluate the environmental consequences of long-term dewatering or present a mitigation plan to protect nearby aquatic systems.

### **Interim Wastewater Discharge During Build-Out**

Before the full wastewater treatment plant is upgraded, Micron plans to discharge water from construction, initial equipment testing, and possibly initial manufacturing in Fab 1. A temporary water treatment system will be built, consisting of biological treatment methods. By the time Fab 1 is operational in 2029, it is expected to be producing 8.7 million gallons per day of industrial wastewater. This temporary system could operate for at least four years, handling significant volumes of wastewater, yet the DEIS provides few details about how it will treat potential pollutants. Without a thorough plan, there is no assurance that this discharge will avoid significant environmental harm.

### **Water Contamination from Construction**

Throughout the 16-year construction period, large portions of the Micron site will be cleared and excavated, exposing sediment previously stabilized by vegetation increasing erosion. The DEIS says “temporary erosion and sediment controls, stormwater management areas, and stormwater infrastructure” (p. 2-9) will be put in place. Utility installation will disturb 420 acres of land through trench excavation, pipe laying, and backfilling, or through jack-and-bore and horizontal directional drilling under streams. However, without detailed analysis of sediment transport, nutrient loading, and water quality impacts, it is unclear whether these measures will be sufficient to prevent contamination of surrounding water bodies.

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<sup>36</sup> “Seneca Meadows Wetland Restoration Design-Build Mitigation for Landfill Impacts to Wetlands,” RES, <https://res.us/projects/seneca-meadows-wetland-restoration-design-build-mitigation-for-landfill-impacts-to-wetlands/>.

## **UTILITIES AND SUPPORTING INFRASTRUCTURE**

### **Energy Use**

Micron proposes to burn 9.7 billion cubic feet of natural gas annually, primarily to incinerate process gases containing perfluorocarbons (PFCs) (p. 3-272). PFCs are powerful greenhouse gases. Micron will build a 16” diameter gas pipeline to their site, pictured in brown. Burning PFCs will create more hazardous fluorinated compounds, as discussed under Air Pollution.

To improve natural gas infrastructure the DEIS proposes upgrades to an existing facility located in Onondaga County at tax parcel 029.-01-13.1. In particular, the DEIS also proposes building a “new” natural gas line from GRS 147 to the Micron site, approximately 3 miles long (p. 2-27). The DEIS does not make clear who will pay the cost of building the new gas line. The creation of the use of a new natural gas line raises questions about the compliance with, and impacts to, CLCPA goals.

National Grid will provide power to the new Micron facility at a discounted utility rate through the Excelsior Jobs Program Rate Discounts, as part of the broader CHIPS agreement. This discount will apply to the first 10 years of the project, or Phase 1, and will amount to an estimated \$244 million. In addition, National Grid will provide a \$13.5 million revenue assurance contract and a \$8.5 million economic development grant to Micron. The DEIS does not make clear who will cover the cost of Micron’s discount. It is crucial that these discounts are not passed on to ratepayers.

### **Electricity Consumption**

Micron will use 15,674 GWh of electricity annually, equivalent to the total power used by customers in CNY (Load Zone C) in 2023 (p. 3-269). To accommodate this enormous power demand, the DEIS calls for the expansion of the existing National Grid Clay substation by approximately 10 acres and new electric transmission lines of approximately one mile. However, it is unclear who is paying the cost of this expansion. It is also unclear how this level of electricity demand will impact the cost of electricity for CNY ratepayers and the reliability of the grid. The EIS must detail both who will bear the cost of this expansion and how this expansion along with Micron’s massive electricity needs will impact the reliability of the electrical grid. The National Grid new natural gas line will not run along any property besides Micron (p. 3-8-9).

### **Telecommunications**

The DEIS notes “the Preferred Action Alternative would not result in any significant adverse effects on broadband internet connectivity or telecommunications infrastructure, as existing systems are expected to meet both current and future Proposed Project related and regional demand” (p. 0-11). The DEIS calls for the re-routing of two fiber optics lines along Caughdenoy Road and NYS Route 31 (p. 2-42).

We urge the lead agencies to ensure these investments also benefit the local community by expanding broadband access. To do so, we recommend that the telecom improvements proposed also serve the communities surrounding the facility, as the area is predominantly rural and lacks sufficient broadband

access. This would align with the recommendations of the CEC Priorities Document, which lists expanding high-speed broadband access as one of its additional priorities to “Modernize and sustainably manage utilities and natural resources for a resilient and sustainable Central New York.”<sup>37</sup>

## Water Use

Micron’s megafab is expected to use 48 million gallons of water per day (p. 2-31), and liquid waste generation per day is expected to be 8-20 million gallons, according to Micron’s OCIDA application.<sup>38</sup> Micron will receive its water from the district’s water source, which is Onondaga Lake. The water will be treated at Oak Orchard Wastewater Treatment Plant. Micron is working with the Onondaga County Water Authority to expand capacity by installing new wastewater force mains, pumping stations, and improvements to the Oak Orchard Wastewater Treatment Facility. Due to expanded capacity, a new wastewater/sewage treatment district will be created. The receiving water for this new wastewater treatment district will be the Oneida River. The DEIS also states the site will include on-site infrastructure to reuse water (2-37).

Onondaga County will plan, construct, and operate this expanded wastewater treatment plant, and Micron will pay for their services. However, Onondaga County will be responsible for removing any toxic chemicals from Micron's industrial wastewater that are not eliminated during pretreatment (see discussion of PFAS). Recent news reports indicate that Onondaga County’s sewage plant on Hiawatha Boulevard was shut down due to unhealthy air quality, suggesting that the County does not have a strong track record in managing wastewater treatment plants.<sup>39</sup>

During the four years needed to construct this expansion, Micron will construct a temporary water treatment project for construction, initial equipment testing, and possibly initial manufacturing. The temporary plant will be responsible for treating up to 8.7 million gallons per day of industrial wastewater. However, very few details about the design, operation, or oversight of this temporary wastewater treatment are provided. The final EIS must provide more details about how both the temporary and future treatment plants will be managed to prevent adverse health and safety impacts.

According to reporting from 2023, the cost of the wastewater and water system expansion is estimated to be \$625 million.<sup>40</sup> However, the DEIS does not confirm whether this estimate is accurate. Nor is it clear who will pay for the cost of the expansion. According to OCWA, they expect Micron to pay for the

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<sup>37</sup> “Harnessing Opportunity: Community Priorities for Central New York: Community Priorities Document,” Central New York Community Engagement Community, 2024: 46, <https://www.cnycec.org/community-priorities-document>.

<sup>38</sup> “Micron Application: Onondaga County Industrial Development Agency Application for Financial Assistance,” Onondaga County Industrial Development Agency, 2023: <https://www.ongoved.com/assets/Uploads/files/projectfiles/7-20-23-Micron-Application-Website.pdf>.

<sup>39</sup> Coin, Glenn. 2025. “The air is so toxic in Onondaga County’s new \$23 million sewage building that workers can’t go inside.” *Syracuse.com*, July 14, <https://www.syracuse.com/news/2025/07/the-air-is-so-toxic-in-onondaga-countys-new-23-million-sewage-building-that-workers-cant-go-inside.html>.

<sup>40</sup> Coin, Glenn. 2023. “It could cost \$625 million to bring water from Lake Ontario to Micron. It’s not clear who’s paying.” *Syracuse.com*, October 18. <https://www.syracuse.com/business/2023/10/it-could-cost-625-million-to-bring-water-from-lake-ontario-to-micron-its-not-clear-whos-paying.html>.

majority of the costs, while Micron has said they will only pay for part of the expanded water system.<sup>41</sup> It's critical that ratepayers do not bear the burden of Micron's massive water use and that infrastructure upgrades designed exclusively to meet Micron's needs do not come at the expense of other necessary upgrades to ensure a safe and reliable water system for the general public.

Although County water authorities have stated that ratepayers are unlikely to bear the full cost of upgrades, "OCWA reports that if its users were to bear the entire cost, the typical homeowner's bill would increase by 60%."<sup>42</sup> Additionally, will Micron receive any discounts from OCWA for its water use? The final EIS must clearly state whether any discounts will be provided to Micron, and if so, who will bear the cost of those discounts.

### **Utilities and Supporting Infrastructure Recommendations**

*Commit to affordability and abundance of energy & clean water for communities* - Micron must ensure that their massive energy and water use does not compromise the affordability or availability of energy and clean water in Central New York or elsewhere. The costs of infrastructure upgrades and increased energy demand to benefit Micron should not be borne by ratepayers. The EIS must clearly state who will pay for the upgrades and expansion to water, electricity, energy, and telecom infrastructure. Additionally, the EIS must make clear if the cost utility tax abatements that Micron will receive will be offset onto ratepayers.

## **GREENHOUSE GAS EMISSIONS, CLIMATE CHANGE, AND CLIMATE RESILIENCY**

### **Renewable Energy and Scope 2 Climate Impact**

The DEIS concluded, "The GHG [greenhouse gas] emissions that would result from construction and operation of the Proposed Project are expected to be **unavoidably significant**. Even with significant avoidance and minimization efforts as well as mitigation, GHG emissions associated with operation of the Micron fabs and related facilities will represent a significant increase in overall GHG emissions in the Five County Area and New York State." (p. 5-2)

To their credit, the authors of the DEIS acknowledge that the GHG emissions will significantly contribute to climate change. However, we are shocked that more has not been done to make these emissions avoidable, especially given the urgency of local and global efforts to combat climate change.

The most significant GHG emissions from semiconductor processing, distinct from Micron's energy use, are fluorinated gases, which are extremely potent and persistent greenhouse gases. Some of these gases remain in the atmosphere for tens of thousands of years. The DEIS estimates that the project will release 881,699 metric tons CO<sub>2e</sub> per year of these gases, even after on-site thermal oxidation (incineration) (p. 3-205). Furthermore, stack emissions are treated by wet scrubbing to reduce acid releases. These

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<sup>41</sup> Ibid.

<sup>42</sup> Ibid.

scrubbers discharge pollutants, including PFAS, into wastewater, where they must then be removed and/or treated.

The DEIS identifies another category of processed greenhouse gas emissions, heat transfer fluids (HTFs). The DEIS projects annual fugitive HTF emissions of 199,699 metric tons/y CO<sub>2e</sub> per year. While the DEIS notes that the semiconductor industry is researching ways to prevent such releases, it offers few details. For now, Micron expects to pass the environmental costs of its greenhouse gas emissions onto the public.

The DEIS claims that the company will mitigate 2.4 million tons of CO<sub>2e</sub> through the purchase of renewable electricity (p. 3-215), yet it provides no procurement guidelines and fails to acknowledge the mitigation limitations of renewable energy credits (RECs). Unless it actually creates renewable energy generation, the Micron project will cause the release of a huge amount of carbon dioxide from energy generation. Without significantly more stringent mitigation, the proposed project will have substantial negative impact on New York's renewable electricity targets, necessitating the continued operation of fossil gas power generation beyond current plans and introducing significant additional on-site gas burning as is discussed more in the section analyzing the project's impact on the state's CLCPA goals.

To reduce greenhouse gas emissions from electricity production, a huge buildout of renewable energy will be needed. Micron plans to install solar panels on a few office buildings, locomotive sheds, and parking garages, generating 4,161 MWh per year; however, this is less than .03% of Micron's electricity needs (p. 3-203). Much more must be done to meet CLCPA requirements.

### **Best Management Practices and Renewable Energy Credits**

The DEIS asserts that "To further avoid and minimize GHG emissions and effects to climate change and climate resiliency during construction and operations, Micron would implement the best management practices (BMPs) noted within this Chapter and additionally in Table 3.7-14" (p. 0-9). In the context of addressing the significant climate impacts of this project related to its electricity consumption, Micron makes disconcerting claims.

1. Micron will "install on-site renewable energy systems and onsite battery storage systems to supplement the Proposed Project's energy supply to the extent practicable" (p. 3-215).

This represents one of several sustainability requirements set out in the New York Green CHIPS legislation.<sup>43</sup> However, while the claim is included several times throughout the DEIS, the scale of the project severely limits its usefulness in climate mitigation to little more than a box-ticking exercise. Table 3.7-13 reports that the 4MW solar array will mitigate a projected 457 metric tons of Scope 2 emissions per year, out of a total projected Scope 2 emissions footprint of 2,273,587 metric tons, or 0.02%.

2. "Micron also has committed to reduce its Scope 2 emissions by purchasing 100 percent carbon-free electricity utilizing power purchase agreements and renewable energy credits for the power consumption of the Micron Campus, thus avoiding up to approximately 2.4 MMT of CO<sub>2e</sub>

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<sup>43</sup> "Micron Green CHIPS Sustainability Requirements." Empire State Development. <https://esd.ny.gov/micron-green-chips-sustainability-requirements>.

(p. 3-215). “When compared to pre-mitigation GHG emissions, Micron avoids approximately 77 percent of potential GHG emissions.”

Micron has committed to 100% carbon-free electricity emissions to reduce Scope 2 emissions as a result of the purchase of renewable electricity (p. 3-215), offsetting the full projected 2,394,307 metric tonnes of emissions included in table 3.7-10 (p. 3-205).

The purchase of renewable electricity represents a significant portion of its claim of mitigating 77% of potential GHG emissions - a claim which must be closely examined (p. 3-46). The DEIS states that Micron will utilize power purchase agreements and renewable energy credits, but fails to commit Micron to any specific ratio, nor does it preclude Micron from relying entirely on unbundled renewable energy credits to meet this claim.

The purchase of unbundled RECs is widely understood to be ineffectual as a strategy for reducing fossil fuel emissions. The U.S. Department of Energy, for example, has explicitly concluded that RECs are not effective in reducing GHG emissions or deploying additional renewable energy:

Given the impacts of adding load to the grid... purchasing an Energy Attribute Certificate<sup>44</sup> from any low-GHG generator is not in and of itself sufficient to justify a claim of low lifecycle GHG emissions due to the presence of induced effects.<sup>45</sup>

The use of RECs as a best management practices (BMP) is contrary to the common usage of BMPs in other contexts, and as a practice is inappropriate to apply here. The EPA’s Guidance Manual for BMPs states “Best management practices are **inherently pollution prevention practices.**”<sup>46</sup> It has been widely and firmly established that the purchase of RECs does not prevent or reduce pollution, and as such cannot be considered a BMP.

Agencies, including the U.S. Department of Energy (DOE), has explicitly said that RECs are not effective in reducing GHG emissions (pollution) or deploying additional renewable energy. Per the DoE Assessing Lifecycle Greenhouse Gas Emissions Associated with Electricity Use for the Section 45V Clean Hydrogen Production Tax Credit.

Numerous academic studies have shown that the relatively small revenue generated from the sale of unbundled RECs, given their low per unit price, has done little to expand renewable energy capacity.<sup>47</sup>

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<sup>44</sup> EAC is another term for REC.

<sup>45</sup> “Assessing Lifecycle Greenhouse Gas Emissions Associated with Electricity Use for the Section 45V Clean Hydrogen Production Tax Credit,” Department of Energy, 2023, 8, [https://www.energy.gov/sites/default/files/2023-12/Assessing\\_Lifecycle\\_Greenhouse\\_Gas\\_Emissions\\_Associated\\_with\\_Electricity\\_Use\\_for\\_the\\_Section\\_45V\\_Clean\\_Hydrogen\\_Production\\_Tax\\_Credit.pdf](https://www.energy.gov/sites/default/files/2023-12/Assessing_Lifecycle_Greenhouse_Gas_Emissions_Associated_with_Electricity_Use_for_the_Section_45V_Clean_Hydrogen_Production_Tax_Credit.pdf).

<sup>46</sup> EPA. 2023. “Best Management Practices” November. <https://www.epa.gov/watersense/best-management-practices>.

“Guidance Manual for Developing Best Management Practices.” Environmental Protection Agency, 1993: 4, <https://19january2021snapshot.epa.gov/sites/static/files/2020-02/documents/owm0274.pdf>.

<sup>47</sup> Holt, E., Sumner J. and L.Bird, “The Role of Renewable Energy Certificates in Developing New Renewable Energy Projects,” National Renewable Energy Laboratory, (2011): <https://docs.nrel.gov/docs/fy11osti/51904.pdf>; M. Brander, M. Gillenwater & F. Ascui, “Creative accounting: A critical perspective on the market based method for reporting purchased electricity (scope 2) emissions,” *Energy Policy*, vol. 112, (2018): 29-33. <https://www.sciencedirect.com/science/article/pii/S0301421517306213>.

Recent studies indicate that the purchase of unbundled RECs rarely results in the addition of renewable energy to the grid, and in fact, are significantly undermining the credibility of voluntary corporate targets under the Science Based Target initiative.<sup>48</sup>

**As an action to effectively reduce or eliminate GHG emissions from electricity generation, the purchase of RECs is inappropriate and insufficient, and cannot be considered a BMP.**

Further, neither the DEIS nor Micron’s Sustainability Report provide any details to demonstrate whether the company’s REC procurement practices would meet criteria for high-impact sourcing, or simply prioritize lowest-cost options. According to Micron’s latest available CDP report, renewables currently accounted for 10.4% of the company’s total U.S. electricity consumption in its current operations (in Idaho and Virginia), of which only 4.9% is from sources that may meet high-impact criteria, namely, those connected to local transmission and additional to the grid. To meet the company’s goal of sourcing 100% renewable electricity for its U.S. demand by the end of 2025, Micron will likely be heavily reliant on REC purchases.

The DEIS acknowledges that “Scope 2 emissions from offsite fossil fuel combustion to generate electricity account for almost half of total GHG emissions from the semiconductor manufacturing sector (U.S. Department of Commerce NIST-CPO 2024),” emissions that will be merely hidden if the company pursues a low-impact sourcing approach for renewable electricity.

To accurately represent its impacts, the environmental review should clearly state the criteria by which RECs/ EACs will be sourced, and how Micron will prioritize high impact Power Purchase Agreements (PPAs) and battery storage.

In sum, contrary to the fanciful claims in the DEIS, neither the purchase of RECs nor the purchase of renewable power from generators that are already connected to the grid mitigate carbon dioxide emissions from electricity generation. Mitigation can only be done through additional renewable energy generation that is added to the grid or serves Micron directly.

**Furthermore, even if Micron’s renewable electricity goal is achieved, it is inaccurate to claim that purchasing renewable electricity will mitigate 100% of Micron’s Scope 2 emissions.**

Micron’s commitment and its renewable electricity matching approach are not sufficient to mitigate its emissions, as they do not adequately reflect actual demand and induced power generation. This is because mitigation is calculated on an annual, rather than granular temporal basis (e.g. hourly or less). The annual matching model used by Micron calculates the total MWh of electricity consumed by the company over the course of a year, which it then offsets with an equivalent quantity of MWh of purchased renewable electricity. However, semiconductor fabs such as the one proposed by Micron rely on significant and relatively constant electricity supply to operate 24/7.<sup>49</sup> Matching annual electricity consumption with

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<sup>48</sup> Lloyd Bjorn and Matthew Bander, Matthew, “Renewable energy certificates threaten the integrity of corporate science-based targets.” *Nature Climate Change*, volume 12, (2022): 539–546, <https://www.nature.com/articles/s41558-022-01379-5>.

<sup>49</sup>Chen, Steven; Gautam Apoorv; and Weig Florian. 2013. “Bringing energy efficiency to the fab.” McKinsey on Semiconductors. [https://www.mckinsey.com/~media/mckinsey/dotcom/client\\_service/operations/pdfs/bringing\\_fabenergyefficiency.ashx](https://www.mckinsey.com/~media/mckinsey/dotcom/client_service/operations/pdfs/bringing_fabenergyefficiency.ashx).

annual renewable electricity purchases implies that the fab is powered by solar power at night, or by wind power on still days – an inaccurate and misleading claim. This hides a significant additional fossil fuel load demand added to the grid to ensure that the fab can keep operating when renewable power sources are unavailable.

To put this in context, Google has a commitment to 24/7 carbon-free energy to power its operations. Despite having been claiming to run on 100% renewable electricity for several years prior to the announcement, when calculated on a 24/7 hourly-matching basis, Google’s actual carbon-free energy ratio, accounting for grid energy, was just 66%.<sup>50</sup>

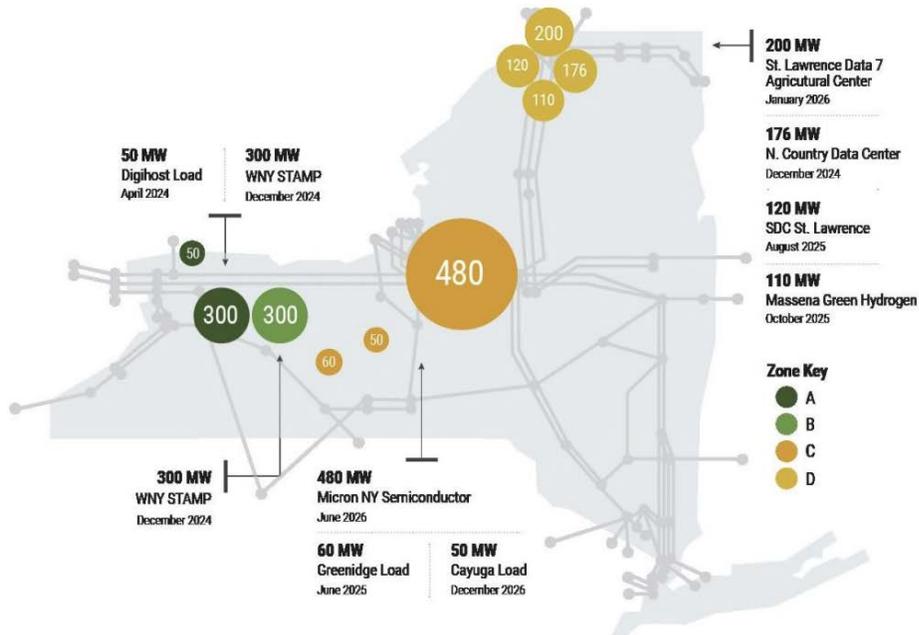
**To deliver real Scope 2 emissions mitigation, Micron must commit to power its facilities using 24/7 hourly-matched carbon-free energy, prioritizing new renewable electricity and battery storage. This is the only approach that would meaningfully decarbonize the grid and avoid additional fossil fuel buildout.**

The New York Integrated Systems Outlook already projects that fossil fuel power generation will need to remain online longer due to increased demand, including the Micron plant, which is identified as the most significant single demand source, at an additional 480MW:

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<sup>50</sup> “Google Environmental Report.” Google, 2025: 107.  
<https://www.gstatic.com/gumdrop/sustainability/google-2025-environmental-report.pdf>.

Capital Regions. Most of these new loads consist of manufacturing facilities and data centers, as well as potential hydrogen production operations. The following diagram highlights the large loads that are assumed to be connected in the Base Case:



51

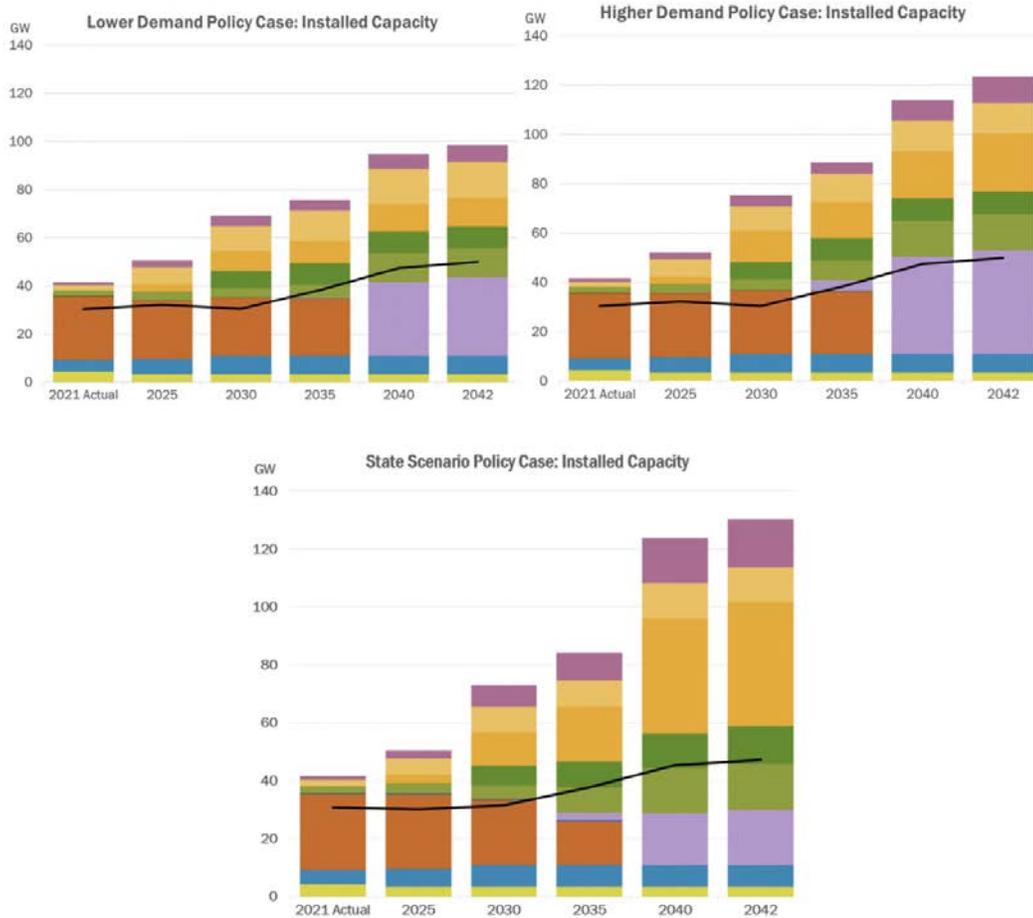
Under all growth scenarios, the NYISO expects electricity demand to grow significantly through 2042, requiring generation capacity to triple. According to the *Outlook*, since the previous forecast was published the ISO now projects a “greater need for grid energy to be supplied from dispatchable resources (e.g., fossil fuel or DEFR) compared to past evaluations,” in part due to a revised forecasted hourly demand profile, likely influenced by major load sites such as the Micron fab. The tables below show fossil fuel generation (orange) and “DEFR” (purple), which includes fossil fuels, as well as new and as-yet unproven technology. If the unproven small modular reactors (SMRs) and green hydrogen do not materialize, the increased demand could be met by fossil fuels that would otherwise be slated for retirement, undermining New York’s climate goals.

<sup>51</sup> “2023-2042 System & Resource Outlook (The Outlook).” New York Independent System Operator, 2024: <https://www.nyiso.com/documents/20142/46037414/2023-2042-System-Resource-Outlook.pdf>.

✓ **New York will require three times the capacity of the current New York generation fleet to meet projected future electricity demands.**

The total installed generation capacity to meet policy mandates within New York is projected to range between 100 GW and 130 GW by 2042. This conclusion is consistent with the findings from the prior Outlook. The following diagrams show the installed capacity required for each of the three Policy Case scenarios. Each color represents a different resource type as follows:

■ Nuclear 
 ■ Hydro 
 ■ Fossil 
 ■ Other 
 ■ DEFR 
 ■ LBW 
 ■ OSW 
 ■ UPV 
 ■ BTM-PV 
 ■ ESR 
 — Load+Charge+Electrolysis



NY-ISO identifies load flexibility as a key mitigation measure for new large-load projects connecting to the grid, of which the Micron proposed project is the largest:

“For new large load projects connecting to the New York power system, the ability to move load from times of greater system demand to times with lower system demand or higher renewable energy production, or load flexibility, should be considered. Load flexibility can significantly reduce the generation capacity requirements and, in turn, potentially reduce the generation capacity buildout needed to meet policy mandates. For every one megawatt (MW) of peak load flexibility enabled, the amount of renewable capacity required is reduced by at least one MW and potentially much more.”

This technology is already available and ideally suited for large-load industrial processes such as the proposed Micron fab, presenting significant potential benefits and mitigation potential.<sup>52</sup> However, the DEIS fails to address the potential or importance of demand flexibility in avoiding significant spikes in fossil fuel demand.

While New York state is investing significantly in improved transmission lines and prioritizing renewable power generation to meet new demand growth and achieve renewable electricity targets, it is worth noting that the State Comptroller has identified that this build-out can negatively impact ratepayers. The costs of incentivizing renewable electricity development and transmission upgrades are borne almost entirely by New York’s utility customers through a charge per kilowatt-hour of electricity consumed. New York’s ratepayers already face among the highest charges on a state by state basis.<sup>53</sup>

While Micron’s plan includes provisions to support the improvement of state transmission lines directly to the facility, further improvements required at the state level to maintain and upgrade the grid will be borne by ratepayers and other electricity consumers. Micron is proposing no more than purchasing low-cost RECs, with no obligation to contribute to state renewable generation or grid infrastructure. This is unacceptable and contrary to CLCPA requirements.

**The DEIS fails to consider the project’s impact on New York’s attainment of its statutory renewable energy mandates, which are not advanced by Micron’s proposed purchase of RECs.**

Under the Climate Leadership Community Protection Act, by 2030, a minimum of 70% of the statewide electric generation secured by jurisdictional load serving entities to meet the electrical requirements of end-use customers in New York state “shall be generated by renewable energy systems,”<sup>54</sup> en route to achieving statewide greenhouse gas emission reductions of at least 85% below 1990 levels by 2050.<sup>55</sup> As discussed in the New York Public Service Commission’s order on the Biennial Review of the state’s Clean Energy Standard, New York has a considerable distance to go in achieving the 70% renewable

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<sup>52</sup> Johnston Anna, Fraser Archibald, and Dan York. 2024. “Enabling Industrial Demand Flexibility: Aligning Industrial Consumer and Grid Benefits.” American Council for an Energy-Efficient Economy White Paper: [https://www.aceee.org/sites/default/files/pdfs/enabling\\_industrial\\_demand\\_flexibility-aligning\\_industrial\\_consumer\\_and\\_grid\\_benefits.pdf](https://www.aceee.org/sites/default/files/pdfs/enabling_industrial_demand_flexibility-aligning_industrial_consumer_and_grid_benefits.pdf).

<sup>53</sup> New York State comptroller, Thomas P. DiNapoli. 2023. “Renewable Electricity in New York State: Review and Prospects.” <https://www.osc.ny.gov/files/reports/pdf/renewable-electricity-in-nys.pdf>.

<sup>54</sup> P.S.L. § 66-p(2)(a).

<sup>55</sup> Env. Conserv. L. § 75-0107(1)(b).

energy by 2030 mandate. As of 2022, renewable and zero-emission electric generation comprised only 46.1% of statewide load.<sup>56</sup>

The state's ability to reach 70% renewables has been challenged by a number of factors including global interest rates, inflation, supply chain pressures, transmission system inadequacies, interconnection delays, changes to capacity accreditation at the New York Independent System Operator, changes in federal incentives, siting complexities, and growing statewide electric load.<sup>57</sup>

Micron represents a massive new source of electricity demand in New York State and will further impede the state's efforts to achieve 70% renewable energy by 2030. Total retail electricity sales in 2023 were 139,422 GWh,<sup>58</sup> meaning that Micron's 15,673 GWh would represent 11.2% of New York's total electricity consumption. Introducing a single load that increases statewide electricity consumption by more than 11% has major implications for the state's ability to meet its climate and clean energy legal mandates, an issue the DEIS fails to adequately address.

To comply with the CLCPA's 70% renewable energy mandate, the state would need to procure an additional 10,971 GWh of renewable energy—70% of Micron's anticipated demand. Yet, the DEIS does not assess the environmental impacts of this additional energy development burden.

Micron's use of fossil fuels and the expansion of a natural gas line move New York further away from the CLCPA goals of 70% renewable energy by 2030 and 100% zero-emission energy by 2040. This appears to be a violation of the CLCPA. In addition, the DEIS fails to explain why Micron is not utilizing another form of energy, preferably renewable, rather than proceeding with a new gas line to the facility.

## **Renewable Energy Recommendations**

**Generate renewable energy and minimize contributions to the global climate emergency** - To meet Micron's 100% renewable energy commitment and comply with the NY State's requirement to significantly mitigate the factories' greenhouse gas emissions, the company must create a comprehensive plan to generate or purchase new renewable energy using wind, solar, and grid and storage infrastructure - without relying on the purchase of renewable energy credits.

The State of New York should incentivize the reduction of Micron's GHG process gas emissions by withholding incentives or imposing penalties for those emissions. If officials accept the project's GHG emissions are "unavoidable", Micron will effectively be granted a blank check to contribute significantly to climate change.

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<sup>56</sup> New York State Public Service Commission. 2025. "Order Adopting Clean Energy Standard Biennial Review as Final and Making Other Findings, Case 15-E-0302," P. 7, <https://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId=%7BF05ED596-0000-CF2F-A3A1-391B4DA423EA%7D>.

<sup>57</sup> *Id.* at 8.

<sup>58</sup> EIA. 2023. New York Electricity Profile. <https://www.eia.gov/electricity/state/newyork/>.

## **Additional Recommendations**

- Require 24/7 renewable electricity that meets criteria for temporal, location and additionality-based matching, to avoid contributing to fossil fuel late retirement and to safeguard New York’s climate goals.
- Incorporate load flexibility as key mitigation strategy to reduce grid strain and fossil fuel reliance.
- Eliminate the use of unbundled RECs entirely, as they do not deliver real emissions reductions or support new renewable generation.

## **SOLID WASTE, HAZARDOUS WASTE, AND HAZARDOUS MATERIALS**

### **High Level Takeaway**

Micron, like other semiconductor producers, has always utilized and released into the environment a wide range of hazardous substances. In fact, the industry introduces hazardous substances into wafer fabrication faster than researchers can determine their toxicity and government agencies can regulate them. The Clay environmental review provides an opportunity to address potential semiconductor pollution in advance.

Unfortunately, the draft Environmental Impact Statement (DEIS) is vague, providing the public and relevant agencies insufficient information to determine if best practices will be used to prevent human and environmental exposure to chemicals from the Micron factory.

While we understand that Micron cannot stop using hazardous substances that are intrinsic to production, the costs—health, environmental, and financial—of releases of these substances are borne by others. Micron, therefore, has an obligation to reduce the use of such substances and prevent their release into surface water, groundwater, and the atmosphere, as well as comply with state and federal regulations and statutes.

Furthermore, the sixteen-year-plus timeframe in the DEIS does not appear to provide a mandatory mechanism for updating the review, which is a material omission. The semiconductor industry is constantly upgrading its products and modifying its processes, so approval of the EIS should include a requirement for periodic updates to ensure that the potentially additional impacts from updated processes do not become significant.

Finally, the semiconductor industry, through organizations such as the Semiconductor Research Consortium, is sponsoring research with the objectives of understanding and addressing the potential environmental impacts of the use and release of PFAS “Forever Chemicals.” We believe that this is because the companies expect PFAS to be both monitored and regulated. Therefore, careful review and documentation, in the final EIS, of the current state of PFAS impacts of semiconductor production is key to a thorough assessment of the issue. Such an assessment would promote better management practices as well as beneficial substitution of other substances.

### **Failure to identify chemicals & quantities.**

The DEIS needs to include far more detail about what chemicals are being used by Micron. New York State has issued regulations specifying the content of an adequate EIS. NYCRR 617.9 (b)(1) states “ An EIS must assemble relevant and material facts upon which an agency's decision is to be made. It must analyze the significant adverse impacts and evaluate all reasonable alternatives.” The DEIS fails to meet this standard.

Table 3.8-9 (p. 3-242) lists various hazardous chemicals: flammable gases, pyrophoric gases, corrosives, toxic gases, oxidizers, asphyxiants, flammable liquids, and water reactive substances. (Pyrophoric chemicals spontaneously catch fire when exposed to air.) The DEIS needs to list the identity and quantities of these chemicals to properly define health and safety risks for both workers and the surrounding community. Moreover, the environmental impacts of a sudden release of hazardous chemicals can only be assessed if the identity and potential quantities are given in the EIS.

The Programmatic Environmental Impact Statement for Modernization and Expansion of Existing Semiconductor Fabrication Facilities offers an example of the level of detail needed in an EIS for a semiconductor fab, whether new or existing. Appendix D of said document has ten pages listing about 200 “representative” chemicals used by the semiconductor industry. All of these are listed under the Toxic Substances Control Act (TSCA).<sup>59</sup> NIST also offers specific information regarding hazardous chemicals used by the chips industry in Table 3.8-1, shown on the next page.<sup>60</sup>

In contrast, the DEIS (p. 3-244) lists *only* eight chemicals (ammonium hydroxide, anhydrous ammonia, hydrogen, hydrogen chloride, silane, chlorine, dichlorosilane, and HF) which meet the narrow definition of “extremely hazardous substances” above applicable threshold quantities given in 40 C.F.R. § 68.130. Fewer than ten other chemicals are mentioned on pages 3-237 and 3-239. This is completely inadequate for the agencies to analyze the significant adverse impacts. All of the chemicals used by Micron in its manufacturing process must be identified and approximate quantities provided.

Table 3.8-10 (DEIS, p.3-242) illustrates the inadequacy of the chemical information in the DEIS. This table, titled Hazardous Materials, reveals that 13.5 million gallons of “Liquid corrosives” will be stored at each fab. Critically, the type of corrosives is not identified. Sulfuric acid is a corrosive. So is ferric chloride. These pose completely different types of risk and environmental impacts. Therefore, the failure to specify the type of corrosives makes it impossible to provide a meaningful impact analysis.

This issue is repeated for all other categories of chemicals. For example, the DEIS lists 94,600 pounds of toxic gases stored at each fab but it is impossible to tell how toxic these “toxic gases” are. It is well established that the chips industry uses deadly gases like arsine, phosphine and nitrogen trifluoride (see e.g. NIST 2024, Table 3.7-1).<sup>61</sup> The DEIS needs to specify how much of these gases will be stored on site, and how they will be handled, to meet the requirements of NYCRR 617.9 (b)(1).

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<sup>59</sup>NIST. 2024. *Final Programmatic Environmental Assessment [PEA] for Modernization and Internal Expansion of Existing Semiconductor Fabrication Facilities under the CHIPS Incentives Program*, (Final PEA), CHIPS Program Office, June 28, p. C-13.  
<https://www.nist.gov/system/files/documents/2024/06/28/Final%20PEA%20for%20Modernization%20and%20Expansion%20of%20Semiconductor%20Fabs%206-28-2024%20-%20OGC-508C.pdf>

<sup>60</sup> NIST. 2024. *Final PEA...*” p. 70.

<sup>61</sup> NIST. 2024. *Final PEA...*” p. 70.

**Table 3.8-2. Hazardous Process Chemicals Used in Semiconductor Manufacturing**

| Chemical Category                            | Use(s)                                                                                                                                                                                       | Process Chemical                                                                           | Hazard Class                       |
|----------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------|------------------------------------|
| Aqueous solutions (commonly acids and bases) | To wet-etch or clean the surface of the wafer; as part of the photolithography process.                                                                                                      | Hydrochloric acid, HF, sulfuric acid, nitric acid, ammonium hydroxide, potassium hydroxide | 8 Corrosive Material               |
|                                              |                                                                                                                                                                                              | Ammonium fluoride                                                                          | 6.1 Poisonous Materials            |
|                                              |                                                                                                                                                                                              | Hydrogen peroxide                                                                          | 5.1 Oxidizer                       |
| Specialty gases                              | As precursors to deliver a substance such as arsenic or tungsten onto the wafer or into the silicon lattice (used in small quantities); to dry-etch a pattern onto the surface of the wafer. | Silane                                                                                     | 2.1 Flammable Gas                  |
|                                              |                                                                                                                                                                                              | Ammonia, nitrogen trifluoride, sulfur hexafluoride                                         | 2.2 Non-Flammable Compressed Gas   |
|                                              |                                                                                                                                                                                              | Ammonia, phosphine, tungsten hexafluoride, arsine, CO, fluorine, chlorine, diborane        | 2.3 Poisonous Gas                  |
| Organic compounds (commonly solvents)        | As constituents in specialty chemicals; to clean the wafer; as part of the photolithography process.                                                                                         | Isopropanol, xylene, propylene glycol ethers, acetone                                      | 3 Flammable and Combustible Liquid |
| Metallic compounds                           | Applied to the wafer in specific locations to create transistors; to plate wafers to provide electrical connections.                                                                         | Copper sulfate                                                                             | 9 Miscellaneous Hazardous Material |

Sources: ISMI, 2006; 49 C.F.R. Part 172; EPA, 2022a.

The DEIS says Micron will request “detailed chemical constituent documentation from its chemical vendors, including PFAS content. Those vendors often require a non-disclosure agreements before divulging such information.”<sup>62</sup> Here, such non-disclosure is unacceptable. The public has a right to know the identity of hazardous substances used and released in their communities. Most assuredly, Micron’s competitors rely on the same chemical suppliers, so it’s difficult to justify anything but full disclosure of the constituents of the industry’s process and product chemicals.

### Forever Chemicals

The DEIS language on per-and polyfluoroalkyl substances (PFAS) “forever chemicals” is sketchy and general, providing no information about the types of PFAS to be used and/or discharged from the facility. PFAS constitute a large class of over 12,000 fluorinated chemicals that have gained notoriety due to their

<sup>62</sup> *Micron Semiconductor Manufacturing Project, Clay, NY Draft Environmental Impact Statement, (DEIS)CHIPS Program Office and Onondaga County Industrial Development Agency, June, 2025, EISX-006-55-CPO-001, p. 3-240. <https://ongovod.com/wp-content/uploads/2025/06/Micron-Draft-EIS.pdf>.*

persistence, their ability to accumulate in the bodies of human beings and wildlife, and their toxicity. The CHIPS Program Office PEA (2024) in its *Final Programmatic Environmental Assessment for the Modernization and Expansion of Existing Semiconductor Fabrication Facilities* contains considerable detail about the use of PFAS in wafer fabrication. It reported, “Semiconductor manufacturers use PFAS as an essential material in multiple steps in the fabrication process.”<sup>63</sup> However, the entire semiconductor industry, including Micron, has stopped using PFOA and PFOS, the only two PFAS with federal drinking water standards. Appendix C of that document includes a 10-page table listing the numerous types of PFAS used by the semiconductor industry. The DEIS must be revised to include far greater detail about the types and quantities of PFAS used in the Micron fabs to facilitate a thorough assessment of their likely impact.

Regulation of PFAS has not caught up to the reality that hundreds of types of PFAS are employed in modern chip manufacturing. Most regulations are focused on just two types of PFAS: perfluorooctanoic acid (PFOA) and perfluorooctane sulfonate (PFOS). The state of New York and USEPA have issued drinking water standards only for these two types of PFAS.<sup>64</sup> NY state has also issued drinking water quality guidelines for PFOA and PFOS only.<sup>65</sup>

However, these types of PFAS are no longer used by the chips industry. As noted in CHIPS (2024; p. C-15), “Long-chain PFAS compounds, such as PFOS, have been replaced by short-chain PFAS. Another long-chain PFAS, PFOA, was phased out in the United States by 2015 and is projected to be eliminated globally by 2025.”<sup>66</sup>

### **Treatment of PFAS in wastewater**

Wastewater generated at Micron’s facility will be treated in a pre-treatment system on the Micron campus, and portions thereof sent to a specialized facility owned and operated by Onondaga County: “Industrial wastewater generated on the Micron Campus that is not treated at the campus for reuse would be sent as secondary residual wastewater via the wastewater conveyance to the IWWTP at the Oak Orchard Site. For compliance with ECL Article 17 (6 NYCRR Part 750), the IWWTP would be required to obtain an individual SPDES permit issued by NYSDEC to permit discharge of treated industrial wastewater into surface waters associated with the Oneida River.” (DEIS, p. 3-83).

The DEIS (p. 3-83) acknowledges that the wastewater sent to the IWWTP will contain PFAS, since the “IWWTP also would include technologies specifically designed to remove emerging contaminants, such as per- and polyfluoroalkyl substances (PFAS), including reverse osmosis and nanofiltration ... granular activated carbon ..., ion exchange resins ... and advanced oxidation processes.... To comply with its SPDES permit for the IWWTP, OCDWEP would be required to perform regular analytical testing of surface water and effluent samples collected using NYSDEC-approved methods and would be subject to ongoing sampling, monitoring, and reporting requirements.”

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<sup>63</sup> NIST. 2024. *Final PEA...*”

<sup>64</sup> NYS Dept of Health. 2024. “Public Water Systems and New York State Drinking Water Standards for PFAS and Other Emerging Contaminants.” Center for Environmental Health. [https://www.health.ny.gov/environmental/water/drinking/docs/water\\_supplier\\_fact\\_sheet\\_new\\_mcls.pdf](https://www.health.ny.gov/environmental/water/drinking/docs/water_supplier_fact_sheet_new_mcls.pdf).

<sup>65</sup> NYS Dept of Environ. Conservation. 2023. “2023 ADDENDUM TO JUNE 1998 DIVISION OF WATER TECHNICAL AND OPERATIONAL GUIDANCE SERIES (TOGS) NO. 1.1.1.” [https://extapps.dec.ny.gov/docs/water\\_pdf/togs111addendum2023.pdf](https://extapps.dec.ny.gov/docs/water_pdf/togs111addendum2023.pdf)

<sup>66</sup> EPA, 2022; WSC, 2023.

The DEIS claims that “Based on these measures, industrial wastewater discharges from operation of the IWWTP would not be anticipated to result in significant adverse effects on water resources outside the mixing zone.”

This claim is false for several reasons. First, NYSDEC-approved analytical methods, namely USEPA draft Method 1633, only measures 40 types of PFAS. Research conducted at Cornell University<sup>67</sup> and elsewhere<sup>68, 69</sup> demonstrates that wastewater created by semiconductor manufacturing contains potentially hundreds of different types of PFAS. In particular, the study noted that, “Nontarget analysis revealed the presence of 41 homologous series of PFASs comprising 133 homologues.”<sup>70</sup> Of these, a fraction can be identified using sophisticated analytical techniques. The remainder are “non-target” PFAS which can constitute a significant fraction of the total mass of PFAS in the wastewater. The same study found that concentrations of non-targeted PFAS—that is, chemicals not detected using official analytic methods—significantly exceed the concentrations of known, “targeted” compounds in chip plant effluent. Furthermore, wastewater may include transformation products not found in chemical inputs. It is important to recognize that one type of “forever chemicals” may transform into other “forever chemicals.” Micron must test its wastewater using a combination of methods for the whole range of PFAS that may be present.

Second, the claim that, by treating the wastewater, that there will not be “significant adverse effects on water resources outside the mixing zone” is based on the false assumption that dilution of PFAS will eliminate their ill effects. Nothing could be further from the truth. PFAS are called “forever chemicals” because they do not break down in the environment. PFAS are known to bioaccumulate in humans, animals, and in some cases, plants. The CHIPS PEA (2024; p. C-15) states that “Wastewater discharge from semiconductor fabrication facilities presents a substantial risk for PFAS contamination of the environment.”

The treated wastewater will be discharged to the Oneida River, which merges with the Seneca River to become the Oswego River, which discharges into Lake Ontario. The Onondaga County Water Authority, along with many other water suppliers around this great lake, draws its water supply from Lake Ontario. PFAS which is discharged in Micron’s treated wastewater will eventually contaminate Lake Ontario and potentially the OCWA drinking water supply.

The CHIPS PEA explains that “most facilities send 100 percent of TARC [Top Anti-Reflective Coating] waste to industrial wastewater drains, unless segregated in a separate drain and collection system for disposal. TARCs currently account for over 50 percent of total PFAS used in photolithographic processes worldwide and thus contribute a large portion of the PFAS found in wastewater discharges.”<sup>71</sup>

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<sup>67</sup> Jacob et al. 2021. “Target and Nontarget Analysis of Per- and Polyfluoroalkyl Substances...”

<sup>68</sup> Biting Qiao *et al.* 2025. “Nontarget Screening and Occurrence of Emerging Per- and Polyfluoroalkyl Substances in Municipal and Semiconductor Industrial Wastewater: A Large-Scale Survey in China,” *Environmental Science & Technology*. May 6, p. J. <https://doi.org/10.1021/acs.est.5c02035>.

<sup>69</sup> Roger Brewer. 2025 “Testing and Risk Assessment of Complex Mixtures of PFASs in Wastewater and Sludges.” Healthy Water Solutions, May 2025. <https://www.youtube.com/watch?v=AqNNY3F358o>.

<sup>70</sup> Biting Qiao, *et al.* *Environ. Science & Technol.*

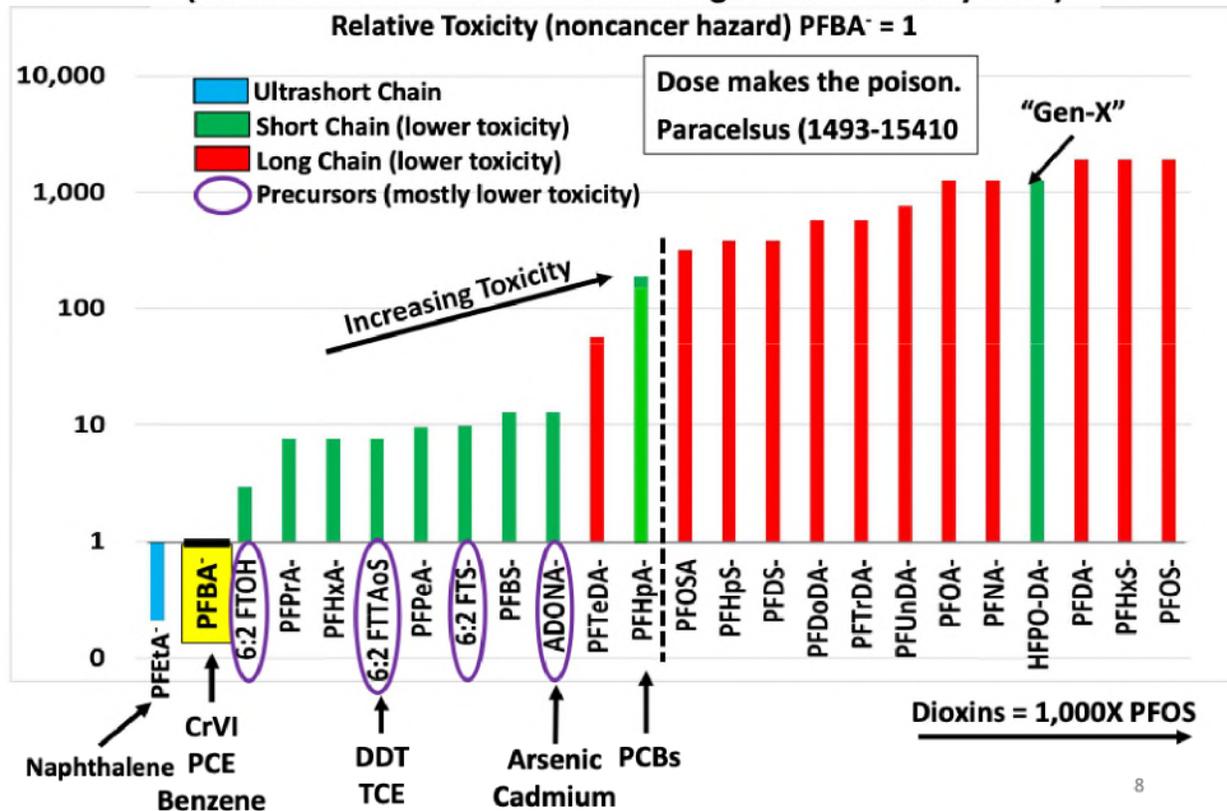
<sup>71</sup> NIST. 2024. *Final Programmatic Environmental Assessment*. p. C-15.

Micron’s approach to PFAS treatment is also discussed on page 3-241: “Early evaluations suggest that the most effective wastewater treatment solution for the Proposed Project will involve installation of PFAS segregation technology targeted to the relevant process wastewater streams. Micron’s final design will include wastewater treatment for regulated PFAS-containing wastewater that meets current regulatory requirements under New York and Federal law prior to discharge to the IWWTP.”

Micron is correct to segregate process wastewater streams that contain PFAS. However, to mitigate the serious environmental harms created by discharges of PFAS via wastewater, Micron needs to do more than “meet current regulatory requirements.” As explained above, current regulatory requirements are **not protective of the environment** because they do not address the hundreds of persistent and toxic PFAS found in the semiconductor industry’s wastewater. Micron needs to install at its pre-treatment plant or cause to be installed at the Onondaga County plant, state-of-the art treatment technology (such as reverse osmosis, advanced oxidation, surface plasma treatment) which completely eliminates the entire range of PFAS compounds. It then needs to monitor performance of the treatment system using sophisticated analytical technologies to demonstrate its effectiveness.

The DEIS (p.3-241) states “Micron would dispose of or otherwise manage waste known to contain regulated PFAS in accordance with applicable regulations and as appropriate given its content and characteristics.” Again, current regulatory requirements are not protective of the environment and mere assurances of regulatory compliance are insufficient to ensure that there will be no significant impacts

## Relative PFAS Toxicity (noncancer Reference Dose) (based on references in HIDOH PFAS guidance February 2025)



Furthermore, while the *persistence* of all forever chemicals is a given because of the strong carbon-fluorine bond, the *toxicity* of most of them varies, and for many, it is largely unknown. The state of Hawaii prepared the following chart, showing the relative non-cancer risk of several PFAS compounds. In general, it shows that short-chain PFAS—that is, where the molecules have fewer carbons than long-chain PFAS such as PFOA and PFOS—tend to be less toxic than PFOA and PFOS. However, they are still as toxic as other well-known contaminants of concern. And one PFAS found widely in the environment and chip plant wastewater, HPFO-DA (also known as Gen-X) ranks with the long-chain compounds even though it has fewer carbons per molecule. Thus, concludes Roger Brewer, to adequately assess the risk of PFAS exposure, one must measure all PFAS in mixtures, not just the top two or even EPA’s target list.<sup>72</sup>

Supporting Brewer’s findings, decades of research have shown that exposure to mixtures of different PFAS chemicals can result in cumulative adverse health effects. Even if the individual chemicals are at levels considered to be “safe,” a mixture may cause significant adverse health effects. EPA recognized this in developing the Hazard Index approach to Safe Drinking Water Act limits on four PFAS, which states, “The high likelihood for different PFAS to co-occur in drinking water; the additive health concerns when present in mixtures; the diversity and sheer number of PFAS; and their general presence and persistence in the environment and the human body are reflective of the environmental and public health

<sup>72</sup> Roger Brewer. 2025.

challenges the American public faces with PFAS, which poses a particular threat for overburdened communities that experience disproportionate environmental impacts.”<sup>73</sup>

The DEIS reports, “The IWWTP [Industrial Wastewater Treatment Plant] also would include technologies specifically designed to remove emerging contaminants, such as per- and polyfluoroalkyl substances (PFAS), including reverse osmosis and nanofiltration (membranes used to filter out PFAS, effectively removing them from the water), granular activated carbon (an effective method for removing PFAS through adsorption), ion exchange resins (which selectively capture and remove PFAS from wastewater)...” (p. 3-83). Including such a statement in the DEIS does not guarantee the adequacy and reliability of the treatment technologies. Their effectiveness depends upon the other constituents of the waste stream, water volume, and PFAS concentrations. There is no single best method for removal, and none of the filtration methods actually destroys PFAS.

While other factors may influence the choice of technology, the starting point should be the measurement of all PFAS in source wastewater as well as removal system effluent. The DEIS promises, “To comply with its SPDES permit for the IWWTP, OCDWEP [Onondaga County Department of Water Environment Protection] would be required to perform regular analytical testing of surface water and effluent samples collected using NYSDEC-approved methods and would be subject to ongoing sampling, monitoring, and reporting requirements.” (p. 3-84). The same requirements would apply to Micron’s wastewater pretreatment system, governed by an indirect discharge permit negotiated with the OCDWEP.

To measure PFAS in wastewater, Qiao *et al* recommend using the TOP [Total Oxidizable Precursor] Assay method: “The TOP assay results emphasize the importance of implementing an integrated PFAS monitoring strategy that incorporates the TOP assay, along with routine monitoring of ultrashort-chain PFAS (e.g., TFA and PFPrA).”<sup>74</sup> Going further, Jacob et al concluded: “However, this [the elevated levels of combined target and non-target PFAS] does reinforce the idea that PFAS monitoring should incorporate complementary target and nontarget analyses or otherwise include measures of total organic fluorine to accurately assess PFAS abundance and potential environmental impacts. These data also support the recent push by policymakers to regulate total PFASs, rather than individual compounds, underscoring the importance of total PFAS concentration monitoring.”<sup>75</sup>

To understand how to address wastewater from the Micron Clay facility, the company and agencies need not wait for production to begin. Micron’s new fab in Boise, Idaho will be using the same or similar chemicals. The New York’s evaluation could and should begin with analysis of Boise effluent.<sup>76</sup>

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<sup>73</sup> U.S. Environmental Protection Agency (EPA). 2024. “Per- and polyfluoroalkyl substances (PFAS): Perfluorooctanoic acid (PFOA) and Perfluorooctanesulfonic acid (PFOS) National Primary Drinking Water Regulation Rulemaking.” EPA-HQ-OW-2022-0114. June 25.

<sup>74</sup> Biting Qiao, et al. 2025.

<sup>75</sup> Jacob, P, K. Barzen-Hanson, and D. Helbling. 2021. “Target and Nontarget Analysis of Per-and Polyfluoroalkyl Substances in Wastewater from Electronics Fabrication Facilities.” *Environmental Science & Technology*, February 16, p. 2353. <https://pubs.acs.org/doi/10.1021/acs.est.0c06690p>.

<sup>76</sup> National Institute of Standards and Technology .2024. *Draft Environmental Assessment for Micron ID1, Boise, Idaho*. NIST-CPO/EA-004, dated July 10. U.S. Department of Commerce, National Institute of Standards and Technology, CHIPS Program Office. Washington DC.

It is unclear in the DEIS why OCDWEP is taking on the difficult task of treating PFAS contaminated wastewater. As far as we are aware, OCDWEP has no existing expertise in this area while Micron operates a number of chip production facilities where it must already deal with similar wastewaters. Outsourcing the treatment responsibility leads to the danger that Micron will evade responsibility for any discharge of PFAS and be subsidized if OCDWEP fails to charge Micron the full cost of treatment. Surely a simpler and more efficient arrangement would be locating the treatment plant close to the fab and have Micron manage it? At minimum, this should have been one of the alternatives included in the analysis of alternatives.

It is problematic that a county agency is being left with the lion's share of the responsibility for a difficult, almost impossible task of sufficiently treating wastewater to avoid harmful downstream impacts from the Proposed Project's activities. Can this agency realistically be expected to maintain the level of resources and expertise over the long life of the fab to prevent significant downstream harms? Micron should be required to bear the responsibility, financially and otherwise, of ensuring fully functioning, regularly updated waste water treatment systems are in place.

The bottom line is that Micron will be using and potentially discharging a wide range of PFAS, only a few of which are identified, and none of which are currently regulated. Much more information is required to assure the public, as well as officials, that Micron will not significantly impact the environment by adding PFAS to the already PFAS-contaminated environment. Furthermore, Micron should adopt more protective PFAS management than what is promised in the draft EIS. We recommend that All PFAS discharge pathways from the Micron plant should be monitored and eliminated. The Oak Orchard plants and Micron should commit to using, and the New York State Department of Environmental Conservation should require, sampling and analysis methods that capture all PFAS in wastewater from Micron, starting with samples from the Micron Boise plant.

In addition to the removal technologies cited above, the DEIS reports:

“Micron also would segregate process solvent waste containing PFAS from facility wastewater streams to closed bulk storage systems for off-site management by licensed and permitted treatment and disposal facilities.... Micron would dispose of or otherwise manage waste known to contain regulated PFAS in accordance with applicable regulations and as appropriate given its content and characteristics.” (p. 3-341). The DEIS names Veolia, all of whose disposal facilities are outside of New York State, as the primary waste disposal vendor.

Even if Micron is able to segregate a portion of its PFAS-laden wastewater, these provisions are inadequate. First, there is no assurance that the permitted treatment and disposal facilities—likely incinerators located in communities of color—would destroy the particular mixtures transferred from the Micron plant without creating toxic transformation products. In fact, mixing chipmaking wastes with other hazardous wastes would increase the likelihood that new hazardous substances would be emitted. If such off-site “disposal” is allowed, Micron should be responsible for proving that PFAS and other hazardous substances from its waste streams, such as solvents, are destroyed. It should also be required to show that thermal treatment does not create hazardous products of incomplete combustion.

The DEIS promises, “Micron would continue to review the waste and reuse facilities to which it would send hazardous waste,” (p. 3-353) but there is insufficient detail to assure the public and regulators that PFAS, PFAS-containing media, and PFAS byproducts will be destroyed safely.

Second, the promise to comply with regulations is hollow. Of course, Micron should be expected to obey the law. However, we are unaware of any regulations governing the treatment and disposal of collected PFAS wastes, particularly when they are shipped out of state.

Similarly, removal technologies such as Granular Activated Charcoal, Anion Exchange Resins, and Foam Fractionation do not destroy PFAS. In general, the filtration media and gas emissions contain essentially the same PFAS that were contained in the original liquid. The filtration media are typically sent off site for landfilling or thermal treatment, neither of which is environmentally acceptable.

Fortunately, the federal government, through the Department of Defense, has been supporting the development of new technologies that actually destroy PFAS, breaking down the otherwise persistent molecules into non-toxic substances. The DEIS actually mentions one category of these technologies, Advanced Oxidation. These technologies may either treat the wastewater directly or destroy concentrated PFAS removed from wastewater through technologies such as foam fractionation. Use of these technologies is the most protective approach to treating wastewater that contains a wide range of PFAS compounds. Again, at minimum, this approach should be included in the analysis of alternatives.

### **Recommendation**

Micron should commit to, and NYSDEC should require that Micron evaluate available PFAS destruction technologies for use on site with the goal of implementing one or more as close to the points of use as feasible. NYS DEC should regulate these systems.

The goal of any program of removal, treatment, or destruction for PFAS should be ZERO releases, as much as practical. That is, technologies, not numerical standards—which do not exist—should be the basis of the approach to eliminating PFAS in chipmaking wastewater.

The DEIS points out that New York state has guidance values for PFOA and PFOS in “raw water.” However, there are no standards for the PFAS that Micron will actually be using. In fact, even in the best of cases there will not be standards or guidance values for the preponderance of PFAS used or released by Micron.

Yet current science demonstrates that all PFAS are toxic as well as persistent. Any release of PFAS into the environment adds to the already unacceptable load on the environment and human health.

### **Extremely Hazardous Substances**

The DEIS states, “Pending further review based on evolving Micron Campus designs, Micron would expect the RMP [Risk Management Plan] to cover eight regulated chemicals (ammonium hydroxide, anhydrous ammonia, hydrogen, hydrogen chloride, silane, chlorine, dichlorosilane, and HF [hydrogen fluoride]) and would evaluate and add additional chemicals to the RMP on a case-by-case basis.” Earlier it mentions sodium hydroxide, and it promises, “hazardous chemicals and materials would be properly stored in containers and drums in storage areas with secondary containment to provide added protection in

the event of a spill or release.” (pp. 341-344). This is a good start, but insufficient. Leaks and spills may still occur during transport or use, so it’s important that employees, neighbors, and government agencies be fully aware of the presence of extremely hazardous substances.

Semiconductor fabs typically also use arsine and phosphine, which are extremely toxic, even lethal, gases, and diborane, which is highly toxic and pyrophoric. Perhaps they aren’t mentioned because the DEIS uses EPA’s reporting thresholds, which are generally an order of magnitude less protective than California’s.<sup>77</sup> Even in low volumes, a leak or spill of extremely toxic gases may necessitate the evacuation of buildings as well as warnings to nearby properties.

This information is important to be included in the environmental review, because local planners need to know how close sensitive uses should be located to the potential toxic release site. For example, in Mountain View, California, the city banned childcare centers in parts of town with semiconductor production.

The DEIS reports, “Clay Fire and Cicero Fire coordinate with the City of Syracuse Fire Department for responses to incidents involving potential hazardous materials, as the Syracuse Fire Department employs a specialty hazardous material response unit.” ( p. 560). More detail should be provided. Does the Syracuse Fire Department have the expertise to handle the emergencies associated with semiconductor manufacturing? How close, by both time and distance, are personnel and equipment from the specialty unit to the Micron campus? Will the responsible first responders be trained and equipped to respond to emergencies at Micron? We cannot meaningfully comment on this aspect of the DEIS without the answers to these questions.

### **Recommendations**

The final Micron EIS should include a complete list of extremely hazardous substances expected to be used on the property, regardless of anticipated quantity. The public has a right to know even if the federal thresholds for storage are not exceeded.

Micron should conduct dispersion modeling for the most hazardous of the gases and include it in the final EIS, to guide decisions on the location of sensitive use. For example, would an arsine release from Micron put children at its nearby childcare center at risk?

### **Other Hazardous Substances**

Other than the extremely hazardous substances mentioned above, the DEIS does not specifically name hazardous chemicals. The Final PEA, on the other hand, contains a short list in Section 3.8 and a longer list in Appendix D. (p. 560).

The DEIS does not address the long-standing environmental threat caused by solvents used in production. Once again, the Final PEA provided more detail: “For example, traditional solvents used in fab cleaning

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<sup>77</sup> Compare the tables as “CalARP Program Resources,” viewed July, 2025.  
<https://calepa.ca.gov/california-accidental-release-prevention/california-accidental-release-prevention-program-resources/>.

processes contain N-Methylpyrrolidone (NMP), which is known to cause harm to reproductive systems.”<sup>78</sup> It noted that some companies—in this case a Taiwan-based producer—was using alternatives.

### **Catastrophic impact due to spill, leak, or equipment failure.**

As noted, the DEIS includes very superficial discussion about spills, accidental releases and system upsets that can result in contamination of building interior spaces, the underlying soil, the groundwater and surface water. It is clear even from the limited information about stored chemicals given in Table 3.8-10 (DEIS, p.3-242) that large quantities of chemicals will be stored at the site. The table lists these categories of hazardous liquids (rounded to nearest 1000 gallons):

- Acidic Solutions: 172,900 gallons/fab x 4 fabs = 692,000 gal
- Caustic Solutions: 82,300 gallons/fab x 4 fabs = 329,000 gal
- “Liquid Corrosives:” 13.5 million gal/fab x 4 fabs = 52 million gal
- Flammable liquids: 121,900 gallons/fab x 4 fabs = 488,000 gal
- Peroxide: 124,000 gallons/fab x 4 fabs = 496,000 gal

In addition, the DEIS (p. 3-244) states that the “Micron Campus would have an aggregate aboveground oil or petroleum product storage capacity of approximately 1.55 million gallons, which would store diesel, gasoline, lubricating oil, hydraulic fluid, ...”

Altogether, over 55 million gallons of hazardous liquid chemicals and petroleum products could be stored on site once the four fabs are completed and operational. Of course, these chemicals are not simply stored. They must be transported to the site, transferred into storage tanks, or loaded into drum storage space; distributed to manufacturing areas; and dispensed as needed. Wastes need to be collected, containerized, and properly recycled, treated, and/or shipped off-site for disposal.

The DEIS (p. 3-80) states that groundwater contamination is not an issue during construction, asserting that “Micron would implement a SWPPP and SPCC/SPR [Spill Prevention Control and Countermeasure Plan and Spill Prevention Report] to reduce the risk of accidental releases, leaks, or spills of materials such as concrete, oil, fuel, lubricants, or hydraulic fluids during construction and provide for immediate containment and cleanup of any release.” The same language is applied to operations at the facility: “Micron also would be required to implement SWPPP and SPCC/SPR Plan measures to reduce the risk of accidental releases, leaks, or spills during facility operations and provide for immediate containment and cleanup of any release.” DEIS (p. 3-86). But accidents and spills do not necessarily go according to plan and containment is never “immediate.” To fully evaluate this issue, the EIS needs to assess the actual risk of spills, especially when chemicals are being transported to the facility, and when waste chemicals are being transported away from the facility.

The DEIS (p. 3-243) informs us that “Chemicals would be delivered to the Micron Campus by truck ... using a variety of packaging and containment methods, including tanks, drums, and pallets... Micron would contract with carriers and shippers of hazardous materials that maintain 24/7 emergency response support in the event of hazardous materials spills...” Trucks will be travelling on highways, competing

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<sup>78</sup> *Final PEA*, p. 69.

with construction vehicles, employee vehicles, delivery vehicles, and vehicles of Clay and Cicero residents. The risk of accidents on these congested roadways is relatively high. How long would it take for a national chemical carrier to respond to an accident involving a spill?

We recommend that Micron reduce the potential for vehicular accidents by shipping the bulk of its chemical supplies by rail. It does not appear that this mitigation of spill risk has been considered. Once again, study of this alternative is essential to minimize the potential environmental impacts from the Micron fab.

The DEIS recognizes the susceptibility of the local groundwater to contamination in Section 4. Cumulative Effects. On p. 4-16 it states: “ It can be assumed that planned residential, industrial, and transportation development, along with the implementation of the Proposed Action and Connected Actions could reasonably ...[lead to] the increased risk of groundwater exposure to pollutants from spills or leaks, or from contaminated stormwater runoff.” The DEIS notes further that “surficial aquifers are *highly permeable* and could become contaminated from overlying *spills, leaks, or infiltration*, and *carbonate aquifers can transport groundwater long distances through solution openings, potentially transporting contamination on a regional scale*. Ultimately, depending on the severity of potential groundwater exposure to contaminants, *impacts could be significant and widespread*.” (emphasis added)

But the DEIS does not address, in any substantive way, the potential for spills, leaks and infiltration from the operations at the Micron facility to contaminate the local groundwater, and for that groundwater to transport contaminants long distances. Fox Professional Geology PLLC (2025) asserts in comments submitted regarding this Proposed Action that “The Micron Campus is located directly over a highly productive karst bedrock aquifer.” Fox makes the comment that “The presence of karst features on, beneath, and near the Micron Campus, including closed circular depressions and solution-enlarged joints and fracture zones, requires careful and thorough consideration, evaluation, planning, and monitoring to facilitate protection of human health, built structures, water quality, and the environment.” This level of analysis has been regrettably omitted from the DEIS, but it needs to be incorporated.

### **Recommendation**

The DEIS should provide a complete list of hazardous substances used in production, their function, and possible exposure pathways. Once again, the public has a right to know which hazards are present and may be released from semiconductor production.

### **Cumulative Effects**

The DEIS fails to assess the cumulative impacts of PFAS, industrial Greenhouse Gases, and Extremely Hazardous Substances in its Cumulative Effects analysis. The Micron project is expected to attract related activities, including research and development, chemical suppliers, and even competitors to the area. That is, other facilities may release hazardous substances to the environment, and in particular to Onondaga County’s wastewater system, in addition to the PFAS discharges from other, unrelated industries.

Therefore, the DEIS should analyze and mitigate for the cumulative impacts associated with hazardous substance use, storage, and release. Without a comprehensive understanding of the types and amount of PFAS discharges on site and for anticipated sites across the region, cumulative impacts for surface water, groundwater, air emissions, and environmental justice cannot be understood.

## Recommendation

The DEIS should include a comprehensive analysis of the cumulative impacts of Micron's PFAS discharges to the environment, with a focus on the releases to the Oak Orchard wastewater plants and, in turn, to surface water and wastewater biosolids. As stated earlier, Micron should commit to zero discharge of all PFAS, and its industrial pre-treatment permit should make this an enforceable requirement. Because the cumulative impacts are regional in nature, the environmental justice assessment (Section 3.16) should consider these regional impacts.

## In Summary

The draft Environmental Impact Statement for Micron New York contains valuable information, but in the case of hazardous substances it does not provide enough detail to satisfy the public's right to know or to guide decisions designed to protect worker health, public health, and the environment. Furthermore, over the course of the sixteen-year the Micron project is expected to constantly update its production technology, introducing new, un-assessed, process chemicals. In addition, there will be advances in environmental analysis and treatment. Therefore, there should be a mechanism to revisit key elements of the EIS. That is, impact analysis and the protection of workers, neighbors, and the environment should keep up with the remarkable progress of semiconductor chips and their applications.

## Fluoropolymers

Much of the equipment in semiconductor wafer fabrication is made from fluoropolymers, such as PFA, relatively stable but still hazardous PFAS. They represent a massive use of these persistent materials. Mark Newman, CEO of Chemours, explained:

“You cannot make chips without a whole PFA infrastructure,” he said. “We estimate that in a modern-day fab, there's a half-kilo of PFA in every square foot. So in a 400,000- to 600,000-square-foot fab, that's 200 to 300 metric tons of this stuff.” It's not just valves, of course, but all types of pipes, tubes and pumps in semiconductor equipment.<sup>79</sup>

The article continues, “On its website, Chemours says flat-out that “without PFA, domestic semiconductor manufacturing would not be possible.”

Chemours is the only domestic producer of PFA. In fact, in 2024 it announced the expansion of its notorious Washington Works plant in West Virginia to meet increased demand from the semiconductor industry.<sup>80</sup>

Fluoropolymers are particularly hazardous where they are manufactured, and at the end of their useful life. Lohmann *et al* concluded:

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<sup>79</sup> Feldman, Amy. 2023. “More Domestic Chip-Making Means More ‘Forever Chemicals,’” *Forbes*, October 5. <https://www.forbes.com/sites/amyfeldman/2023/10/05/more-domestic-chip-making-means-more-forever-chemicals/>

<sup>80</sup> Samora, Sara. 2024. “Chemours expands Teflon PFA production in West Virginia.” *Manufacturing Dive*, August 22. <https://www.manufacturingdive.com/news/chemours-plans-teflon-pfa-forever-chemicals-plant-expansion-west-virginia/724609/>.

The evidence reviewed in this analysis does not find a scientific rationale for concluding that fluoropolymers are of low concern for environmental and human health. Given fluoropolymers' extreme persistence; emissions associated with their production, use, and disposal; and a high likelihood for human exposure to PFAS, their production and uses should be curtailed except in cases of essential uses.<sup>81</sup>

Furthermore, the semiconductor industry has introduced and embedded a wide variety of PFAS into semiconductor packaging and packages with no consideration of the potential environmental and worker safety risks. Chipmakers have little idea how much of which PFAS are contained in their final products. In fact, they admit that the absence of regulation is responsible for their lack of knowledge of the use of these chemicals. Chips produced at the Micron plant may end up in such packages. Since those products end up distributed in electronic equipment throughout the country and the world, there is no accounting of the environmental impacts of their disposal when no longer used. The Semiconductor Industry PFAS Consortium speculated, "it is unknown if end of life controls are necessary during the reclamation of electronic products."<sup>82</sup> In fact, the safe disposal of electronic equipment in general is a significant unsolved environmental problem.

### **Recommendations**

The final EIS should contain an estimate of the quantities of fluoropolymers in each Micron fab, by category of use. It should also contain a life-cycle analysis of the environmental impacts of fluoropolymers, including:

1. Analysis of the environmental releases and occupational exposures at fluoropolymer production plants. Since Chemours uses the "essentiality" of its products to the semiconductor industry to justify continuing, indeed expanded production of PFA, chipmakers should be held accountable for those environmental impacts.
2. Analysis of any Micron on-site releases caused by the use or machining of fluoropolymers.
3. Information about the likely end-of-life impacts from the fluoropolymer-containing equipment used at the Micron plant.
4. Information about the use and release of fluoropolymers in packaging the chips produced from wafers fabricated at Micron, as well as their end-of-life environmental impacts.

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<sup>81</sup> Lohmann, Rainer, *et al.* 2020. "Are Fluoropolymers Really of Low Concern for Human and Environmental Health and Separate from Other PFAS?" *Environmental Science & Technology*, October 12. <https://dx.doi.org/10.1021/acs.est.0c03244>.

<sup>82</sup> "PFAS-Containing Materials Used in Semiconductor Manufacturing Assembly Test Packaging and Substrate Processes." Semiconductor PFAS Consortium Assembly, Test, Packaging and Substrates Working Group, June 2, 2023. <https://www.semiconductors.org/pfas-containing-materials-used-in-semiconductor-manufacturing-assembly-test-packaging-and-substrate-processes/>.

### Excavation of the site for construction

As discussed in the Wetlands and Wildlife section of this comment, the DEIS (pp 3-224 et seq) notes that the construction of the facility will require excavating over 1.6 million cubic yards (2.70 to 3.67 million total tons) of soil and muck from the existing wetlands and fields at the WPCP. This material is designated for “beneficial reuse.”

Micron should coordinate with the Wetlands Trust to see whether this material which is rich in wetland plant seeds, spores, and microorganisms could be utilized to create new wetlands as part of the wetlands mitigation plan. This would minimize long-distance transport of this huge amount of material, and could accelerate the establishment of new wetlands.

### Commercial Solid Wastes

It is anticipated that the Micron facility would generate substantial amounts of Commercial Solid Waste and wastes that could be potentially recycled. The waste quantities are summarized in Table 3.9-4, shown below:

| Material                                      | Disposal Method <sup>82</sup>                                            | Fab 1  | Fabs 1-2 | Fabs 1-3 | Fabs 1-4 |
|-----------------------------------------------|--------------------------------------------------------------------------|--------|----------|----------|----------|
| <b>Solid Waste</b>                            |                                                                          |        |          |          |          |
| Industrial waste (tpy)                        | Private hauler transport to private industrial waste disposal facilities | 800    | 1,300    | 1,800    | 2,300    |
| Commercial MSW (tpy)                          | Private hauler transport to municipally owned waste disposal facilities  | 15,800 | 25,000   | 34,300   | 43,500   |
| General MSW (tpy)                             | Private hauler transport to municipally owned waste disposal facilities  | N/A    | N/A      | N/A      | N/A      |
| RMW (30-gallon bins per year) <sup>83</sup>   | Private hauler transport to RMW disposal facilities                      | 11     | 22       | 34       | 45       |
| <b>Reusable or Recyclable Material</b>        |                                                                          |        |          |          |          |
| Micron RRR or other recyclable material (tpy) | (See Table 3.8-5 below)                                                  | 32,200 | 51,100   | 70,000   | 88,800   |

The Commercial Solid Waste is characterized as “metals, drums and cylinders, E-waste, batteries, plastic, foam, cardboard, scrap wood, office supplies, etc.” (p. 3-233) The DEIS goes on to say that: “The non-RRR portions of this commercial MSW would be collected via licensed commercial haulers for transport to municipally owned waste disposal facilities within the OCRRA service area ... The commercial MSW would be transported first to the WTE Facility, capacity permitting, to maximize

energy recovery. Overflow amounts would be sent to the RCR Transfer Station, which could receive up to 800 tons per day.”

According to **Table 3.8-5 Metals, drums and cylinders, E-waste, batteries, scrap wood, office supplies, plastic, foam** are all designated for recycling. However, the ability to recycle plastics and foam—especially when contaminated—is limited. The Onondaga County Resource Recovery Agency currently accepts a limited selection of solid plastic items for recycling and does not accept foam or film plastics (see current guidelines at [https://ocrra.org/wp-content/uploads/2024/03/Recycling\\_101\\_Web.pdf](https://ocrra.org/wp-content/uploads/2024/03/Recycling_101_Web.pdf))

The DEIS needs to define more fully what is in the non-recyclable commercial waste. This is a critical question because a large portion of the commercial SW is to be burned at OCRRA’s WTE plant. The semiconductor industry is highly reliant on PFTE, PFA and other fluoropolymers.<sup>83</sup> Fluorinated materials such as PFTE (Teflon) and PFA will not fully break down when burned, leading to emission of hazardous products of incomplete combustion, as well as hydrofluoric acid (HF), an extremely corrosive and toxic substance.

To mitigate air pollution impacts, Micron should segregate all waste materials made with fluoropolymers and not allow them to be incinerated. It would be best to find a way to recycle this material.

### **Wastewater sludge**

The DEIS in **Table 3.8-5 Industrial and Commercial Materials for Micron RRR Program** shows that “Non-hazardous sludge from on-site wastewater treatment” will be disposed of by “Send to [a] beneficial use vendor or recycle.”

What substances are anticipated to be in this sludge? Wastewater from the semiconductor manufacturing process is likely to be contaminated with a wide variety of substances, including: heavy metals, fluorides, PFAS, resins, microplastics, and polycyclic aromatic hydrocarbons.

No explanation is given as to how this sludge could be beneficially re-used or recycled. What is the feasibility of actually re-using this sludge? Where would it go? What are the environmental consequences? Will it be tested for hazardous substances to determine whether or not it should be classified as hazardous waste? If PFAS compounds are present, how will the sludge be managed so that it does not contaminate soils, surface water, plants, wildlife and groundwater with PFAS?

Appendix K-12 provides an example recycling program from the Micron facility in Boise, Idaho. That does not describe or even list a sludge re-use/recycling program.

What quantity of sludge is estimated to be generated? How much water will it contain? The environmental impacts of sludge disposal or beneficial use depend greatly on the quantity of sludge generated.

### **Hazardous Waste**

It is reported in **Table 3.8-6** that the Micron facility would initially generate 18,300 ton/yr of hazardous waste (Fab 1 in operation), ranging up to 50,300 ton/year with four fabs in operation. The sentence at the

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<sup>83</sup> See Feldman, 2023.

bottom of p. 2-236 states that “As shown in Table 3.8-7, hazardous waste would consist mainly of acidic and solvent waste volumes.” Table 3.8-7 shows volumes of unspecified “acidic waste” and unspecified “solvent waste” generated per fab. To convert these volumes to tonnages requires the densities of the waste. Assuming a density of water (1.00 g/ml) for the acidic waste and a density of 0.785 g/ml, which is representative of acetone and isopropyl alcohol, for the solvent waste, the total amount of acidic and solvent waste generated is approximately 8,750 ton per year per fab. This accounts for less than half of the 18,300 ton/yr total waste estimated per fab in **Table 3.8-6**.

**Table 3.8-8** provides a bit more detail about types of waste generated, but no quantities or specific identities are reported. The types and quantities of hazardous waste should be specified. What specific solvents are in the solvent waste? What acids are in the acidic waste? What chemical wastes account for the missing 9,500 ton/year of hazardous wastes estimated for each fab? Hazardous wastes, by their nature, pose a threat to the health and safety of workers and the surrounding community. Unintentional releases of chemical wastes can have devastating effects on the environment as well. For example, the derailment of train cars carrying vinyl chloride, phosgene, and other chemicals in Palestine, Ohio on February 3, 2023, forced the evacuation of thousands of residents and contaminated air, water and soils.

On p.3-239 the DEIS says: Micron plans to explore the distillation of isopropyl alcohol and ammonia solutions to reduce waste and to increase potential for valuable reuse off-site. Other material streams such as bulk solvent, drummed solvent, and contaminated debris would be reused or recovered through fuel blending or energy recovery at approved permitted cement kilns that allow kilns to run on waste-derived fuel. Certain waste streams such as lab waste, cylinders, expired materials, glues, resins, a subset of solvents, and certain acids would likely need to be incinerated at permitted off-site disposal facilities in other states.

Micron is to be commended for maximizing the reuse and recycling of IPA, ammonia. Greater detail about the quantities of the various waste streams slated to be incinerated by Veolia is essential to assess potential off-site impacts.

## **Air pollution**

### *NAAQS and Hazardous Air Pollutants*

The DEIS asserts that air pollution emissions from the construction and the operation of the Micron facility will not violate the National Ambient Air Quality Standards (NAAQS) for the study area. However, most of the monitoring data for criteria air pollutants (those with established NAAQS) on which this assessment relies comes from monitors in Rochester, NY, more than 70 miles from the project site. Only ozone and small diameter particulate matter (PM<sub>2.5</sub>) are measured in the Syracuse area. Conditions in Rochester may be expected to be similar, but Micron should at least be required to demonstrate – with actual local monitoring data – that they are before relying on these figures to demonstrate that the facility will not have any significant environmental impacts.

In addition, in making this assessment, the DEIS does not allow for or consider the impacts of any exceedances, upsets, or violations in assessing the environmental impacts of air emissions. No equipment works perfectly. Again, based on its experience in chip manufacturing, Micron should have some sense of how often its facilities encounter upsets, exceedances, or unavoidable permit violations that may result in

excess air emissions. If Micron doesn't have that data, it could rely on industry-wide statistics. For example, the Environmental Working Group found that, as of October 25, 2024, 10% of active semiconductor manufacturing facilities had violated federal environmental laws and regulations in the last 10 years and 27% of the facilities with individual discharge permits had violated those permits.<sup>84</sup> Finally, assuming that the DEIS NAAQS compliance analysis is correct, modeled levels of both NO<sub>x</sub> and PM<sub>2.5</sub> are very close to NAAQS limits. (see Table 3.6-10 NAAQS Results p. 3-168). Modeled results for the hazardous pollutants HF, NF<sub>3</sub>, and total fluorides, shown in Table 3.6-11) are very close to annual guideline concentrations (AGC) established in NYSDEC Division of Air Resources guidance DAR-1.<sup>85</sup> Given the uncertainty inherent in modeling data, and the lack of local background monitoring data, Micron should be required to install air quality monitors for NAAQS pollutants and selected hazardous air pollutants (including HF, NF<sub>3</sub>, and total fluorides) in the airshed directly affected by the Micron facility. The data from those monitors could be used to both check NAAQS compliance under regular operating conditions and to identify the environmental impacts of exceedances, upsets, or other unavoidable violations of air emission limits. Micron can then modify its operations or improve emission controls if the localized air monitoring shows exceedance.

### **Incineration of perfluorinated compounds (PFCs) and related gases**

In the section on Greenhouse Gas emissions, the DEIS notes that “Semiconductor manufacturers use a variety of high GWP [global warming potential] gases to create circuitry patterns on silicon wafers along with chillers for certain process tools to prevent overheating. Examples of widely used high GWP fluorinated compounds include PFCs (e.g., CF<sub>4</sub>, C<sub>2</sub>F<sub>6</sub>, C<sub>3</sub>F<sub>8</sub>, and c-C<sub>4</sub>F<sub>8</sub>), HFCs (CHF<sub>3</sub>, CH<sub>3</sub>F and CH<sub>2</sub>F<sub>2</sub>), NF<sub>3</sub>, and SF<sub>6</sub>. Semiconductor manufacturing processes also use fluorinated heat transfer fluids and N<sub>2</sub>O.” (DEIS, p.3-188)

Micron plans to incinerate its process gases: “GHGs from the Proposed Project would be emitted as a result of using fluorinated GHGs, N<sub>2</sub>O, CH<sub>4</sub>, and CO<sub>2</sub> as raw materials in manufacturing processes, from oxidation of organic compounds in thermal oxidation systems and RCTOs, from the combustion of natural gas and diesel, and from leaks of HTF [Heat Transfer Fluid].” “Thermal oxidation systems and RCTOs would combust natural gas, and byproducts of combustion would exhaust alongside other unreacted process GHG emissions.” (DEIS, p.3-188)

The problem with incineration is two-fold. First, it is not 100% effective; some compounds are only reduced by about 60%. According to the Environmental Assessment for the Micron fab in Boise, ID:<sup>86</sup> “Micron Boise currently estimates that its POU abatement systems achieve DRE factors between 60 and 98 percent based on the individual chemical and the ability of the POU abatement system to control each species of process gas.” Thus, a significant fraction of some gases escape into the atmosphere despite

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<sup>84</sup>Environmental Working Group. 2024. “What the Building CHIPS America Act Could Mean for Public Health and the Environment.” <https://www.ewg.org/news-insights/news/2024/10/what-building-chips-america-act-could-mean-public-health-and-environment>.

<sup>85</sup> New York State Dept. of Environmental Conservation. 2025. Division of Air Resources guidance DAR-1: “Guidelines for the Evaluation and Control of Ambient Air Contaminants.” Under 6 NYCRR Part 212.

<sup>86</sup> NIST, 2024. Final programmatic environmental assessment.

passing through thermal oxidation and wet scrubbing. This means the DEIS estimate of GHG emissions from oxidation of these wastes is much too low.

The other problem is that incineration produces toxic products of incomplete combustion, and hydrogen fluoride (HF), which is highly toxic and highly corrosive. This is discussed at length by Weitz et al (2024). The authors conclude that “Few studies have been conducted at full-scale operating facilities, and none to date have attempted to characterize possible fluorinated organic products of incomplete combustion (PICs). Further, the ability of existing air pollution control (APC) systems, designed primarily for particulate and acid gas control, to reduce PFAS air emissions has not been determined.”

They recommend “Further research is needed to examine the formation and measurement of PICs in full-scale treatment facilities.”

This is why the Department of Defense moved away from incinerating PFAS firefighting foam. The PICs as they are called are not regulated. They are not even monitored. So, we have the situation where toxic gases of unknown composition are being emitted into our community. What are the health effects?

The emission of products of incomplete combustion is completely overlooked in the DEIS. These hazardous chemicals are not being monitored, and are not regulated under the Clean Air Act or through NYS regulations. These air pollutants threaten the health of people and possibly wildlife who are exposed to them. The EIS needs to be revised to assess the danger these compounds pose.

Mitigation of these health risks can be accomplished in one of two ways:

- 1) Micron can replace these fluorinated gases with nontoxic degradable compounds; or
- 2) Micron can use an alternative technology to capture such gases and destroy them using a technology like wet air oxidation. Such technologies do not produce TICs, do not consume vast amounts of natural gas, and are generally less expensive to operate.

## **HUMAN HEALTH AND SAFETY**

### **Occupational Health Safety**

While the DEIS for Micron’s proposed Clay, NY facility presents encouraging commitments to environmental stewardship and worker safety, it falls short in specificity, transparency, and accountability required to meaningfully assess and mitigate occupational health and safety risks, especially regarding hazardous materials and per- and polyfluoroalkyl substances – known as PFAS-management. Across multiple categories, Micron outlines high-level goals—such as achieving near-zero hazardous waste to landfill by 2030, conducting internal chemical hazard evaluations, and implementing continuous workplace monitoring—but provides limited detail on how these goals will be operationalized, measured, or shared with the public.

Most critically, the DEIS does not disclose a full list of chemicals that will be used at the facility, nor does it include job-specific exposure assessments or risk matrices. Key safety documents, such as hazard procedures and waste contingency plans, are referenced but remain inaccessible or incomplete. Public

comments submitted during the SEQRA process—including those from NYSDEC—raised pointed concerns about chemical use, PFAS, waste management, and exposure risks. Many of these concerns remain unanswered rendering the DEIS inadequate in its current form. For a facility of this scale and complexity, the lack of disclosure raises serious concerns. To build public trust, meet the requirements of SEQRA (and NEPA), and uphold its stated commitments, Micron must provide transparent, facility-specific data, share internal evaluations and monitoring results, and ensure that hazardous material management strategies are robust, equitable, and publicly accountable.

## **Key Concerns Regarding Micron’s DEIS**

### **1. PFAS Management**

While the DEIS includes more information on PFAS than some environmental reviews, it falls short of offering a comprehensive PFAS management strategy. It acknowledges that some waste streams may contain PFAS including process-related wastewater (p. 3-239), that Micron will segregate PFAS-containing waste streams (p. 3-241), and that the company is evaluating emerging technologies capable of removing PFAS at parts-per-trillion levels (p. 3-241). It also includes Micron’s stated intent to select wastewater treatment options that “minimize generation of PFAS-containing waste” (p. 3-241) and the company’s commitment to collaborating with industry groups and regulators to improve PFAS detection and quantification (p. 3-240). However, it’s unclear how Micron will define, identify, or classify PFAS within its own internal policies. In addition, the need to evaluate emerging technology illustrates a current lack of comparable PFAS removal options.

#### *Gaps in Risk Management and Public Disclosure*

In parts of the DEIS, PFAS are acknowledged as emerging contaminants of concern (p. 3-83). Yet in other sections—such as the Phase I Environmental Site Assessments (ESAs)—the third-party consultants hired by Micron classify PFAS as “non-scope” issues (Appendix K, v1, p.20 of PDF), citing their current lack of designation as hazardous substances under federal law.<sup>87</sup> This contradiction raises a critical question that the DEIS fails to answer: will Micron include PFAS in its hazardous waste procedures? While the DEIS references plans to develop various hazardous waste management strategies, it does not specify which chemicals these will address.

The DEIS also acknowledges that PFAS used in semiconductor manufacturing may range widely in concentration - from less than 0.1% to 100% by weight - “depending on the definition applied—with the Organization for Economic Co-operation and Development (OECD) definition encompassing more than 10,000 substances” (p. 3-240). This highlights a contradiction: Micron recognizes the scope of the threat, yet stops short of making concrete, enforceable commitments to address it.

#### *Offsite Disposal and Destruction Technologies*

The DEIS provides no commitment to manage PFAS compounds identified as hazardous by emerging science and NYSDEC but not yet assigned occupational exposure limits (OELs) or other federal

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<sup>87</sup> Despite the current lack of federal designation of PFAS as a hazardous substance, both the EPA and DEC have recognized the potential health and safety impacts of PFAS. Therefore, the use, handling, and discharge of PFAS is within the scope of review under SEQRA and NEPA.

government regulation limits. Nor does it commit to disclosing a full inventory of PFAS used on-site, even though such disclosure would significantly improve public health tracking and environmental monitoring. Without knowing which PFAS are present, it becomes substantially more difficult for regulators and scientists to detect and monitor them in wastewater. Additionally, the DEIS is vague about how PFAS waste sent offsite—whether to incineration or landfills—will be handled, offering no assurance that destruction technologies will be used or that environmental justice impacts will be considered (p. 3-241). These omissions are unacceptable given PFAS’s well-documented health risks, extreme environmental persistence, and ongoing problems with PFAS exposure that NYSDEC is working to address.

## **2. Occupational Health**

### *Absence of Job-Level Detail and Chemical Risk Transparency*

The DEIS includes Micron’s commitment to Global Environmental Health and Safety (EHS) programs and worker protection, but it fails to provide the operational detail needed to evaluate occupational safety at scale. Approximately 9,000 permanent on-site operational jobs are projected for the Micron campus at full buildout. The DEIS only offers broad categorizations of these roles (e.g., manufacturing, IT, security, procurement, etc.) (pp 3-488- 3-489), without breakdown of tasks by job category, associated exposures, or risk levels. In both the main DEIS and Appendix L, chemical-specific hazards are not tied to department, process stage or job title. Instead, the DEIS defers to general OSHA standards and vaguely references internally developed matrices (Appendix L, p. 8)—without examples, criteria, or reporting mechanisms.

### *Illness Rates*

While the DEIS discusses injury rates, it omits illness data (Appendix K, Vol. 2, p. 447), a major gap given that many occupational exposures, particularly to toxic chemicals, manifest as chronic illnesses rather than acute injuries. This omission limits the ability to assess long-term health risks. While injury statistics are discussed, the DEIS does not include information about illness rates (Appendix K, Vol. 2, p. 447)—chronic, chemical-related or otherwise—especially in the semiconductor sector, where long-term chemical exposures are a known concern. Micron’s occupational health clinic should not only provide treatment, but also collect and publicly share de-identified illness data in a format compatible with public health tracking.

### *Industrial Hygiene Monitoring*

Micron pledges to apply the most protective occupational exposure limits (OELs) across the facility (p. 3-258) and to revise standards within 90 days of new, more protective thresholds (p. 3-259). A faster revision time would be preferable. In addition, there is no commitment to public reporting—at minimum—summary data on its exposure sampling results (and exposures against OELs), worker health monitoring trends (with patient identities removed), or any corrective actions taken. These reports should be shared regularly with NYSDOH and made accessible to the public.

### *Reproductive and Developmental Hazards*

The DEIS makes no reference to the potential risk that microchip manufacturing poses to reproductive and developmental health. PFAS are persistent, toxic, bioaccumulative, and ubiquitous. Well-studied PFAS have been linked to cancer, immunotoxicity, reproductive and developmental harm, and other serious health effects at extremely low exposure levels. There are several hazards used in the chip manufacturing process that have been shown to negatively impact reproductive health. Indeed, among the 460 most commonly used chemicals in electronics manufacturing 115 are reproductive toxins.<sup>88</sup> In a study funded by the Semiconductor Industry Association 30 years ago: researchers from UC Berkeley and UC Davis found significantly more miscarriages in women working in fabrication compared to office workers, even though fab workers were exposed to chemicals that were a tiny fraction of their OSHA Permissible Exposure Limits (PELs).<sup>89</sup> Worker exposure to neurotoxins can also lead to birth defects, including the birth of a child whose brain fails to develop. Micron must make clear in the DEIS how it will implement exposure limits to mitigate reproductive harm to workers.

### *Safety Committees and Fear of Retaliation*

The DEIS mentions that Micron will establish Worker Safety Committees (WSCs) to promote hazard identification and resolution (3-256). However, it provides no detail on how these committees will be structured to protect worker voices. Key questions remain: Will employees have the right to raise concerns anonymously? Will committee participation be voluntary and protected from retaliation? Will committee proceedings be recorded or summarized for public or third-party review?

Too many communities have learned too late that internal EHS programs, however well-intentioned, can fail to catch or correct dangerous trends when there is inadequate transparency or worker empowerment. Micron should clarify how it will ensure these WSCs are structured to ensure worker empowerment, accountability, and independence from managerial suppression.

### *Construction vs. Operations: Asymmetry in Standards*

Appendix L provides over 100 pages of detailed EHS requirements for construction contractors—including risk controls, compliance inspections, and method statements with job hazard analyses (Appendix L, pp. 10-115). However, there is no equivalent standard or plan presented for operational workers, who will face long-term exposure to hazardous chemicals and process equipment.

Many of the same protocols - critical risk checklists, PPE documentation, emergency response procedures, pre-task planning - should apply during both construction and operations. Although the DEIS mentions these elements for operations (pp.3-255 – 3-261), it does not provide an operational counterpart to the construction EHS performance standard. The DEIS should contain these procedures to provide sufficient detail and answer questions such as: Will EHS metrics for operational staff be tracked and reported, as is for contractors? Will there be a reward and recognition program for EHS participation by

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<sup>88</sup> “California Accidental Release Prevention Program,” CalEPA. N.d., <https://calepa.ca.gov/california-accidental-release-prevention/california-accidental-release-prevention-program-resources/>.

<sup>89</sup> Schenker *et al.* 1992. Epidemiologic Study of Reproductive and Other Health Effects among Workers Employed in the Manufacture of Semiconductors. Final Report to the Semiconductor Industry Association, December.

operational employees? These are foundational elements of a mature safety culture—and their absence from the DEIS is a significant omission.

In addition, the DEIS provides detailed EHS standards for construction contractors but fails to differentiate or commit to equivalent standards for temporary or third-party contract workers during operations.

#### *Risk Management Plans and Community Access*

Micron’s plan to develop a Risk Management Plan (RMP) for eight regulated chemicals is a positive step (p. 3-243). The company’s pledge to share the RMP with local first responders and the public is particularly encouraging. However, the DEIS does not explain how this information will be made accessible. Will the RMP be published online? Will hard copies be available through local agencies? Will updates be automatically shared or only available upon request?

It is also unclear whether PFAS or other emerging contaminants will be included in the RMP where applicable. Moreover, Micron has stated that it uses an internal chemical approval process to flag and control hazards, even those not currently regulated (Appendix K, Vol 2, p. 395), and refers to internal banned and restricted chemical lists (p. 3-258) as examples of best management practices. Consistent with a precautionary approach, Micron’s RMP should include any chemicals it internally identifies as hazardous, —whether formally regulated or not – and disclose these classifications publicly.

#### *ISO 45001*

Micron’s ISO 45001 certification is cited repeatedly as proof of strong health and safety practices (ex: 3-256). While ISO 45001 is a widely respected framework, the certification standard is not publicly available without purchase (\$222 USD or 177 CHF). This cost barrier prevents workers, community members, and researchers from understanding the commitments behind the certification. If Micron wishes to rely on ISO 45001 to bolster public confidence, it should provide clear summaries of what the certification requires and how it is being implemented on-site.

#### *Impact on Vulnerable Workers*

The DEIS makes no reference to vulnerable worker populations—including young workers, pregnant workers, contractors, limited English proficiency workers, or those engaged in repetitive or isolated tasks. Nor does it address the potential for disparities in risk exposure based on job classification, shift assignment, or subcontractor status. This is a significant omission that must be remedied.

### **3. Hazardous Materials**

#### *Missing Implementation Plans, Documentation Failures and Public Access Barriers*

The DEIS references a range of ambitious goals—such as achieving “near-zero hazardous waste-to-landfill” by 2030—but provides no implementation plan, timeline, or metrics for measuring progress. While the document mentions internal systems and procedures (e.g., chemical approval processes, hazardous waste reduction plans, contingency plans), many of these links are inaccessible, or behind password-protected portals in the appendices. Examples of hazardous waste procedure and

universal waste procedure are not provided in Appendix K except through links that require special logins (Appendix K, Vol. 2, p. 454). Other links, such as additional job hazard analysis information (Appendix K, Vol. 2, p. 452) lead to non-existent webpages. This lack of disclosure hampers the public's ability to comment meaningfully on Appendix K of the DEIS. These links should be fixed and the comment period should be extended thereafter.

The DEIS provides that several critical plans required by NYSDEC regulation, including the "Hazardous Waste Reduction Plan," "Hazardous Waste Contingency Plan" and "Hazardous Waste Procedure," will not be created until 6 months prior to the start of operations (p. 3-238). There is no commitment to make these plans available to the public. As a result, the public is left to guess how Micron defines "near-zero," how hazardous waste volumes will be tracked, or whether PFAS-containing waste streams will be included or excluded from these commitments. This makes meaningful comment on this aspect of the DEIS and the NYSDEC's ability to make necessary SEQRA Findings impossible.

Moreover, if Micron's waste reduction strategy relies on the offsite shipment of hazardous materials to contractors like Veolia (p. 3-237), the plan does not reduce hazardous waste—it simply displaces it, often to communities with less political and economic power. Given Veolia's documented record of environmental violations and the class action lawsuit raised against it for the Flint water crisis, community concerns about environmental justice impacts are entirely justified. In addition, if contractors plan to incinerate the hazardous materials, **incineration raises serious health risks, as incineration of hazardous materials can result in toxic air emissions and PFAS-laden ash.**<sup>90</sup> Waste-to-incinerator is not an acceptable substitute for meaningful landfill reduction. Once again, the lack of information in the DEIS makes it impossible to comment meaningfully on the environmental justice aspects of the waste management strategy.

#### *Undefined Chemical Approval and Control Processes*

The DEIS does not disclose details of Micron's internal programming for managing hazardous and restricted substances. Micron's Sustainability Report 2024 includes a page on hazardous and restricted substances (Appendix K, Vol 2, p. 395) which references a "rigorous review and approval process" for chemicals used at Micron facilities, but it fails to define the process, disclosure decision criteria, or identify any of the substances under review. Although the report mentions that Micron tracks its "chemical use profile" to support reduction and elimination efforts, neither the profile nor the outcomes of any of the related activities are disclosed. Micron's internal review is described as helping to prevent use of banned chemicals and ensures safe handling, recycling, and disposal. But the DEIS provides no decision criteria, no structure for oversight, no examples of restricted substances, and no indication of how workers or regulators might verify compliance. Which chemicals have been reduced? What alternatives are being considered? What is their chemical use profile? While we celebrate Micron's goal, it cannot act as a substitute for an explanation in the DEIS of the strategies and processes to attain the goal.

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<sup>90</sup> Yoders, Jeff. 2025. "Veolia Settles With Michigan Over Flint Water Crisis for \$53M." *ENR Midwest*, February 24. <https://www.enr.com/articles/60332-veolia-settles-with-michigan-over-flint-water-crisis-for-53m>.

The Sustainability Report further states:

We have established a team of subject matter experts who identify emerging substances of concern and, to the extent feasible, work toward removing such chemicals and materials before they are restricted by customers or regulators. Being proactive in our regulatory monitoring, product compliance, validation and certification processes allows Micron to deliver innovative products while controlling restricted substances and conforming with applicable requirements. (Appendix K, Vol. 2, page 395)

In a regulatory landscape where science often outpaces policy, such internal hazard evaluation processes could play a critical role in protecting health and the environment. But without transparency, these efforts cannot serve as a basis for regulatory trust or community protection. If Micron has developed proactive mechanisms for identifying chemicals to restrict or eliminate, it must disclose this process in the DEIS - including criteria, oversight structures, and results.

#### *Failure to Address Public Comments*

These omissions are especially troubling given the extensive public concern around hazardous chemicals, as documented in the SEQRA comment period. NYSDEC and members of the public specifically requested chemical inventories, mitigation strategies, and clear commitments to avoid environmental harm. In many cases, the DEIS either did not respond or provided incomplete responses on the types and volumes of hazardous waste, processing chemicals, alternative substances, and regulatory oversight. For example:

- **NYSDEC Comment 23** asked for an “evaluation of processing methods and chemicals used in the manufacturing process to determine if alternative methods could reduce the generation of hazardous waste.” Micron’s response redirected to a previous comment about the types and handling of hazardous waste but failed to address the core issue – which chemicals are used in the manufacturing process and whether safer alternatives exist. (Appendix A-D, p. 67)
- **Comment 4 (Public Comment on Water Resources)** requested details on wastewater contents, treatment, and pretreatment systems. The request explicitly asked “chemicals must be identified [...] including hazardous materials, even if the weights and the volumes are not known.” The response deflected, referring to general water resource comments without ever naming the specific chemicals likely to be discharged into wastewater, or how they will be monitored and controlled? (Appendix A-D, p. 79)

These are not trivial oversights—they speak to a structural unwillingness to disclose basic information about the types, volumes, and risks of chemical hazards at one of the largest proposed semiconductor facilities in the United States. This lack of transparency erodes public trust and undermines the credibility and adequacy of the DEIS as a comprehensive environmental assessment.

#### **4. Monitoring and Reporting**

Throughout the DEIS, Micron outlines plans for continuous and periodic monitoring of hazardous substances, including toxic gases, radiation, and flammable chemicals. While this monitoring is essential,

the DEIS fails to address how job-specific exposures, particularly for operational workers, will be tracked, evaluated, or addressed. This omission represents a major blind spot in occupational health protections.

The DEIS also fails to disclose a comprehensive list of chemicals to be used, stored, or produced at the facility. Without this information, it is impossible to evaluate or comment upon exposure risks or establish adequate monitoring protocols. This lack of disclosure is especially concerning given the semiconductor industry's well-documented reliance on toxic chemicals and history of worker illness tied to long-term chemical exposures.

While there is considerable reference to monitoring plans, there are no provisions for how this data will be shared with regulators or the public. Without regular, disaggregated, facility-specific reporting—on emissions, chemical use, chemical hazards, exposure incidents, and health metrics—there is no way for local agencies, health professionals, or community organizations to track risks or intervene early in the event of a problem. If Micron intends to build trust, it must commit to sharing exposure monitoring data and health trends—de-identified to protect individuals but robust enough to support early intervention and scientific study.

## **Health and Safety Recommendations**

To meaningfully mitigate risks identified in the DEIS and address critical information gaps, we urge NYSDEC and other permitting agencies to incorporate the following recommendations as binding conditions in the final EIS and any project approvals:

### **1. Chemical Transparency and Hazard Disclosure**

- Require Micron to publicly disclose a comprehensive inventory of all chemicals used, stored, or produced at the facility—including those used in small quantities or considered proprietary.
- Mandate that the inventory include volumes (when available), hazard classifications, associated job functions or departments, storage methods, and waste treatment or disposal pathways.
- Require Micron to disclose internal chemical review processes, including criteria for eliminating “substances of concern” and examples of chemicals already phased out.

### **2. PFAS-Specific Protections**

- Require Micron to disclose all PFAS compounds used on-site.
- Mandate inclusion of PFAS and other emerging contaminants in plans for managing hazardous waste.
- Require Micron demonstrate destruction without toxic byproducts for disposal of PFAS waste offsite or onsite; require onsite treatment evaluations and adoption of destruction technologies where feasible.
- Set a “zero PFAS release” policy as the performance goal, rather than relying solely on limited federal thresholds.

- We also recommend Micron commit to managing all compounds of PFAS identified by scientific consensus as hazardous.

### **3. Job-Level Risk Assessments and Occupational Health Safeguards**

- Require public release of job-specific risk matrices and exposure data by job category and function.
- Mandate that Micron collect and report de-identified exposure monitoring results, illness data, and corrective actions taken.
- Require a detailed operations-phase EHS performance plan comparable to the construction-phase EHS performance standard in Appendix L.
- Require Micron to detail the structure and protection measures of Worker Safety Committees.

### **4. Monitoring and Reporting Requirements**

- Require facility-specific, disaggregated reporting on chemical use, emissions, worker exposures, and health monitoring results.
- Ensure all monitoring data and protocol as well as right-to-know policies for workers—including air, wastewater, worker exposure and illness results—are shared with workers, local agencies, including NYSDOH, and made accessible to the public on a regular basis. The DEIS lacks any worker-oriented or public-facing reporting portal to access monitoring data, incident summaries, or compliance records. There is also no mention of a right-to-know education or notification system for workers. Transparency and early warning are key to injury and exposure prevention. Right-to-know policies are core to chemical safety and should be operationalized through digital access to safety sheets, alerts, and risk data.

### **5. Public Access to Internal Safety Plans and Procedures**

- Require Micron to publish its Hazardous Waste Reduction Plan, Hazardous Waste Procedure, Waste Minimization Plan, and Risk Management Plan in full, available for public review with active links, no password barriers, and ensure ease of access to the publicly available information.
- Ensure that Micron’s Hazardous Waste Reduction Plan includes detailed steps of how they will implement their goal of reaching “near-zero hazardous waste-to-landfill by 2030”—including metrics, timelines, and scope of included materials.
- Make emergency response plans, prevention protocols, health and safety training materials and other chemical hazard-related designs available for public review, and ensure ease of access to the publicly available information.
- The DEIS mentions emergency response coordination but does not propose periodic simulations, joint drills with local responders, or a community hazard notification system in case of a release or spill.

- Require Micron publish the implementation details of its ISO 45001 and ISO 14001 certifications specific to the Clay facility, since the standard itself is not publicly available, and ensure ease of access to the publicly available information.
- Require Micron publish the implementation details of any SEMI standards used for the Clay facility that are not publicly available.

## **6. Address Unmet Public Comments and NYSDEC Concerns**

- Require full and formal responses to all substantive comments submitted by NYSDEC and the public during the SEQRA scoping period—including those requesting disclosure of hazardous waste types, wastewater contents, and chemical processing methods.
- Require a formal public response with complete follow-through on previously omitted details, explaining how each comment was addressed in the final EIS.

## **TRANSPORTATION AND TRAFFIC**

Micron must invest in and expand public transportation infrastructure to accommodate the anticipated population growth and ensure workers have reliable and affordable public transportation to the fab. This must include accessible transportation support safe, reliable, and low-emissions transportation, such as electric buses and trains, to and from their proposed factories, which is not currently accessible by public transportation—as well as service to other areas in the region which are inaccessible to impoverished populations. The projected socioeconomic benefits projected by Micron’s development will not be accessible to transit-dependent people if convenient, reliable, affordable, and safe transportation is not available.

At present, the DEIS does not show comprehensive plans to expand the limited public transportation infrastructure within Syracuse and the regional study area to meet increased demand. Nor does the draft provide sufficient details surrounding the listed plans to expand public bus routes. For instance, the DEIS states that there is only a “[p]otential introduction of a new [Bus Rapid Transit (BRT)] line in Onondaga County.” (Appendix Vol 1, p. 6-4). The people of Onondaga County deserve more than ‘potential’ plans. The EIS must detail comprehensive and clear plans for expanding BRT infrastructure, consistent with the priorities outlined by the Community Engagement Committee (CEC).

### **Public Transportation Infrastructure Analysis**

The DEIS notes: “The Central New York Regional Transit Authority (Centro) provides public transportation services throughout Onondaga County and the surrounding regions. Eight Centro bus routes operate daily within the transportation evaluation area and are regional rather than local, resulting in widely spaced and infrequent stops” (p. 3-293). Moreover, the DEIS does not document direct collaboration or agreements with Centro to support expanded routes, new services, or integrated scheduling. While Centro is mentioned, there is no evidence of joint planning, funding commitments, or timelines for implementation.

Transportation is also an economic and racial justice issue. There is currently no Centro route that people from Syracuse can use to get to the Micron site. The nearest accessible Centro route in Southside Syracuse is about four miles from Micron, making it nearly inaccessible for future workers without vehicles. Estimated one-way travel times using ride share services can exceed 1.5 hours. Transportation issues like these pose a barrier to employment for low-and moderate-income (LMI) city residents. The DEIS does not include a model of commute times for proposed BRT routes or a simulation of how long commutes from LMI neighborhoods (e.g., Southside Syracuse) would take by bus, BRT, or shuttle under any scenario. Transit time is a key determinant of job access and is used in both equity and economic development assessments. Without this modeling, there is no meaningful way to assess transit feasibility for low-income workers.

The CEC Priorities Document includes “Sustainable and Equitable Infrastructure Development” as a core priority, with the goal of “[c]reat[ing] a sustainable and inclusive transportation network that enhances connectivity, prioritizes safety, supports economic growth, and minimizes environmental impact, [while] moderniz[ing] and sustainably manag[ing] utilities and natural resources for resiliency and sustainability.”<sup>91</sup> The priorities document also states that when consulting with community groups about Micron’s impact on public transportation “diverse groups emphasize the need for improved public transportation to access jobs, education, and healthcare”<sup>92</sup> Community feedback cited in the document emphasized the importance of expanding reliable and sustainable public transportation to access jobs, education, and healthcare. Despite this, the DEIS and appendices offer few substantive details beyond limited bus route expansion.

### **Public Transportation Proposals**

Section D 3.1 of the DEIS reviews the 2050 long range transportation plan of the Syracuse Metropolitan Transportation Council (SMTC) from 2020, which was amended in 2022. Did the 2022 amendment utilize the latest Micron population and household projections that were developed by REMI Study and Micron’s consultant? It is unclear whether such projections were included when SMTC amended its plan to reflect progress on the interstate 81 viaduct project. (p. 190 of the PDF or p. D-11.)

Appendix D3.2 discusses Onondaga County’s Comprehensive Plan policy implications. The Plan, adopted in 2023, calls for a focus on transit-oriented development near identified centers and transit corridors. It also calls for enhancement of the bus rapid transit system to support the land use vision of the county. However, section 3.2.1 of the Plan states that the proposed Micron project would not directly advance some of the comprehensive plan’s goals relating to the development of this key employment center, and that the proposed project would not include improvements to public transit, such as expansion of the bus rapid transit services. The DEIS shifts responsibility to the county, offering no commitment that the Plan’s vision will be realized. The final EIS must include funded commitments and plans for transit services that will support, organize and service the growth which the Micron project will induce. Without such commitments, the environmental impact of the proposed project cannot be known. Will there be

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<sup>91</sup> “Harnessing Opportunity: Community Priorities for Central New York: Community Priorities Document,” P. 16, CNY CEC, June 2024, <https://www.cnycec.org/community-priorities-document>.

<sup>92</sup> “Community Priorities Document.” P. 43, CNY CEC, June 2024.

transit service available to the visitors and employees of the Micron campus? Will induced growth, both residential and commercial, be accounted for when expanding public transit?

Under the Growth Inducing Effects section, the DEIS states that “The Comprehensive Plan includes policies to foster transit-oriented development near the centers, such as enhancing the County’s BRT system. Under the Comprehensive Plan, municipalities in Onondaga County would be expected to conform to future discretionary land use and zoning actions to facilitate new housing and business development in appropriate locations with the fewest adverse effects (e.g., adverse effects on infrastructure capacity or farmland).” (p. 3-33)

The draft also notes that Micron will construct four bus stops on its campus. However, there is no detail provided about these stops (p. 2-13). The final EIS must detail what bus routes these stops will service to determine how this helps expand public transit accessibility for future Micron workers. Moreover, under Table 4.2-1, in a list of Bus Rapid Transit Routes to be created under Present and Reasonably Foreseeable Actions, the bus line distance from Micron is “Unknown” (p. 4-11). Is this because the distance has not been mapped? Or are the distances not currently planned? The final EIS must clarify whether this is due to incomplete planning or mapping omissions.

The draft is also missing an analysis of how the ‘potential’ expansion of Centro’s bus routes will adequately meet the increased population demands, particularly for Micron workers commuting to the campus. The final EIS must include a comprehensive assessment of Centro’s current bus routes including existing service issues and an analysis of ridership, including income assessments, to determine transit adequacy for LMI residents. The EIS should also include more expansive analysis of future public transportation options that can be created to meet the needs of current and future residents who rely on public transit and how these plans will ensure future Micron workers have affordable, reliable, and sustainable access to public transportation.

## **Public Transportation Recommendations**

### ***Invest in public transportation infrastructure to ensure Micron’s facility is accessible to all CNY residents***

For Micron to make an effective commitment to equitable recruitment and hiring, Micron should invest in expanding access to public transportation. Micron can work with Centro to create practical bus routes to the site in LMI neighborhoods. Rapid transit service from designated places like the transit hub in downtown Syracuse can also be an option. There are clearly alternatives that should be considered rather than just building out the full amount of parking spaces Micron is planning. These alternatives would partially decrease the footprint of the development and lower vehicle emissions. Importantly, the DEIS does not mention how public transportation service schedules will be adjusted to accommodate non-standard work shifts. Micron’s fab will need to run 24/7, including night shifts, yet the DEIS does not assess whether existing or planned public transit routes will serve workers outside of peak commuting hours.

### ***Transportation Plans Need to Align with County Plans***

The EIS should make clear how plans for roads, buses, and other forms of transportation associated with Micron will support the Onondaga County Comprehensive Plan or “PlanON” for community development recommendations for future development. All regional development projects should be transit-oriented (see Greening USA “12 Traits for Sustainable Communities”,<sup>93</sup> and CNU New Urbanism Charter<sup>94</sup>). The County can adopt “Eco Friendly” planning standards including sustainable public transportation as cited in the CEC Priorities Document.

### ***Fund Syracuse Public Transit***

Micron could commit to funding a robust BRT route network that services the entire City of Syracuse as well as Clay and Cicero to support reduced greenhouse gas emissions from the region, reduce traffic congestion, and increase access to public transportation for all.

### ***Fund Free Shuttle to Micron Campus***

Micron could create a free or heavily subsidized shuttle covering several highly trafficked stops to support local communities accessing the Micron campus. This may also reduce traffic congestion.

### ***Assess Impacts of New Highway Interchanges***

The Micron FEIS should include assessment of community and environmental impacts of traffic within a 10-mile wide corridor around each new proposed highway interchange.

## **SOCIOECONOMIC CONDITIONS**

Micron’s proposed Project is slated to receive upwards of \$20B in public subsidies and tax credits from federal, state, and local governments. With this historic investment, the CNY community has been promised thousands of good jobs. However, Micron has made few concrete or enforceable commitments surrounding the permanent manufacturing jobs that define what constitutes a “good job” or how equitable access for these jobs will be ensured for current local residents, especially Syracusans.

This substantial public investment must result in real, quality jobs for members of the CNY community, especially those who have been historically left out of economic opportunity. A “good job” must guarantee family-sustaining wages and comprehensive benefits, safe working conditions, equitable hiring and employment practices, and access to an inclusive workforce pipeline and training opportunities. To meet this standard, Micron must provide specific details on its hiring process, compensation structures, working conditions, and training programs - and must make those commitments enforceable.

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<sup>93</sup> “12 Traits of Sustainable Communities,” Greening USA, N.d.  
<https://greeningusa.org/2023/05/02/12-traits-of-sustainable-communities/#:~:text=Trait%20%20%E2%80%93%20Water%20Related%20Infrastructure,Engagement%20and%20participation%20by%20citizens.>

<sup>94</sup>Congress for New Urbanism (CNU). 2024. “The Charter of the New Urbanism.” Summer.  
[https://www.cnu.org/who-we-are/charter-new-urbanism.](https://www.cnu.org/who-we-are/charter-new-urbanism)

These issues are relevant considerations under SEQRA. The DEIS itself underscores the importance with which socioeconomic impacts must be weighed, noting that “ Under SEQRA, the protection and enhancement of the environment should be given appropriate weight with social and economic considerations, and the factors should be considered together in reaching decisions on proposed activities; environmental factors are not the sole consideration in decision-making (6 NYCRR § 617.1(d)).” (p. 3-465).

### **Worker Pay**

The DEIS notes: “At full operational capacity in 2045 the Proposed Project would generate more than 9,000 permanent on-site operational jobs and spur the creation of approximately 40,000 additional jobs in the regional economy and throughout New York State, including vendor, supply chain, construction, and community jobs. Upon completion, the Proposed Project would be the largest domestic producer of DRAM chips, 9,000 high-paying jobs by 2045” (p. 0-1). Of these 9,005 jobs, Micron estimates that 90% will be in manufacturing, with the remaining 10% in supportive services, which include IT, security, quality, procurement, supply chain, smart manufacturing technology, finance, HR, and legal services (p. 3-488). Of the 90% of manufacturing roles, 10% will be in leadership roles (supervisors, managers, directors), 44% will be engineering and professional roles (e.g., equipment and process engineers), and 36% will be equipment and process technicians. However, only 669 of the jobs created within the first three years will be eligible for workers without an advanced degree (p. Q-49-50).<sup>95</sup>

Micron reports that employees at the Fab Complex are expected to earn an average of \$100,000 in total compensation (base salary plus cash bonuses)(p. 3-489). However, it is not clear how often cash bonuses are distributed, making the actual base salary difficult to assess. The DEIS also fails to clarify the pay disparities between higher paid employees (such as engineers) and lower-paid roles (such as operators).

According to Micron’s PILOT application, engineers and technicians are projected to earn \$94,800 and \$68,600 per year, respectively.<sup>96</sup> With 36 percent of operational workers serving as technicians, nearly half of Micron’s operational workers will not be receiving the \$100,000 salaries Micron has publicized. Furthermore, Micron exhibits one of the highest pay disparities among federal CHIPS Act recipients. In 2023, Micron CEO Sanjay Mehrotra received the highest compensation among all CHIPS recipient CEOs at \$25.3 million - rising to \$30 million as of 2024<sup>97</sup> - while half of Micron’s workers earned less than \$54,570 the same year.<sup>98</sup>

To ensure transparency and accountability, the EIS must disclose the full pay ranges associated with each position. Micron must provide clear, enforceable salary ranges for each classification, explicitly

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<sup>95</sup> “Onondaga County Industrial Development Agency Application for Financial Assistance.” Onondaga County Industrial Development Agency, July 14, 2023. <https://ongoved.com/wp-content/uploads/2023/03/OCIDA-Micron-Amended-and-Restated-Financial-Assistance-Ap-plication-6-10-2024-Executed-4886-7419-5655.1.pdf>.

<sup>96</sup> Ibid.

<sup>97</sup> “Highest-Paid CEOs.” AFL-CIO, 2025. <https://aflcio.org/paywatch/highest-paid-ceos>.

<sup>98</sup> Mills Rodrigo, Chris. 2024. *Leveraging the CHIPS Program to Create Good Jobs for All Semiconductor Workers*. Institute for Policy Studies, August 22. <https://ips-dc.org/report-leveraging-chips-program-to-create-good-jobs>.

differentiating base pay from bonuses to allow accurate assessment of true economic benefit and equity across job categories.

## **Hiring**

The DEIS outlines several construction partnerships and commitments Micron has made to ensure there is equitable and inclusive access to construction jobs including: their commitment to hire 1,500 veterans in the region over two decades via the Center for Military Recruitment Assessment and Veterans Employment with the use of the “Helmets to Hardhats program” (p. Q-53), signing onto the CHIPS Women in Construction Framework (p. Q-49), committing to work with local construction partners to establish a target percentage of construction workforce from disadvantaged populations (p. Q-49), and entering into a Project Labor Agreement with local building trades (p. Q-49).

However, while the DEIS outlines some inclusive hiring efforts for the construction phase, it provides few details and no enforceable commitments about Micron’s plans to hire workers from disadvantaged communities such as disadvantaged communities with documented high rates of poverty for permanent manufacturing jobs. The EIS must clearly outline how Micron intends to recruit, train, and hire marginalized and underrepresented workers for its permanent operations positions to fully assess socioeconomic effects.

The draft states: “Given the Micron Campus’ proximity to colleges and universities, the regional collaborations, and initiatives for training already in place, and with additional investments through the Green CHIPS Community Investment Framework (CIF) it is reasonable to assume that Micron could exceed the 60 to 70 percent local job recruitment rates experienced at Micron’s Boise, Idaho and Manassas, Virginia facilities. For the Proposed Project, this equates to over 6,300 permanent operational high-paying jobs secured by existing local and regional study area residents, and approximately 2,700 secured by workers who would be in-migrating to the region” (3-489).

While we are pleased to see that Micron has this local hire target for its recruitment, Micron must commit to this goal in an enforceable manner for permanent production facility jobs. Additionally, the draft notes that these 6,300 permanent operational workers will come from both the local and regional study area. However, it is unclear how many of the 6,300 locally sourced positions will come from the City of Syracuse versus the broader regional study area. This distinction is critical. Syracuse has the highest child poverty rate (46%) of any U.S. city and a high overall poverty rate of 29.6% (p. Q-18-19), significantly higher than nearby areas like Cicero and Clay. It is essential that Syracuse residents, who face the greatest economic needs, are prioritized for access to these quality jobs. We should not miss a golden opportunity to improve the lives of children from low-income families.

Micron must guarantee that a meaningful percentage of new hires come from marginalized local communities, particularly within the City of Syracuse. Micron must establish a workforce development process that targets census tracts with the highest concentration of poverty in the CNY region. In addition, Micron must commit to inclusive hiring policies that remove unnecessary barriers, such as GED requirements, English language proficiency requirements, and prohibit discrimination against workers impacted by the criminal legal system.

## Training

The DEIS notes that Micron’s programs, developed in partnerships with regional universities, will “expand equitable access to education, increase retention and prepare all students—especially students from underrepresented groups and rural areas—for productive and fulfilling engineering careers” (Q-53). However, it is not clear how this program will specifically target underrepresented populations or which groups are included in the definition of “underrepresented” and “rural”. The vagueness of this commitment means that its impact is impossible to assess. The EIS should provide details on this program, clarify the intended beneficiaries of this initiative, and provide details on outreach strategy and structural design to ensure it effectively expands access for underserved communities.

While this is a good start in ensuring equitable access to engineering jobs at Micron, the company must make enforceable commitments to equitable access to training programs for production workers entering lower-tract and non-engineer positions. This includes entry-level and mid-skill roles, which offer more accessible pathways into the workforce for individuals with fewer academic credentials, as well as on-the-job training opportunities for upward progression.

The draft notes that technicians, who will make up 36% of the manufacturing workforce, offer the greatest opportunity for an onramp for less qualified workers with the lowest certification barrier requirements: “The qualifications are an Associate of Arts or Science degree or completion of a Micron Apprenticeship Program, another approved certification, or a combination of certifications under development with Micron community college partners or equivalent training and experience.” (p. Q-50) The draft also states that Micron will provide “on-the-job training for the role’s function” (Q-50).

However, the DEIS fails to provide sufficient detail on either the Micron Apprenticeship Program or the nature of the on-the-job-training. The EIS should clarify the structure, content, and delivery of both training components. Specifically, it should explain how the apprenticeship program and on-the-job training differ, which workers will be eligible for each, and whether either program is offered in collaboration with labor unions, registered apprenticeship sponsors, or nonprofits organizations.

For the Micron Apprenticeship Program in particular, the EIS should detail which workers will be eligible or prioritized for enrollment, whether the program is registered with state or federal apprenticeship agencies, whether the program is delivered in partnership with community-based or labor organizations, and, whether the program will intentionally target underrepresented or marginalized workers and if so how the targeting is implemented.

In addition to workforce entry training, Micron should commit to ongoing professional development for its employees to ensure equitable access to promotion and advancement opportunities within a highly technical work environment. The DEIS does not currently outline any plans to continue upskilling or retaining of operations workers, an omission that must be addressed if Micron is to offer true long-term career pathways and inclusive economic mobility in a highly specialized sector.

## Work Conditions and Opportunities for Advancement

The DEIS does not outline plans to ensure workers will have access to internal advancement opportunities within Micron. Reporting from the Institute for Policy Studies indicates that Micron workers in Manassas Virginia have experienced barriers to promotion opportunities and wage growth. In particular, multiple workers at the Manassas location have cited that internal job postings were removed before employees had the opportunity to apply. Workers have also reported being expected to work additional unpaid hours, on top of twelve hour shifts, in order to be considered for advancement. Additionally, Micron workers have noted that they have earned minimal pay increases of a dollar or two over a period of several years.

These concerns are compounded by broader issues facing semiconductor workers. Low-wages, limited advancement opportunities, workplace safety issues, and demanding schedules are pervasive issues for semiconductor workers here in the U.S.<sup>99</sup> The DEIS notes that “Micron would operate five (5) shifts over a 24-hour day. Day and night shifts would be utilized to sustain 24-hour manufacturing activities, as well as a Monday-Friday day shift” (p. 2-15). To maintain continuous production, the draft further states that production workers will be scheduled 11.5 hour overlapping shifts (p.2-15). Although DEIS identifies demanding 11.5 hour overlapping shifts, it does not provide clarity on how Micron plans to mitigate fatigue and related safety risks. Micron must explicitly detail measures to address potential health and safety risks associated with prolonged shifts, including rest periods, shift rotation practices and comprehensive fatigue management protocols. Working long hours and mandatory overtime are known to increase injury rates and health impacts. One large cross-industry study from the U.S. found that overtime increases the risk of workplace injury, measured as the injury hazard rate, by 61%. At least 12 hours a day was associated with 37% increases and at least 60 hours per week to 23% increases.<sup>100</sup>

These demanding work schedules, combined with a lack of clarity around advancement and training, raise serious concerns about job quality and long-term retention. The EIS should directly address these issues by outlining how Micron plans to provide safe working conditions, fair compensation, and transparent, equitable pathways for internal promotion and professional development.

## Workforce Reporting Information Collection

To ensure that Micron achieves the goals of the CHIPS Incentives Program and Green CHIPS Act, the CHIPS Program Office (CPO) and Empire State Development (ESD) must actively monitor workforce metrics, milestones, and compliance with health and safety standards. Collecting key baseline data is essential to determine whether the Green CHIPS program is, in fact, truly delivering good manufacturing jobs accessible to all. At minimum, Micron should be required to report the following:

1. **The number and geographic location of U.S. jobs created or supported.** Given that many semiconductor roles can be performed remotely, it is important to assess whether jobs offer economic benefits in the communities where subsidies are targeted.

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<sup>99</sup> Mills Rodrigo. 2024.

<sup>100</sup> A. E. Dembe, et al. 2005. *The Impact of Overtime and Long Work Hours on Occupational Injuries and Illnesses: New Evidence from the United States*. 588–97. *Occupational & Environmental Medicine* 62, no. 9, September, <https://pubmed.ncbi.nlm.nih.gov/16109814/>.

2. **The minimum wages and benefits for each job title.** Relying on average compensation figures obscure pay disparities. For example, while the Semiconductor Industry Association cites \$170,000 as the average annual salary,<sup>101</sup> the U.S. Bureau of Labor Statistics reports that processing technicians earn a median hourly wage of \$21.49, with the lowest 10th percentile earning just \$15.92 per hour (or \$44,690 and \$33,120 annually, respectively).<sup>102</sup> Reporting minimum, not just average wages.<sup>103</sup>
3. **Recruitment, hiring, and training plans for marginalized and underrepresented workers in the manufacturing workforce.** Micron must describe how it will recruit workers who face barriers to employment, such as women, people of color, veterans, formerly incarcerated individuals, people who live in rural areas, residents of low-income census tracts, and workers transitioning from carbon-intensive industries.

CPO and ESD must monitor Micron to ensure these goals are achieved. According to The CHIPS & Science Act Section 105, the Government Accountability Office (GAO) requires the CPO, to the extent possible, to report on “aggregated workforce data, including data by race or ethnicity, sex, and job categories.”<sup>104</sup>

The most effective way to ensure compliance is to mandate regular, quarterly reporting from Micron. These reports should include, among other things, total U.S. Full Time Equivalent (FTE) work performed that quarter by job type and demographics; minimum wages and benefits paid, disaggregated by job title and demographics; information on each new hire; and descriptions of workforce development, apprenticeship, and training programs.<sup>105</sup>

In addition, Micron should be required to report on all applicable federal or state-mandated administrative and national policy requirements. The CHIPS Incentives Program NOFO and Green CHIPS requirements lists multiple administrative requirements, including compliance with prevailing wage laws under the Davis-Bacon Act and adherence to federal employment and labor laws such as the Civil Rights Act, Fair Labor Standards Act, Occupational Safety and Health Act, and the National Labor Relations Act.<sup>106</sup> Required documentation, such as firm level EEO-1 Component reports and OSHA 300 logs, should be included, along with disclosures of any violations and their overall compliance status.

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<sup>101</sup> Semiconductor Industry Association (SIA). 2022. “The US Semiconductor Industry Workforce.” Accessed August 22.

<https://www.semiconductors.org/wp-content/uploads/2022/02/The-US-Semiconductor-Industry-Workforce.pdf>.

<sup>102</sup> Bureau of Labor Statistics (BLS). 2022. “Occupational Employment and Wages.” May. <https://www.bls.gov/oes/current/oes519141.html>.

<sup>103</sup> Reporting minimums provides insight into what the lowest-paid workers are making, while average pay can be skewed by the highest earners – the Semiconductor Industry Association uses \$170,000 annual pay as the average for the industry. Semiconductor Industry Association (SIA). 2022.

<sup>104</sup> Department of Commerce. 2023. CHIPS & Science Act. Division A Section §105(a)(2)(D)(iii). Pg.27; NIST. “Notice of Funding Opportunity: Commercial Fabrication Facilities.”

<sup>105</sup> Jobs to Move America (JMA). 2020. “U.S. Employment Plan.” April 10. <https://jobstomoveamerica.org/resource/u-s-employment-plan-2/>.

<sup>106</sup> Excelsior Jobs Program Regulations (updated for Green CHIPS 3/28/23). March 28, 2023. <https://esd.ny.gov/sites/default/files/ExcelsiorRegs%20-2023-GC-updated-final-050123.pdf>.

Lastly, to complete the foundation of strong workforce development programs, CPO, NIST, and ESD should impose penalties for non-compliance or rescind any other benefits the recipient may have earned related to these commitments. The CHIPS Incentives Program NOFO provides clawback provisions for failure to achieve construction target dates, around technology sharing with foreign entities, and recipient expansion into prohibited foreign countries.<sup>107</sup> Similarly, the Green CHIPS Program requires recipients to meet its targeted lower-bound net new jobs number or the lower estimate of annual net new jobs they identified in their signed agreement with ESD.<sup>108</sup> Both programs require recipients to comply with all reporting requirements. We urge for the implementation of similar penalties for non-compliance with workforce-related contractual commitments.<sup>109</sup>

The federal and state CHIPS Acts represent a historic opportunity for workers and their communities to ensure that the hundreds of thousands of construction and operations jobs created by CHIPS funding opportunities are good jobs. CPO, NIST, and ESD should institute robust and transparent reporting with the appropriate compliance mechanisms to ensure accountability.

### **Economic Development & Growth Inducing Effects**

Economic inequality and segregation is prevalent in CNY, particularly in Syracuse. Black and Latinx individuals have significantly higher poverty rates relative to white individuals and these rates are higher in CNY. This is most keenly felt in the economic disparities between central Syracuse and areas outside of the city center like Clay. In Syracuse, 29% of the population is Black, compared to just 4.5% in Clay. Despite these realities, Micron makes no clear or enforceable commitments to alleviating poverty in Onondaga County.

The DEIS subsection, Economic Development, Labor, and Employment concludes that the impacts of operational activities on economic development, labor, and employment will not result in significant adverse effects (p. 3–490). However, given the massive scale of Micron’s project, it seems preposterous that Micron’s hiring will not impact labor costs or workforce availability for other businesses and manufacturers in the central New York area. The DEIS implies that surrounding employers will not see an

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<sup>107</sup> National Institute of Standards and Technology (NIST). 2023 “Notice of Funding Opportunity: Commercial Fabrication Facilities.

<sup>108</sup> Excelsior Jobs Program Regulations (updated for Green CHIPS 3/28/23). March 28, 2023.

<https://esd.ny.gov/sites/default/files/ExcelsiorRegs%20-2023-GC-updated-final-050123.pdf>.

<sup>109</sup> Micron has fallen well short of realizing their job creation commitments in the past. As part of its \$70 million grant from the State of Virginia to support the expansion of their manufacturing facility in Manassas City Virginia, Micron committed to making \$2.9 Billion in capital investments and increasing employment by 1,106 by 2027. While Micron has met overall payroll and capital investment goals, they have fallen well short of hiring commitments. As of fiscal year 2023, Micron has missed hiring targets by 73%. As of 2023, Micron had only created 150 new jobs at the Manassas plant compared to their goal of 553 by that year. Micron had been meeting their hiring commitments towards the beginning of the grant period in 2019 and 2020 but failed to meet requirements in subsequent years. In 2021, new jobs declined by 39. The company blamed the pandemic for the slowdown, but Micron only added 38 new jobs in 2022 and in 2023 new jobs again declined by 265. As of 2023, Micron had committed to 553 new jobs in Manassas but had only added 150, a shortfall of 73%. This decline coincided with a global repositioning by Micron which led to a 10% reduction in total workforce. It appears that Micron’s macro business considerations trumped the commitments they made to the State of Virginia related to hiring. Micron Technology Inc. 2019 - 2023. “FY19 - FY23 Annual Progress Report Semiconductor Manufacturing Grant Program: Micron 2018 Expansion Project.” (received via VFOIA request); Micron Semiconductor Manufacturing Performance Agreement Executed. 2018. (received via VFOIA request).

adverse impact in retaining or paying workers once Micron’s operations begin but provides no documentation to support this counter-intuitive claim. For example, have other employers been consulted to assess potential impact?

In its discussion of construction-phase labor shortages—which is expected to last 16 years—the DEIS claims that shortages of labor are expected to be limited and short-term (p. 3-485) but fails to provide adequate documentation about how this broad conclusion was reached. The EIS should include a detailed analysis explaining how this determination was made.

Labor shortages during both construction and operational phases are significant concerns that are not completely addressed in the DEIS. While it may be true that training programs will increase the labor supply and mitigate upward pressure on labor costs, the DEIS does not offer evidence to substantiate this and details supporting these claims are lacking. The DEIS should be amended to clearly detail all intentions and projections related to labor acquisitions, training, in-migration and impacts on existing employers. Absent this detail, the public cannot meaningfully evaluate the scope and credibility of the DEIS’s labor impact claim. The EIS should provide a clear, fair, unbiased, and detailed assessment of this impact.

The cumulative socioeconomic benefit from the project depends in large part on induced growth from worker spending in the regional economy. But those benefits are likely to diminish if Micron’s direct and indirect new jobs are skewed toward the low end of the industry wage scale, limiting workers’ disposable income to spend on locally serving businesses. This concern is especially relevant in a region where the top two industries are retail trade (21.8 %) followed by accommodation and food services (11.3%) (p. Q-38), sectors that consistently offer among the lowest wages. In Onondaga County, in particular, the DEIS notes: “approximately one-quarter of the resident labor force is employed in the retail trade sector” (p. Q-39).

Syracuse, the most populous city in Onondaga County,<sup>110</sup> has a poverty rate of 30.1%, nearly 20% higher than the national average,<sup>111</sup> and has the highest child poverty rate (48.4%) of all U.S. Cities (and overall poverty rate of 29.6%). With the project projected to create over 33,000 indirect jobs, many of these will likely be in the low-wage service sector. Within this low-wage sector, retail industry jobs pay the lowest, with most retail jobs earning less than the average private sector job. In real terms, retail wages have been in decline since the 1970s with current retail wages at just 72% of what they were in 1972. On top of low wages, retail workers rarely receive benefits or formal training.<sup>112</sup> Without properly accounting for the impact that Micron’s arrival will have on the creation of low-wage spinoff jobs, it is possible that Micron’s cumulative socioeconomic impacts will have negative impacts on the local and regional study area.

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<sup>110</sup> Data Commons. 2023. “Ranking by Population: All cities in Onondaga County.” [https://datacommons.org/ranking/Count\\_Person/City/geoId/36067](https://datacommons.org/ranking/Count_Person/City/geoId/36067).

<sup>111</sup> Misiaszek, Emma. 2023. “Syracuse ranks 2nd in economic disparity for Black residents, according to LendingTree study.” CNY Central, September 6. <https://cnycentral.com/news/local/syracuse-ranks-2nd-in-economic-disparity-for-black-residents-according-to-lendingtree-study>.

<sup>112</sup> Carré, Françoise, and Chris Tilly. 2017. “A Global Look at What Makes U.S. Retail Jobs so Bad.” Perspectives on Work: Retail Workers.

Additionally, knowing the earnings distribution among Micron’s expanded workforce would also help refine these plans. In other centers of high-tech employment, such as Silicon Valley, growth in high-wage tech jobs has been found to increase regional employment growth overall, but at the cost of inflating housing costs and eroding real wages for workers earning less, such as retail and hospitality workers.<sup>113</sup> Micron’s potential to widen inequality in metro Syracuse and Onondaga County and displace low-income residents must be explicitly addressed.

The DEIS’ subsection on growth inducing effects (Section 3.1 5.3.2) is unclear. Here, we see recognition that there will be adverse effects on such things as housing costs, housing availability, housing affordability, etc., but section after section, the DEIS claims that these effects will be short-term. The DEIS notes that as it relates to housing disruptions the “short-term” is asserted to be four years as the market adjusts. But still, all of this is conjecture. These sections seem to overstate the proposed or intended benefits, but understate the potential for adverse impacts.

In the mitigation measures (section 3.1 5.4 p 3–503) the claim is made that Micron does not control the housing market and cannot specifically mitigate such impacts, but Micron will “continue to work with agencies and stakeholders to identify specific actionable measures to avoid or minimize the potential for short term significant adverse effects” on the local housing market. The public needs more than ‘work with’” (p. 3-503). Additionally, one of the goals of Micron’s Community Investment Fund is to support affordable housing in the region.<sup>114</sup> The public needs assurances that the inevitable housing disruptions will be mitigated. The EIS should be clearer about what specific plans Micron has to work with agencies. We propose the following mitigation measure relating to growth--inducing impacts, all of which can be incorporated through a community negotiated and enforceable Community Benefits Agreement which is discussed in more detail below:

- To ensure proper community participation is involved, we recommend the creation of a citizens conservation type management and environmental mitigation council to oversee all actions relating to the environmental impacts of the fabs as well as the induced growth and mitigation of its effects.
- Creation of an independent planning team made up of professional, certified planners to oversee, review, and manage growth--related mitigation measures.
- Adequate funding for staffing of the planning team and the citizens’ council, as well as funding for incentives or subsidies needed to mitigate problems related to housing shortages, affordability, and avoidance of homelessness.

The intersection of household growth and GHG emissions is something that also deserves additional scrutiny and explanation in the EIS. This DEIS dismisses the GHG impacts of induced growth as minor compared to the fabs themselves. Perhaps this is true, but there is no assessment and no facts presented to substantiate this claim. But regardless of the relative magnitude of GHG emissions from each sector, the

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<sup>113</sup> Dee Gill, and William Yu. 2019. “Does a Rising Tide of High-Wage Tech Jobs Really Lift All Boats?,” *UCLA Anderson Review*, October 30. <https://anderson-review.ucla.edu/forecast-tech-jobs/> .

<sup>114</sup> ESD. 2022. “Memorandum of Understanding for Micron Community Investment Framework in Central New York.” October 27. <https://esd.ny.gov/sites/default/files/Executed-MOU-NY-CIF-with-Exhibit.pdf>.

GHG emissions from induced residential and commercial (or even supply chain industries) should be accounted for and reported in the EIS.

Overall, the Growth Inducing Effects section of the DEIS does not adequately explain how the growth induced impacts of the community will be met. It praises the anticipated benefits of fab development in abstract terms while minimizing the likely adverse impacts. It fails to establish how these challenges will be met without adequate preparation, investment, and citizen oversight, particularly through a negotiated community benefits agreement (CBA), which has been notably absent from this project so far.

The DEIS admits that the region has not updated municipal plans and is unprepared to manage induced growth, which will consequently lead to adverse impacts. How can the fab development be approved without the community being prepared to deal effectively and sustainably with the recognized external socioeconomic and environmental costs and risks? Page 3-33 states:

Although other counties and municipalities in the five-county study area have enacted comprehensive plans, there are few recent plans. The City of Syracuse Comprehensive Plan was enacted in 2012, the Oswego County Comprehensive Plan was enacted in 2008, and the Cortland County Consolidated Plan was enacted in 2002. Over time, other counties and municipalities could enact updated policies similar to the Onondaga County, Clay, and Cicero plans described above to include measures to mitigate adverse growth inducing effects from the Proposed Project, while harnessing smart growth principles, such as the goals outlined in the Onondaga County Comprehensive Plan, to realize positive benefits from induced growth in the region. In particular, future planning policies could direct development to appropriate locations with the fewest adverse effects to farmland. (p. 3-33)

That paragraph references principles set forth in the Onondaga County Comprehensive Plan, yet it offers only aspirational goals. Unless towns and cities adopt those principles into enforceable local law, these principles will have no binding impact. Moreover, even full adoption may not go far enough to mitigate the impacts which the fab developments, or induced growth, will create. Leaving induced growth, its impacts, and mitigation to “future planning policies” opens the floodgates for adverse impacts. This is unacceptable and untenable.

Approvals for the fab development must be contingent upon robust, binding mitigation commitments that ensure induced growth occurs in a way that addresses concerns including greenhouse gas emissions, costly infrastructure, traffic congestion, housing affordability, and homelessness. A binding CBA that details a mitigation plan with measurable and achievable objectives will go far in helping to offset the adverse impacts of the induced growth.

### **Community Investments**

As part of the Green CHIPS investment, Micron has committed to invest at least \$250 million, making up half of the \$500 million Community Investment Fund, over 20 years into “Workforce Development and Expansion, Education, Community Assets and Organizations, and Affordable Housing,” according to the

CIF Memorandum of Understanding (MOU).<sup>115</sup> While many of these commitments are promising, all of these commitments are made in “good faith” and are therefore not enforceable.<sup>116</sup> To ensure that Micron makes good on these promises, it is critical that these commitments be both enforceable, have public oversight, and be publicly reported. The DEIS fails to articulate enforceable commitments or measurable community outcomes. Micron must detail enforceable accountability measures, including milestones, public reporting mechanisms, and structured community oversight committees to ensure community investments deliver tangible, measurable benefits.

According to the MOU for Micron CIF,<sup>117</sup> the purpose of the MOU “is to memorialize discussions and understandings between the Parties for the CIF, which the Parties anticipate will be incorporated into an approved ‘Green CHIPS Community Plan’ upon formal adoption of the regulations governing the ESD Green CHIPS program.”<sup>118</sup> The “Green CHIPS Community Plan” is not currently publicly available and despite FOIL requests we have yet to receive any documentation of this executed plan. Notably, the DEIS makes no references to the “Green CHIPS Community Plan” despite several references to the Green CHIPS Investment Fund. Without this final executed Plan it is unclear to what specific goals Micron is going to be held to account, how Micron will meet these goals, and on what Micron will publicly report.<sup>119</sup>

We appreciate the CPO’s emphasis on building resilient local economies by requiring applicants to make community investments and identify areas within their regional economies that require investments to ultimately help strengthen the economy under the Commercial Fabrication Facilities Funding NOFO.<sup>120</sup>

We encourage Micron to commit to milestones, to publicly report on outcomes, to provide community benefits (such as affordable housing, public transportation, and local investments in secondary and post-secondary education), protect community health, develop renewable energy infrastructure, and provide workforce development opportunities for historically marginalized community members. Opportunities such as these can be provided and enforced through CBAs between impacted communities and CHIPS grantees. Like job creation commitments, community investment commitments whether included in a CBA or not, should be subject to monitoring and public reporting. Because they directly involve impacted communities in their negotiation and enforcement, we believe robust CBAs are the best way for companies to comply with 15 U.S. Code § 4652, which requires recipients of CHIPS and Science Act funding to invest in surrounding host communities.

As part of a CBA, Micron should establish a community monitoring committee that includes community members and worker representatives to monitor and hold Micron accountable. Public reporting should occur on a regular and recurring basis (to be determined) to confirm Micron’s compliance. Reporting can be done either by Micron, or by a third-party expert selected and managed by the community monitoring

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<sup>115</sup> ESD. 2022. “Memorandum of Understanding for Micron Community Investment Framework in Central New York.”

<sup>116</sup> Ibid.

<sup>117</sup> Ibid.

<sup>118</sup> Ibid.

<sup>119</sup> The MOU for the CIF states that, “Consistent with the Green CHIPS program regulations, the parties expect that progress regarding the commitments set forth in the Green CHIPS Community Plan will be subject to regular public reporting.” ESD. 2022. “Memorandum of Understanding for Micron Community Investment Framework in Central New York.”

<sup>120</sup> NIST. 2023. “Notice of Funding Opportunity: Commercial Fabrication Facilities.”

committee. We also recommend that Micron pay for any contracted monitoring expert. All reported information should be regularly reported and updated to the local community on a publicly accessible website that could be managed by the committee.<sup>121</sup>

Central New York has had too many experiences with private companies making lofty promises in exchange for hundreds of millions of taxpayer dollars, only for those promises to go unfulfilled. With one of the highest poverty rates in the country, Syracuse has perhaps the most to gain economically from Micron's investment. Central New York cannot afford another broken economic investment like Destiny USA.<sup>122</sup> Now must also be the time that Micron, with support from local, state, and federal public officials, makes enforceable commitments to creating good jobs for Central New York residents in exchange for this historic public investment.

## **Housing**

The DEIS does not provide adequate plans to mitigate the impact that Micron's induced population growth can have on an already stressed housing market. In particular, the DEIS understates the potential impact that Micron could have on the rental and housing market and fails to provide adequate evidence to back up its claims in this regard. The DEIS also does not detail any specific plans that Micron has to work with the state or county to mitigate stress on the housing market or expand affordable housing. Without meaningful details, it is unclear if or how Micron and state and county government agencies intend to expand the availability of mixed income affordable, climate friendly, and safe housing.

### *Regional Housing Market Trends*

Accessibility to affordable housing is a serious concern in the local and regional study area, particularly in Syracuse. Likely due to population growth in the Syracuse area over the last two years, the rental market in Syracuse is incredibly competitive, leading to high prices that cause low-income residents to struggle to afford housing. Syracuse was recently listed as one of the most competitive rental markets in the country according to a study by Apartment Advisor.<sup>123</sup> The cost of renting an apartment in the city of Syracuse rose 23% over the last two years alone.<sup>124</sup> The 2024 Empire State Development (ESD) study analyzing the impact that Micron will have on housing cited that median rents in Onondaga County are 40% higher than

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<sup>121</sup> Los Angeles World Airports (LAWA) provides an example of how a CBA can incorporate both environmental and socioeconomic benefits. LAWA has a CBA with the local community that includes community benefits and impact mitigations provided by LAWA as part of the LAX Master Plan Program. Some of the environmental provisions include: three studies around the environmental impact on the community that LAWA will fund, measures to reduce emissions related to aspects of airport operations, and environmental mitigations and commitments related to airport construction. It also includes an ongoing role for the LAX Coalition to both implement and oversee these benefits and hold LAWA accountable with mitigation. Los Angeles World Airports (LAWA). N.d. "Community Benefits Agreement (CBA)."

<https://www.lawa.org/lawa-our-lax/community-benefits-agreement>.

<sup>122</sup> Moriarty, Rick. 2024. "Destiny USA facing foreclosure after missing loan deadline, rating agency reports." *Syracuse.com*, September 4.

<https://www.syracuse.com/business/2024/08/destiny-usa-facing-foreclosure-after-missing-loan-deadline-rating-agency-reports.html>.

<sup>123</sup> Milman, Lilly. 2024. "The Most Competitive Rental Markets Right Now." Apartment Advisor. August 8.

<https://www.apartmentadvisor.com/blog/post/the-most-competitive-rental-markets-right-now>.

<sup>124</sup> Onondaga County. 2024. "Onondaga County Housing Needs Assessment." June.

[https://plan.ongov.net/wp-content/uploads/2024/06/OnondagaHousing\\_JUNE2024\\_FINAL.pdf](https://plan.ongov.net/wp-content/uploads/2024/06/OnondagaHousing_JUNE2024_FINAL.pdf).

what the standard renter can afford to pay and that median home prices in the county rose more than 85% from 2012 to 2023. Across counties in CNY, high rents are also an issue, with the ESD study citing that median rents across counties rose from 46 to 83% since 2011.<sup>125</sup>

Economic inequality and segregation are prevalent in Onondaga County, particularly in Syracuse. Syracuse's poverty rate is 30.1%, nearly 20% higher than the national average.<sup>126</sup> Onondaga County is highly segregated by income, with lower-income households concentrated in the city and higher-income households outside the city. Although Syracuse has 30% of the county's households, it only contains 20% of households with incomes above \$50,000. Furthermore, Syracuse has about 47% of county households with incomes of less than \$50,000, and the poverty rate inside Syracuse is four times the poverty rate in the rest of the county.<sup>127</sup> Forty percent of households in Syracuse are renters and the city is disproportionately made up of low-income households. Forty-six percent of Syracuse households earn less than \$35,000 and pay more than 30% of their income on housing. And only four of Syracuse's twenty-eight neighborhoods scored well for exterior upkeep according to the study.<sup>128</sup>

Onondaga county's housing infrastructure is a major issue with extremely outdated housing infrastructure that has led to health and safety issues for residents including numerous homes detecting lead contamination.<sup>129</sup> The DEIS also makes references to the City of Syracuse study noting that "the Syracuse housing market was struggling with chronic maintenance issues related to extensive low demand. Market conditions had disincentivized private, unsubsidized investment into the housing stock, leading to soft sub-markets with roughly one-third of all residential properties in the city in 'visible decline'."<sup>130</sup> In addition to creating new housing, Micron's in-migration impacts will require the county to update existing housing infrastructure to protect the safety of current residents.

### *Household Growth*

The DEIS states that "The household growth anticipated from Micron's worker populations at a community level would be of a scale that may be readily noticeable in terms of increased population densities, as well as increased commercial and residential activity" (p. 3-493). The estimated population growth is 64,000, with 27,000 new housing required in the 5 county study area (p. 3-491); 85% of this is estimated to be in Onondaga County and 32% of that within Syracuse. The DEIS states that this in-migration and growth would be "[l]arge enough to alter local and regional housing markets" (p. 3-493).

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<sup>125</sup> HRA, EDR, and Highland Planning. 2024. "Building a Healthy Housing Market in Central NY A Roadmap for Regional Action Amid Historic Investment in the Semiconductor Industry." Empire State Development. December 2024. <https://esd.ny.gov/sites/default/files/media/document/CNYHousingMarketStudy.pdf>.

<sup>126</sup> Ibid.

<sup>127</sup> City of Syracuse by czbLLC. 2024. "Syracuse Housing Strategy." September, P. 17. <https://www.czb.org/work/syracuse-housing-strategy>.

<sup>128</sup> Ibid.

<sup>129</sup> Kelly, Margie. 2024. "Syracuse Lead Levels Among the Highest Detected in Drinking Water for Decades; Higher than Flint and Newark." 2024. NRDC. October 16. <https://www.nrdc.org/press-releases/syracuse-lead-levels-among-highest-detected-drinking-water-decades-higher-flint-and>.

<sup>130</sup> Kanuss, Tim. 2023. "Study lays bare the devastating economics of Syracuse's affordable housing crisis." Syracuse.com, March 1. <https://www.syracuse.com/news/2023/03/is-syracuse-too-poor-to-attract-new-housing-study-cites-obstacles-to-grow/>h.html.

In addition, the DEIS includes conflicting information about Micron’s impact on the area housing and rental market. Section 3.15.3.2 notes: “The in-migration of workers and families for construction of the Proposed Project in the local and regional study areas would not create direct or indirect effects to real property and housing within the local and regional study areas” (p. 3-482). However, when it comes to providing housing for Phase 1 construction workers the DEIS states that, “Because Micron construction would begin as soon as practicable after all applicable regulatory approvals are secured, the local study area would likely not be able to provide new housing stock necessary to accommodate a substantial number of Phase 1 construction workers and their families.” (p. 3-493). Additionally, according to the DEIS, “there would be rent pressures attributable to the Proposed Project’s induced growth in markets beyond the local study area”(p. 3-494) and “The Preferred Action Alternative’s induced housing demand may lead to rent increases and the potential to indirectly displace residents who cannot afford rent increases” (p. 3-502).

In the Growth Inducing Effects section, the DEIS states, “The Proposed Project’s induced population would be large enough to alter local and regional housing markets. . . the Project’s induced growth would generate housing demand at a scale not experienced since the 1970s.” The report goes on to note, “The in-migrating labor force would increase the demand for housing and exceed available vacant supplies in the local study area.” (p. 3-493).

These contradictions must be clarified in the EIS. The DEIS fails to quantify the magnitude of expected impacts, raising serious questions about its claim that housing effects will be short-term. The EIS must provide further analysis and projections to support Micron’s claim that the project will only have short-term impacts on housing costs.

According to the Syracuse housing strategy, “7,605 households in Syracuse received some form of assistance in 2021 to alleviate cost burdens. Existing levels of housing cost assistance would have to triple to meet the needs of the 15,258 cost-burdened renters while continuing to assist these 7,605 households.”<sup>131</sup> This tripling isn’t even accounting for the rising housing cost which Micron related in-migration will induce.

The DEIS presents no details on projected price increases or housing cost trends tied to population growth. Without such projections, how can the DEIS claim that Micron’s impact on the housing market will only be ‘short term?’ Will there be an increasing number of unhoused residents as a result of rising housing costs? And if so, what mitigation measures will be established to avoid an adverse impact? What will be the implication for unhoused populations or residents on fixed income such as seniors? If such an assessment exists, the details should be included in the EIS. If such assessments are not available, these impacts must be estimated utilizing appropriate and best available methods and professional judgement, and disclosed as part of the EIS.

The ESD housing study determined that “Micron will require 30,000 new homes, most of them by 2038. This will require more than tripling the pace of home development in the coming years and then sustaining development at nearly 2X the current rate for at least a decade. The homes being built need to reflect what jobs pay. This will allow filtering up and down while reducing competition for existing and

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<sup>131</sup> HRA, EDR, and Highland Planning. 2024. “Building a Healthy Housing Market in Central NY A Roadmap for Regional Action Amid Historic Investment in the Semiconductor Industry.” Empire State Development, December. <https://esd.ny.gov/sites/default/files/media/document/CNYHousingMarketStudy.pdf>.

new homes. Expected incoming residents will earn incomes across a wide spectrum generally higher than regional median income today.”

The study also determined that housing impacts will begin early on in Micron’s development noting that, “Job growth will lead to significant early net new housing demand, with up to 19,000 new homes needed by 2028 and up to 32,000 needed by 2038 and onward” and “Shorter-term, flexible solutions to absorb a rapid increase in housing demand will need to be accompanied by longer-term housing production at the price points affordable to incoming workers.”<sup>132</sup>

### *Housing Mitigation Measures*

In Section 4 (Cumulative Impacts), amongst other things listed in Table 4.2-1, *Present and Reasonably Foreseeable Actions*, are housing developments currently planned and in some stage of development. The table includes 5,852 housing units, far short of the 27,546 estimated to be required by Micron’s in-migration. Further, none of the listed units have been designated as “affordable.”

In Appendix Q, under the *Real Property, Housing, Relocation, and Displacement* section, it references identified housing plans that could create an estimated 4,000 new residential units in Clay and up to 6,800 new households could be introduced within the Towns of Clay and Cicero by 2041 (p. Q-29).

However, as the ESD study shows, this is: 1) not nearly enough housing to meet induced growth demands; 2) the DEIS does not include any reference to affordable housing in the listed new development plans; and, 3) these new developments are only specific to the local study area and therefore neglect Syracuse, which has the highest need for new housing development. In Syracuse, less than one in five residents could afford new and planned developments.<sup>133</sup> The ESD study underscores the unaffordability of new developments in the region, citing: “Fewer than half of new households will be able to afford newly built homes given current market conditions and costs. Only 1% of the estimated zoned capacity exists in strong markets, meaning the market cannot feasibly deliver homes to meet a range of needs.”<sup>134</sup>

The *Growth Inducing Effects* section poorly explains how the growth induced impacts of the community will be met. It praises, in the abstract, the benefits that are estimated or intended to result from fab development and from rising home values but minimizes the adverse impacts which will likely arise without adequate preparation, infusion of funding and citizen oversight and engagement. See Socioeconomic impact section.

It is unclear if there has been any analysis of existing comprehensive plans and zoning to assess the feasibility of developing the additional housing units needed to reach the projected 27,000 new homes. The DEIS asserts that the Onondaga County Comprehensive plan has this all laid out, though this plan is not enforceable on the county’s towns (p. 3-33). The EIS should include a table summarizing where development will or can occur to substantiate the ability for the region to accommodate in-migration. A table listing towns, status of their plans, and the estimated number of units reasonably expected to be

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<sup>132</sup>Ibid.

<sup>133</sup> City of Syracuse by czbLLC. 2024. “Syracuse Housing Strategy.”

<sup>134</sup>HRA, EDR, and Highland Planning. 2024. “Building a Healthy Housing Market in Central NY A Roadmap for Regional Action Amid Historic Investment in the Semiconductor Industry.” Empire State Development. December. <https://esd.ny.gov/sites/default/files/media/document/CNYHousingMarketStudy.pdf>.

accommodated (given existing plans, zoning, travel patterns, etc.) would be useful to clearly see the basis for the claim that the housing market will adjust to meet demand.

In response to the project's 'short-term' impact of "rent increases and the potential to indirectly displace residents who cannot afford rent increases," the DEIS states: "potential significant adverse effect will be addressed through the provision of additional affordable housing supply facilitated by investments from the State of New York through Governor Hochul's long-term statewide housing approach and New

York Housing Compact initiatives; and local initiatives like the Onondaga County Housing Initiative Program (O-CHIP) and the OCIDA's tax exemption program for housing projects" (p. 3-502). While grant programs like these are important and are an example of the types of affordable housing subsidies needed, it is dubious that this program alone will mitigate the risk of increased housing insecurity in the region.

In the mitigation measures (section 3.15.4) the DEIS claims, "Micron does not control the housing market and cannot specifically mitigate such effects," stating only that Micron will "continue to work with agencies and stakeholders to identify specific actionable measures to avoid or minimize the potential for short term significant adverse effects [on the local housing market]." The EIS should detail Micron's specific plans to work with agencies and local stakeholders (p. 3-503). The public needs specific assurances that housing disruptions will be mitigated and needs more than a hopeful and non-committal 'work with.' As is discussed more below, we need specific and measurable objectives to which Micron must be held accountable.

To ensure these solutions are set into motion, the ESD study recommends that decision-makers must take advantage of what they call "Housing Opportunity Areas" or "places that have room to grow while also minimizing the costly impacts of sprawl and maximizing the revitalization potential of new housing." This must utilize "smart growth alignment," or solutions that take into consideration factors such as location, infrastructure, population density, natural resources, among other considerations. The DEIS makes a few references to smart growth alignment strategies but does not go into detail on how they expect to execute these plans.

In particular, in the *Funding for Local Governments and Taxing Districts* section, the DEIS states, "Many municipalities are planning for growth or have plans already in place to manage growth by applying smart growth principles" (p. 3-499).

As noted, the DEIS states that Micron will need to "work with local agencies and local stakeholders to identify specific actionable measures to avoid or minimize the potential for this short-term significant adverse effect on the local housing market." (p. 3-213) Has Micron set in motion these plans to start working with agencies and local stakeholders yet? The ESD housing study makes clear the urgency of developing these plans, stating: "Growth related to Micron will require 30,000 new homes, most of them by 2038. This will require more than tripling the pace of home development in the coming years and then sustaining development at nearly 2X the current rate for at least a decade."<sup>135</sup>

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<sup>135</sup>HRA, EDR, and Highland Planning. 2024.

Notably, the ESD study states that due to job growth the region will need up to 19,000 homes by 2028, but the DEIS only makes note of the need for 32,000 by 2038.<sup>136</sup> The study highlights the need for policy intervention to mitigate the risks of undue stress on an already stressed housing market and warns that without regulatory action the risk of displacement to low-income residents becomes higher. The study recommends regulatory interventions such as creating more diversified housing and sustainable housing types by allowing for denser and smaller homes.

The study also emphasized the need for public subsidies by emphasizing, “Notably, about half of the rental demand is likely infeasible without subsidy.” However, it is unclear if there will be any additional public subsidies planned outside of the existing O-CHIP program or the Syracuse Choice Neighborhood. To meet demand for low-income housing, Micron and local agencies should invest in programs that will further subsidize affordable housing for low-income residents. The EIS should make clear if any additional subsidy programs are being planned and whether these are part of the municipal plans mentioned or Micron’s collaboration with local agencies and stakeholders. Furthermore, the EIS should clearly detail what, if anything, Micron will contribute to these programs.<sup>137</sup>

It is crucial that Micron create and implement plans to work with local agencies and stakeholders, including developing municipal smart growth plans, in order to prepare the region and ensure that low-income residents do not continue to bear the burden of adverse impacts. State and municipal agencies, alongside Micron, should work with local communities to build and inform these plans.

#### *Household Growth and Environmental Analysis*

Minimizing the carbon footprint of the induced household growth should be required in order to offset the emissions associated with Micron’s Clay, NY fabs, costs which Micron should be required to fund. Financial requirements to fund off-site mitigation measures should be imposed on Micron to offset fab-related GHG emissions that they claim are otherwise impossible to eliminate. Micron can take concrete steps by funding projects that could reduce the GHG emissions associated with induced residential and commercial growth. For example, Micron could contribute to financing renewable energy projects, offsetting the cost of higher standard energy codes for new development, incentivizing transit-oriented and walkable communities, encouraging commuting via transit, and supporting the construction of affordable and green housing. The costs of eliminating these GHG/climate-related impacts should be covered by Micron as a condition of approving the fab development project, binding mitigation measures, including a publicly reported mitigation plan with measurable objectives, must be established to offset the adverse impacts of the induced growth.

Micron will have a significant impact on housing needs as the number of employees grows. Therefore, a cooperative effort between Micron and state and county government agencies is needed to expand the availability of mixed income, affordable, climate friendly, and safe housing. This includes the protection of existing affordable housing, expanding code enforcement to protect tenants, and ensuring appropriate capital maintenance upgrades. Affordable housing must include state-of-the-art, climate-friendly designs that rely on renewable energy and provide low-cost energy access. Without strong commitments from Micron to protect and expand safe and affordable housing in CNY, and particularly within the city of

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<sup>136</sup> Ibid.

<sup>137</sup> Ibid.

Syracuse, the project will only exacerbate the problems in an already inequitable and strained housing market.

## **ENVIRONMENTAL JUSTICE**

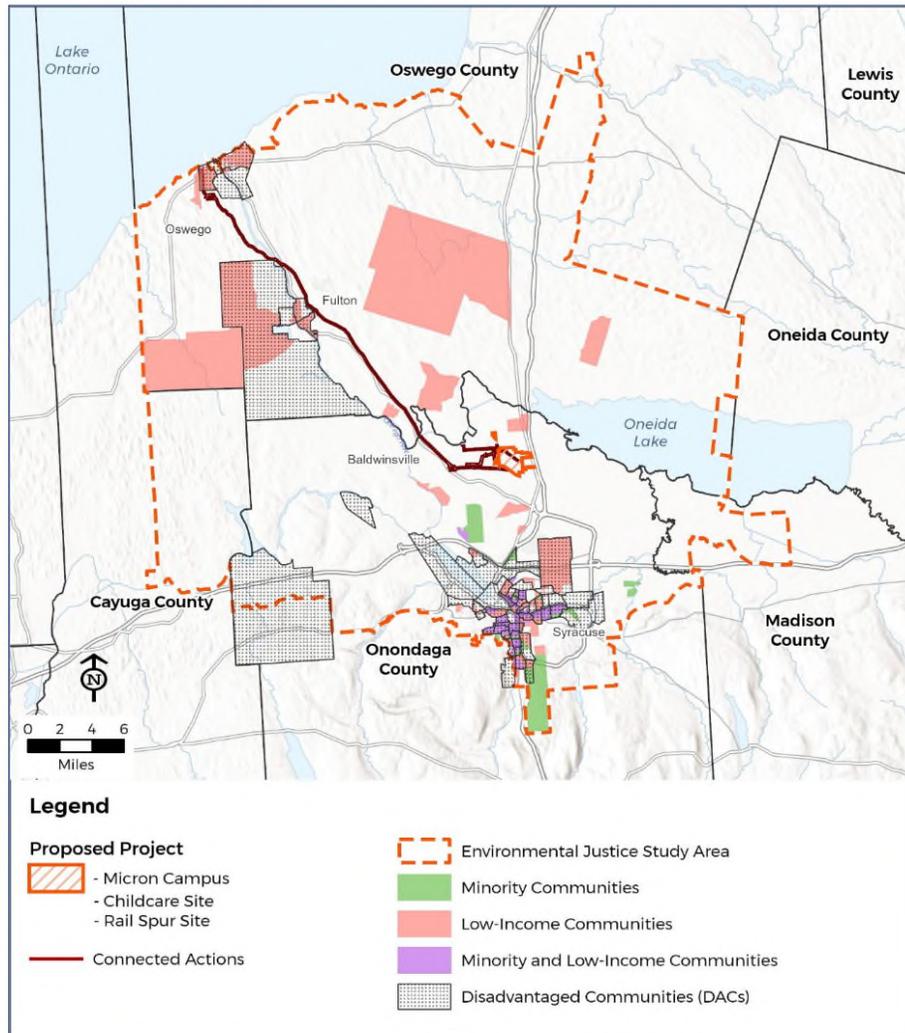
### **Disadvantaged Communities in Local and Regional Study Area**

Micron megafab has the potential to create significant environmental impacts to the local and regional study area. This is particularly concerning given the prevalence of racial and economic inequality in CNY and the megafab's proximity to disadvantaged communities like those in Syracuse.

One area of concern is that the DEIS fails to justify its decision to only include Disadvantaged Communities (DACs) within the five mile radius area. While the DEIS notes, "DACs have been designated within the study area, which largely overlap with the identified minority and low-income communities discussed above (see Figure 3.16-2). Within the study area, DACs were identified primarily in the City of Syracuse, Village of Baldwinsville, City of Fulton, and City of Oswego" (p. 3-511). The DEIS concludes that there are no environmental justice impacts and the Micron fab will not adversely impact DACs: "Because the closest DAC to the Proposed Project is five miles south in the North Syracuse area, the Proposed Project is not likely to disproportionately burden or otherwise impact a DAC and is therefore not subject to the requirements of policy DEP 24-1" (p. 3-511).

The draft's reasoning for limiting the radius to 5-miles is not clear, especially given the potential for impacts on DACs within a 10-mile radius that are not properly evaluated (more below). The DEIS claims, "Although an expansive study area was selected to be inclusive and to include study areas from other technical analysis, the potential adverse effects from construction and operation of the Preferred Action Alternative on DACs and minority or low-income communities are expected to be limited to within an approximately 5-mile radius around the Proposed Project sites, and a ½ mile of the Connected Actions." (p. 3-511-512). How can the impact be considered limited to 5-miles when the DEIS noted instances in which the project will affect DACs within a ten-mile radius through socioeconomic impacts from induced growth, and when it fails to comprehensively analyze potential impacts from air and water pollution caused by hazardous substances, flooding from increased impervious surfaces, health and safety risks from toxic chemicals, and occupational health safety risks to DAC workers handling these chemicals? The five mile limitation is a major flaw in the environmental justice analysis that must be rectified.

**Figure 3.16-2 DACs and Minority or Low-Income Communities in Study Area**



Sources: World Street Map: Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, EPA, NPS

## Human Health and Safety Impacts

The DEIS does not adequately incorporate analyses from other sections (e.g. GHG emissions, water pollution, and toxic waste disposal). In general, policymakers and customers have been shown to downplay the ecological footprint of semiconductor manufacturing in favor of prioritizing supply security.<sup>138</sup> Due to the huge quantities of raw material and waste produced during the fabrication process,<sup>139</sup> toxicity concerns will likely be more significant than stated in the DEIS.

<sup>138</sup> “Chip Production’s Ecological Footprint: Mapping Climate and Environmental Impact.” n.d. Accessed July 22, 2025. <https://www.interface-eu.org/publications/chip-productions-ecological-footprint#conclusion>.

<sup>139</sup> Ruberti, Marcello. 2023. “The Chip Manufacturing Industry: Environmental Impacts and Eco-Efficiency Analysis.” *Science of The Total Environment* 85, February:159873. <https://doi.org/10.1016/j.scitotenv.2022.159873>.

With this in mind, the DEIS does not properly address the Onondaga Nation's water quality concerns as stated in comment a comment letter dated March 26, 2024 (p. 3-519), especially regarding toxic water pollution (including PFAS forever chemicals), siphoning from Lake Ontario, and dumping into Lake Ontario and the Oswego river. The DEIS is also unacceptably vague in its description of water quality concerns (specifically toxic chemicals including PFAS) in and around the Oswego pumping station, as well as wastewater release into the Oswego River, which flows out of the ½ mile radius from connected actions and intersects several DACs near Himmansville.

As discussed in the Human Health and Safety and Solid Waste, Hazardous Waste, and Hazardous Materials sections of this comment, the DEIS fails to assess the cumulative impacts of PFAS, industrial Greenhouse Gases, and Extremely Hazardous Substances in its Cumulative Effects analysis. The final EIS should clearly assess the cumulative impacts on DACs in the region of potential drinking water contamination. If chemicals released in wastewater affect the safety of drinking water for the entire region, DACs and low income communities that suffer from pre-existing water contamination issues (e.g. from lead pipes) stand to be harmed most of all. This assessment should include the potential cumulative impacts of direct supply chain companies that the project is expected to attract to the area, including related activities, such as research and development, chemical suppliers, and even competitors. These facilities may also release hazardous substances into Onondaga County's wastewater system.

Without a comprehensive understanding of the types and amount of PFAS discharges on site and for anticipated sites across the region, cumulative impacts for surface water, groundwater, air emissions, and environmental justice cannot be understood.

As discussed further in the Human Health and Safety Section of this comment, the draft is vague about how PFAS waste will be handled offsite, offering no assurance that destruction technologies will be used or that environmental justice impacts will be avoided (p. 3-241). These gaps are unacceptable given the well-documented health risks and extreme environmental persistence of PFAS. The DEIS identifies several contractors for handling Micron's hazardous waste (p. 3-224). Hazardous waste generators in the study area typically contracted with private haulers authorized by NYSDEC and other out-of-state agencies to transport hazardous waste to permitted hazardous waste treatment, storage, and disposal facilities. Some types of hazardous waste may be transported to out-of-state facilities for reuse and recovery, such as fuel blending and energy recovery facilities with approved cement kilns, including Veolia in Middlesex, New Jersey; Green America in Hannibal, Missouri; and Systech in Fredonia, Kansas.

As noted, relying on offsite shipment of hazardous materials to third-party contractors does not eliminate hazardous waste—it simply displaces it, often to communities with less political and economic power. Moreover, if third-party contractors plan to incinerate the hazardous materials, this process produces an even more concerning environmental impact in the form of toxic air emissions and PFAS-laden ash.

#### *Waste Destination Safeguards Recommendations*

- Require Micron to disclose where all offsite hazardous waste—including PFAS-containing waste—will be sent for treatment or disposal.
- Prohibit shipment to facilities with poor environmental records or those located in environmental justice communities without prior public engagement and review.

- Conduct an environmental justice impact assessment for all offsite waste management strategies.

## **Air Quality**

The DEIS splits analysis between Disadvantaged Communities, Minority Communities, and Low-Income Communities – and is inconsistent in addressing all three in terms of impacts from Greenhouse Gases, changes in Air Quality, and other sections (p. 3-522).

As noted in the Solid Waste, Hazardous Waste, And Hazardous Materials Section of this comment, most of the monitoring data for criteria air pollutants (those with established NAAQS) on which this assessment relies comes from monitors in Rochester, NY, more than 70 miles from the project site. Only ozone and small diameter particulate matter (PM<sub>2.5</sub>) are measured in the Syracuse area. Conditions in Rochester may be expected to be similar, but Micron should at least be required to demonstrate – with actual local monitoring data – that the facility will not have any significant environmental impacts. In particular, the DEIS ought to address how its own air pollutant emissions may exacerbate pre-existing air quality concerns in DACs. In addition, the DEIS does not allow for or consider the impacts of any exceedances, upsets, or violations in assessing the environmental impacts of air emissions. Consequently, this analysis lacks how issues related to air quality could impact DACs especially within the larger 10-mile radius.

### *Health Monitoring and Transparency Recommendations*

The DEIS mentions air and water quality monitoring, but it lacks detail on how data will be shared with the public and how health outcomes will be tracked over time. We recommend establishing a community advisory board to oversee environmental monitoring and ensure transparency must be considered.

## **Community Engagement**

For community feedback on their proposal, Micron only lists two meetings with a total of 45 people. Micron mentions a consulting Community Engagement Committee, but this consultation only related to Micron's financial commitments, not environmental or community impacts. Micron unreasonably claims its contribution to climate change is a global and regional issue, and therefore not a local environmental justice issue.

While public hearings and translation services are a good start, many residents in EJ communities may still face barriers to participation, including digital access, transportation, and language. The project sponsors should consider proactive outreach, including door-to-door engagement, community liaisons, and partnerships with trusted local organizations.

Lastly, the CEC Priorities Document<sup>140</sup> outlines several community priorities that are not actualized in Micron's plans as detailed in the DEIS. These missing priorities are discussed in further detail under the Transportation & Traffic and the Housing sections of this comment. Comprehensive engagement and enforcement of community priorities particularly around issues that already impact DACs like rent

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<sup>140</sup> CNY CEC. 2024. "Harnessing Opportunity: Community Priorities for Central New York: Community Priorities Document." June. <https://www.cnycec.org/community-priorities-document>.

burdens, inequitable transportation, and the adverse impacts of adverse growth on low-income communities are a key aspect of reducing environmental justice impacts.

As discussed in the Socioeconomics section of this comment, Micron should establish a community monitoring committee that includes community members and worker representatives to monitor and hold Micron accountable to community priorities.

### *Equity in Benefits Recommendations*

As stated in the Socioeconomic section of this comment, the commitments outlined in Micron's Community Investment Framework must be enforceable, as well as publicly overseen and reported, to ensure EJ communities have equitable access to tangible, measurable benefits. A robust Community Benefits Agreement (CBA) is the optimal vehicle to deliver both economic prosperity and environmental protection for those most deeply impacted by development projects.

To give an example of how this has been successfully executed in the past, Los Angeles World Airports (LAWA) has a CBA with the local community that includes community benefits and impact mitigations as part of the LAX Master Plan Program.<sup>141</sup> Some of the environmental provisions include: three studies around the environmental impact on the community that LAWA will fund, measures to reduce emissions related to aspects of airport operations, and environmental mitigations and commitments related to airport construction. It also includes an ongoing role for the LAX Coalition to both implement and oversee these benefits and hold LAWA accountable with mitigation.

### **Housing**

The draft DEIS notes that for DAC and low-income communities Micron would not “cause or increase a disproportionate burden within those communities, except a potential temporary adverse impact on housing and rent pricing” (page 3-529). This adverse impact is the result of in-migration of workers and families to work at Micron, with potential to increase rental rates and housing demands. The DEIS claims this will be mitigated over the long-term through creation of new housing stock in the surrounding region (e.g., page 3-518 - 3-519). However, there is no guarantee that this stock will mean affordable options for residents of low-income and DAC communities. The DEIS also suggests that this can be mitigated by the identification of federal, state and local initiatives to support affordable housing within the local and regional study areas, and that Micron “will continue to work with agencies and local stakeholders to identify specific actionable measures to avoid or minimize the potential for this short-term significant adverse effect on the local housing market” (page 3-527). As noted in the Housing section of this comment, the public needs assurances that housing disruptions will be mitigated, especially for DAC communities who already bear the burden of an inequitable housing market. The EIS must be more clear about what specific plans Micron has to work with agencies, and should not be contingent upon hypothetical policy actions or funding allocations by public bodies that may or may not materialize. At best this approach is hopeful, at worst it is an attempt to shift the burden of mitigating housing impacts to public agencies.

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<sup>141</sup> Los Angeles World Airports (LAWA). N.d.

### *Housing Recommendation*

The final EIS must provide further analysis of how projected price increases in rental or housing costs tied to population will impact existing DACs or create new DACs. The final EIS should also include an analysis of actional alternatives that can adequately mitigate these adverse impacts on DACs. As noted in the Housing section of this comment, the final EIS must also detail Micron's plans to create and implement plans to work with local agencies and stakeholders, including developing municipal smart growth plans, in order to prepare the region and ensure that DACs do not continue to bear the burden of adverse impacts. Mitigating measures relating to growth-inducing impacts can be incorporated through a community negotiated and enforceable community benefits agreement (CBA).

### **On-Site Childcare**

Micron plans to provide on-site childcare for its workers. While this can be very beneficial to disadvantaged workers, especially in reducing gender gaps in the workforce, childcare proximity to industrial manufacturing poses several concerning health risks for the children and workers at the childcare center. Syracuse has the highest child poverty rate (46%) of any U.S. city and a high overall poverty rate of 29.6% (p. Q-18-19). Assuming affordable childcare alternatives are not available to low-income workers, then low-income children may be disproportionately represented at the on-site childcare center, and therefore disproportionately impacted by environmental hazards. If the proximity of the childcare center to industrial manufacturing is determined to pose a significant health risk to children and workers, then the EIS must account for the impact that children from DACs will face at the childcare center.

Children are particularly vulnerable to health risks associated with environmental and industrial contamination, and childcare facilities are important sites of potential exposure that can have cumulative effects across a lifetime.<sup>142</sup> Micron's planned childcare center is located downstream of its main campus, close to the existing Oneida River floodplains. Aside from noting that the childcare center will be "located outside of special flood hazard areas (SFHAs) and 500-year floodplains" (p. 3-70), the company does not seem to consider the impact of water pollution from their main campus potentially reaching the childcare center during a spill event. Additionally, the DEIS does not explicitly describe the impact of air pollution on the childcare center. As we note in the section on Solid Waste, Hazardous Waste, and Hazardous Materials, in order to ensure a release of toxic gas would not put children at its childcare center at risk, Micron or DEC should conduct dispersion modeling for the most hazardous gases such as arsine.

As noted in the Flooding section of this comment, the DEIS provides little evaluation of how the Oneida floodplain will change near the childcare site from the increased stormwater runoff from their main campus. In particular, stormwater quantities associated with the Rail Spur, Childcare Center, and the Wastewater Treatment Plant expansion have not been quantified. Water quality impacts of this stormwater are not addressed.

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<sup>142</sup> Tollefson, Jonathan, Scott Frickel, Summer Gonsalves, Thomas Marlow, Robert Sucsy, Michael Byrns, and Melissa Orpen-Tuz. 2023. "Early Childcare and Education in a Post-Industrial Landscape: Inequalities in Proximity to Active and Relic Manufacturing in Metropolitan Providence, Rhode Island." *Environmental Justice (Print)* 16 (4): 309–20. <https://doi.org/10.1089/env.2021.0121>.

### *Childcare Recommendation*

The Final EIS should a) rigorously evaluate the range of potential impacts on children and childcare workers at the childcare site from exposure to toxic air emissions, wastewater runoff, flooding potentially involving toxic waste water, and groundwater and soil contamination; b) assess all possible measures that can be taken to mitigate exposure risks including the consideration of re-siting the childcare center.

### **Socioeconomic Impacts on DACs from Growth Inducing Effects**

The DEIS notes that “it can be reasonably concluded that many of the DACs and minority or low-income communities within the study area would be unaffected by the Preferred Action Alternative (aside from growth inducing effects, which are discussed qualitatively under “Growth Inducing Effects,” below)” (p.3-511).

As noted in the Socioeconomics section of this comment, economic inequality and segregation is prevalent in CNY, particularly in Syracuse. Syracuse, the most populous city in Onondaga County,<sup>143</sup> has a poverty rate of 29.6%, nearly 20% higher than the national average (p. Q-18-19).<sup>144</sup> In fact, using NYSDEC’s Disadvantaged Communities Assessment Tool (DACAT) Micron’s environmental justice study noted: “At least 52.42 percent of the population in an urban area reported themselves to be members of minority groups (NYSDEC’s CP-29 defines minority population as a population that is identified or recognized by the U.S. Census Bureau as Hispanic, African-American or Black, Asian and Pacific Islander or American Indian (i.e., Indigenous Nations populations); or At least 26.28 percent of the population in a rural area reported themselves to be members of minority groups; or At least 22.82 percent of the population in an urban or rural area had household incomes below the federal poverty level (NYSDEC, n.d.-e)” (p. 3-508). As such the study area clearly identifies DACs, notably concentrated in Syracuse and Baldwinsville. And Syracuse in particular encompasses both DACs, minority and low-income communities, and minority communities (see table 3.15-2 below, p. 3-509).

However, as noted above, the limited 5-mile radius excludes many of these portions of Syracuse who will still be impacted by Micron’s project in numerous ways. In particular, the induced impacts of the project may exacerbate income inequality in the region if Micron’s direct and indirect new jobs are skewed toward the low end of the industry wage scale, limiting workers’ disposable income to spend on locally serving businesses. As cited in the Socioeconomics section, this concern is especially relevant in a region where the top two industries are retail trade (21.8 %) followed by accommodation and food services (11.3%) (p. Q-38), sectors that consistently offer among the lowest wages. In Onondaga County, in particular, the DEIS notes: “approximately one-quarter of the resident labor force is employed in the retail trade sector” (p. Q-39).

With the projected creation of over 33,000 indirect jobs, many of these will likely be in the low-wage service sector. Within this low-wage sector, retail industry jobs pay the lowest, with most retail jobs

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<sup>143</sup> Data Commons. 2023. “Ranking by Population: All cities in Onondaga County.” [https://datacommons.org/ranking/Count\\_Person/City/geoId/36067](https://datacommons.org/ranking/Count_Person/City/geoId/36067).

<sup>144</sup> Misiaszek, Emma. 2023. “Syracuse ranks 2nd in economic disparity for Black residents, according to LendingTree study.” CNY Central, September 6. <https://cnycentral.com/news/local/syracuse-ranks-2nd-in-economic-disparity-for-black-residents-according-to-lendingtree-study>.

earning less than the average private sector job. In real terms, retail wages have been in decline since the 1970s with current retail wages at just 72% of what they were in 1972. On top of low wages, retail workers rarely receive benefits or formal training.<sup>145</sup> Without properly accounting for the impact that Micron’s arrival will have on the creation of low-wage spinoff jobs, it is possible that Micron’s cumulative socioeconomic impacts will have negative effects on the local and regional study area and DACs in particular. This must be evaluated and recognized, not dismissed as insignificant as the DEIS attempts to do.

### *Socioeconomic Impacts on DACs Recommendations*

As recommended in the Socioeconomics section of this comment, to mitigate adverse growth inducing effects, we recommend the creation of a community advisory committee established under a CBA to oversee all actions relating to the induced growth and mitigation of its effects on DACS. Additionally, we recommend the creation of an independent planning team made up of professional, certified planners established under a CBA to oversee, review, and manage growth--related mitigation measures. These recommendations require adequate funding for staffing of the planning team and the advisory committee, as well as funding for incentives or subsidies needed to mitigate problems related to growth inducing impacts.

## **APPENDIX A. CONTRIBUTORS**

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<sup>145</sup> Carré, Françoise, and Chris Tilly. 2017. “A Global Look at What Makes U.S. Retail Jobs so Bad.” Perspectives on Work: Retail Workers.

## KATHERINE COHN

650.465.9099 katherinecohn@gmail.com

### EDUCATION

University of California, Berkeley, Goldman School of Public Policy, M.P.P. Sept 2020 - May 2024  
Relevant Coursework: Econometrics, Policy Analysis, Critical Race Theory, Public Management and Policy Implementation, Program Evaluation. Berkeley Public Policy Journal. *Nominated for Smolensky Prize for Outstanding Policy Analysis (for capstone).*

Columbia University, Graduate School of Arts and Sciences, M.A. in Art History Sept 2014 - May 2017  
Program: Modern Critical and Curatorial Studies, produced 9 publications.

Oberlin College, B.A. in East Asian Studies. *Received Freeman Research Grant.* Sept 2002 - May 2006

### SELECT PROFESSIONAL EXPERIENCE

**CHIPS Communities United** (remote) Jan 2024 – Present *Policy Analyst*

- Research & analyze policy on chemical safety, worker health, and environmental justice in the semiconductor industry. • Design & apply strategic advocacy research, e.g. DELPHI panels, best practice frameworks, campaign materials, etc. *Policy Consultant*
- Assess risk of toxic exposure to workers & fence-line communities of semiconductor manufacturing. • Needs assessment: fed & state regulation scans, archival research, info interviews, BLS & CHNA data analysis.

**UCSF Benioff Children’s Hospital of Oakland**, Oakland, CA (hybrid) Sept 2022 – Jan 2023 *Student Analyst*

- Analysis of hospital’s policies with goal of improving local hiring, workforce development and impact purchasing. • Quantitative and qualitative research and analysis including multiple surveys, facilitate stakeholder meetings.

**UC Berkeley School of Law Policy Advocacy Clinic** (PAC), Berkeley, CA (hybrid) Sept 2021 – Nov 2022 *Policy Student Researcher*

- Quantitative and qualitative research and analysis; drafted bill, fiscal memo for bill sponsor, testimony prep. • Research and identify stakeholders; facilitate stakeholder meetings, campaign strategy sessions.

**Mason Tillman Associates**, Oakland, CA (remote work) May 2021 – Aug 2021 *Policy Analysis Intern*

- For a firm specializing in disparity studies, produced literature reviews, quantitative (Excel) and qualitative analysis. • Reviewed disparity study drafts, identified missing/misrepresented data, edited structure, drafted additional content.

**Mission Economic Development Agency (MEDA), San Francisco** Jan 2021 – June 2021 *Graduate Consultant*

- Collected and analyzed data on the impact of the SF eviction moratorium on low-income residents of color.
- Produced literature review, designed and implemented data analysis, final report and presentation to leadership.

**Tapp's Arts Center, Columbia, SC** (remote work) Jun 2018 – Aug 2020 *Freelance Grants Writer*

- Prepared and managed grant proposals for program developing an economically self-sustaining creative sector in Columbia.
- Ran multiple RFP processes simultaneously; won largest 2019 NEA grant in South Carolina.

**Public Defender's Office, Richland County, SC** Jul 2017 - Aug 2017 *Intern for Assistant Public Defender Constantine Pournaras*

- Copyedited drafts for motions/complaints, reviewed investigations, performed prelim research with nonprofit Appleseed.

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**DONALD J. HUGHES, P.E., PH.D.**

157 Strong Avenue 315-395-1887 (cell) Syracuse, N.Y. 13210 315-214-4060 (home)  
dhughes171@gmail.com

**EXPERIENCE**

**Hughes Environmental Consulting Services (Syracuse, N.Y.)** June 1992 - present: *Independent Consultant*

Self-employed, offering environmental consulting to government, industry, non-profit agencies and citizens. Projects have included:

- Provided technical assistance to citizen groups at the Former Marble Quarry Landfill site in Tuckahoe, NY; Onondaga Lake Superfund site in Syracuse, New York, and Kalamazoo River Superfund site in eastern Michigan,
- Technical review of industrial pretreatment study and VOC fate study in sewage treatment
- Technical review of former industrial waste site in metro-NYC area.
- Estimated contaminant losses during remediation of PCB-contaminated sediments ■  
Designed biological treatment system for contaminated sediments and prepared guidance document for remediation of contaminated sediments
- Set-up and managed data collection systems at an industrial landfill

### **LeMoyne College, Department of Chemistry**

August 2011 – present: Laboratory Coordinator (since January 2017); Adjunct Professor Coordinator of chemistry lab written materials, chemicals, and chemistry department equipment. Lecture courses taught: Environmental Chemistry (3 semesters); Energy & the Environment Laboratory Courses taught: Physical Chemistry (6 semesters), General Physics (2 semesters) and Freshman Chemistry (7 semesters)

### **Certified Environmental Services, Inc.**

May 2012 – March 2015: Assistant QA Officer; Environmental Engineer Laboratory: Performed daily QC review of data from metals lab; conducted a complete internal lab audit; revised/updated over 50 Standard Operating Procedures. Performed some bench work—sample prep, analysis, and calibration of equipment.

Engineering: Prepared environmental reports for investigations, remediation, and Phase I assessments.

### **SUNY Cortland, Department of Chemistry**

August 2010 – May 2012: Adjunct Professor

Courses taught: General Chemistry, Analytical Chemistry, and Chemistry & the Environment.

### **Onondaga Environmental Institute (Syracuse, N.Y.)**

August 2005 - January 2010: Senior Scientist

- Compiled and analyzed water quality data for the Onondaga Creek watershed, and produced a corresponding series of Fact Sheets for public and governmental use.
- Prepared a 700-page report cataloguing aquatic impairments in the Onondaga Lake watershed, based on a 37-year record of investigations of surface waters, sediments, fish tissue, macroinvertebrates, biotic communities, and habitat (co-author D. Gefell).
- Led an investigation of fish tissue contamination (metals & organics) and benthic communities in the Onondaga Lake watershed
- Led a comprehensive study of bacterial contamination in local urban waterways, focused on locating and evaluating dry-weather sources; coordinated field and laboratory work; prepared reports; and presented the study's findings to policy makers and at scientific meetings.

### **Atlantic States Legal Foundation (Syracuse, N.Y.)**

August 1990 - May 1992: Technical Writer; Staff Engineer

Prepared a citizen's guide to Lake Michigan Lakewide Management Plan. Provided technical support for negotiations and environmental projects. Reviewed documents related to the investigation and remediation of Onondaga Lake.

## **Blasland & Bouck Engineers, P.C. (Syracuse, N.Y.)**

November 1985 - June 1990: Sr. Project Engineer

Prepared plans, specifications, reports and cost estimates; supervised other personnel; performed process design, data analysis, laboratory oversight, and literature review. Past projects included RI/FS and related reports for both Superfund and non-Superfund sites, water treatment plant upgrade, industrial wastewater pre-treatment, permit development, pilot studies, groundwater treatment, and research on numerous environmental issues. Focused on sites contaminated with PCBs. Clients included many Fortune-500 companies.

## **EDUCATION**

Ph.D. in Chemistry (2005)

College of Environmental Science and Forestry, Syracuse, NY

Dissertation: An Evaluation of XAD Resins for Sampling of Trace Organic Compounds in Natural Waters. Advisor: John P. Hassett, Ph.D., Chemistry Department Chair

M.S. in Environmental Engineering (1986)

Cornell University, Ithaca, N.Y.

Thesis Title: The effect of pH on kinetics in a methanogenic acetate-enrichment culture.  
Advisor: James M. Gossett, Ph.D., Professor of Environmental Engineering

B.S. in Chemical Engineering (1981)

State University of New York at Buffalo, Buffalo, N.Y.

## **CERTIFICATION / LICENCES**

Registered Professional Engineer (064393) in New York State

## **AWARDS**

Received six graduate student awards while attending SUNY-ESF, with combined value of \$ 5,150.

## **COMMUNITY SERVICE**

1. Syracuse Track Club: Board of Directors, 2006 – present
2. Sierra Club, Atlantic Chapter: Executive Committee, 2007 - present
3. Onondaga County Resource Recovery Agency (OCRRA): Board of Directors, 2004 – 2009.
4. Syracuse Cooperative Federal Credit Union. Board of Directors, 1995 – 1998.

## **PUBLICATIONS AND PRESENTATIONS**

A complete list is available as an Appendix. It includes: 8 publications, 11 oral presentations, and 12 posters.

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**RACHEL KITCHIN**

Senior Corporate Climate Campaigner for Stand.Earth

rachel@stand.earth

**CAREER HIGHLIGHTS**

**STAND.EARTH - Senior Corporate Climate Campaigner**

May 2022-present

Lead campaigner for Stand.earth's Fashion and IT campaigns, developing research-driven and impact focused campaigns to shift the global supply chains of major fashion and IT companies off fossil fuels and catalyzing a shift towards renewable energy. Has worked with major corporations including H&M, Inditex and Apple to achieve stronger climate targets and greater accountability. Leads the research and development of major campaign publications including the *Fossil Free Fashion Scorecard*, and *Supply Change* reports; corporate engagement; media relations and campaign strategy.

**Science Based Targets Initiative (SBTi) - Scope 2 Expert Working Group member - May 2025 - present**

Part of expert working group consulting on changes to SBTi Scope 2 target setting guidelines.

**ENVIRONMENTAL DEFENCE CANADA (EDC)**

**Senior Engagement Manager**

August 2020 – May 2022

Led all strategic public campaigns and communications on EDC's fast-moving Ontario Climate and Environment programs. Acted as campaign adviser to a large network of community and grassroots organizations across the province. Responsible for execution of major organizational initiatives that promote political advocacy, increase voter turnout and encourage members to take bold action on climate.

**Communications Manager**

May 2018 – July 2019

Led the development and launch of a new national program area including developing brand, messaging, strategic direction, media relations and all public communications. Responsible for developing and maintaining the tone and message consistency of all communications across public, government and corporate relations.

**Digital Engagement Manager**

November 2017—May 2018

Developed and project managed a major social media, digital, and thought-leader engagement campaign to increase public awareness

**FRIENDS OF THE EARTH, London, UK**

**Press Officer**

February 2020 – August 2020

**GUIDE DOGS UK, London, UK**

*Guide Dogs UK is a national charity supporting blind and partially sighted people to live independently through campaigning and support services.*

**Campaigns Officer**

November 2014 —June 2017

Responsible for the planning, delivery, and evaluation of policy campaigns targeting government and corporations, and managed supporter and public engagement through email, social media and print communications.

**EDUCATION**

**School of Oriental and African Studies (SOAS), University of London, UK**

MA Pacific Asian Studies – September 2013 - September 2014

**University of Edinburgh, UK**

MA (Hons) History – September 2008 - July 2012

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**CATHERINE L LANDIS**

Science Advisor, Center for Native Peoples and the Environment

241 Illick Hall, 1 Forestry Drive

State University of New York - College of Environmental Science and Forestry (SUNY-ESF)

Syracuse, New York 13210

ph: (315) 558-8667 cell; email: cllandis@syr.edu

**EDUCATION**

Ph.D., Ecology, August 2018. Dissertation: “Heart of the Country: Historical Ecology of Onondaga Lake.”

M.S., Environmental and Forest Biology, December 2008, SUNY-ESF. Thesis: “Natural Plant Establishment along an Urban Stream, Onondaga Creek, Syracuse, NY.”

B.A., English (Honors Program), August 1981, University of Michigan, Ann Arbor.

**EMPLOYMENT**

Science Advisor, Center for Native Peoples and the Environment, SUNY ESF, Aug 2023 – present.

Post-doctoral Associate, Center for Native Peoples and the Environment, SUNY-ESF, Aug 2018- Aug 2023.

Research Associate, Center for Native Peoples and the Environment, SUNY-ESF, Jan 2017 – present, and Feb 2012 – Dec 2014.

Graduate Teaching Assistant, Urban Ecology. SUNY-ESF. August 2012 – Dec 2012.

Field Biologist, Central New York Land Trust, May – Sept 2012.

Graduate Research Assistant, Onondaga Lake Ecocultural History Project, May – Dec 2011.

Graduate Teaching Assistant, Perspectives of Interpretive Design. SUNY-ESF. January-May 2011.

Graduate Teaching Assistant, Principles of Environmental Interpretation. SUNY-ESF. August-December 2010.

National Science Foundation Graduate K-12 Teaching Fellow, SUNY-ESF. July 2008-June 2010; December 2010-May 2011.

Graduate Teaching Assistant, Flora of Central New York, and Comparative Vertebrate Anatomy. SUNY-ESF. August 2007-May 2008.

Research Assistant in field botany and ornithology, riparian zone ash (*Fraxinus*) research project, May-August 2007.

Graduate Research Assistant, Onondaga Creek urban riparian corridor project, Faculty of Environmental and Forest Biology, SUNY-ESF. May 2005 – 2007.

Meditation Instructor, Healthy Monday Meditation, Syracuse University. March 2007-March 2020.

Field Biologist, Manti-LaSal National Forest, 1991-1995.

## **PROFESSIONAL AND COMMUNITY AFFILIATIONS**

Ecological Society of America

American Society of Environmental History

New York State Flora Association

Central New York Land Trust – Member, Stewardship Committee (current); and Member, Board of Directors from 2014-2021; Member, Indigenous Lands Working Group (ILWG; statewide collaborative focused on Land Trust relationships with Native nations in NYS)

Wild Ones – Habitat Landscaping of CNY

Blomidon Naturalists Society (Wolfville, NS)

## **AWARDS**

Alumni Fellowship Award, 2008.

Edna Bailey Sussman Foundation internship grants, 2007 and 2011.

President's Award for Community Service, SUNY-ESF, December 2006.

New York Flora Association Plant Conservationist of the Year Award, 2021.

Central New York Land Trust Conservationist of the Year Award, 2021.

## **PUBLICATIONS**

McMullen, J., M. Hough, M. Young, and C. Landis. 2021. Discovery of *Spiranthes odorata* (Nutt.) Lindl. (fragrant ladies'-tresses) in Central New York. Native Orchid Conference, volume 18.2.

Landis, C.L. 2017. The ecology and history of Onondaga Lake: exploring Haudenosaunee and scientific perspectives. Curriculum for high school students based on Haudenosaunee Thanksgiving Address, developed with input from ESF and Syracuse University faculty.  
<http://sustainability.syr.edu/academics/exploring-haudenosaunee-and-scientific-perspectives/high-school-curriculum-resources/>

Landis, C. L., & Leopold, D. J. 2014. Natural plant establishment along an urban stream, Onondaga Creek, New York. *Northeastern Naturalist*, 21:303-322.

Historical ecosystems of Onondaga Lake. 2010. Fact sheet for public distribution; prepared by staff at Onondaga Environmental Institute based on my research.

Beal, R., H. Busa, G. Lim, C. Landis, C. Deary-Petrocci, D. Leopold, and K.B. Sobering. 2007. Conservation and use of native plants: supplemental curriculum materials for secondary teachers and students in science, social studies, English, and technology. SUNY-ESF Outreach.

## **PROFESSIONAL PRESENTATIONS & POSTERS**

Landis, C.L. Of canoes and canals: Indigenous river science in the Oswego River watershed. Poster for American Society of Environmental History national conference, 2022, Eugene, OR.

Landis, C. L., R.W. Kimmerer, and D.J. Leopold. 2017. Historical ecology of Onondaga Lake. Presentation at Ecological Society of America conference, Portland, OR, August 4.

Landis, C. L., R.W. Kimmerer, and D.J. Leopold. 2015. Pursh's plants of Onondaga. Presentation at New England Botanical Club conference, Smith College, Northampton, MA, June 4.

Landis, C.L., R.W. Kimmerer, and D.J. Leopold. 2014. Historical ecological of a major superfund site, Onondaga Lake, NY. Society for Ethnobiology Conference, Cherokee, NC. May 14.

Landis, C.L., R.W. Kimmerer, and D.J. Leopold. 2011. Lost and found in Onondaga: historical ecology of a polluted lake. Oral presentation at conference "Creating the Natural," Cornell University, January 20-21.

Limburg, K. and C.L. Landis. 2008. Restoring American eel (*Anguilla rostrata*) to the Onondaga Lake watershed. Poster presented at Northeast Natural History Conference, Albany, NY (was among 10 finalists selected for Best Student Poster).

Fierke, M., R. Germain, C. Landis, M. O'Brien, J. Riddle, and N. Werner. 2008. Ecological and economic impacts of emerald ash borer (*Agrilus planipennis*) and *Sirex noctilio*. 2008. Oral presentation at Graduate Invasive Species Conference, National Center for Ecological Analysis and Synthesis (NCEAS). Santa Barbara, CA, February 4-8.

## **TEACHING AND CAMPUS ACTIVITIES (AT SUNY ESF)**

### *Teaching*

EFB 202. Ecological monitoring and biodiversity assessment. Taught plant ecology section of summer field course at Cranberry Lake Biological Station, 2013 and 2015.

Edible Wild Plants, EFB 796, 1 credit. Summer session class in wild edible plant field identification, harvest, preparation and other issues and topics related to foraging. Summer 2019.

Biocultural Restoration, EFB 797, 3 credits. Graduate level class in combining biological and cultural elements for ecological restoration and land healing. Co-instructor 2020, 2022.

Native Peoples, Lands, and Cultures, EST 140, 3 credits. Undergraduate level class introducing students to Native cultures and relationship to land, with emphasis on Haudenosaunee people and lands. Co-instructor 2019-2022.

Plants of CNY. Fall 2024. Instructor for plant biology field course.

Onondaga Land Rights and Our Common Future. Spring 2025. Co-Instructor along with representatives from Onondaga Nation, graduate seminar.

### *Campus activities*

Bee Campus Committee, 2021 to present. This Committee provides input regarding campus plantings and how they relate to educational programming, ecological function, and student experience.

Botany Club. Working with graduate students, we established this club in 2019 to fill a perceived gap around field botany skills; and, to counteract the epidemic of plant blindness. Role: Co-Advisor, along with Donald Leopold.

Student advising. Informal role advising students regarding their research in the field and otherwise, often related to bio-cultural topics; steering committee member.

## **COMMUNITY SERVICE AND EDUCATION**

### *Service and education 2006:*

2006-2008. Onondaga Creek Working Group member. This group met monthly to take field outings, conduct public input meetings, and learn about various facets of Onondaga Creek biology and history in order to produce a Management Plan (June 2008, through Onondaga Environmental Institute; EPA funded project).

September 2005-June 2006. Onondaga Creek Kids, effort to introduce home-school children to basic stream ecology including water dynamics, plants, animals, human impacts. Teaching via field trips and library sessions, development of skits, etc.

April 29. Onondaga Creek interpretive walk with Rapha Community Church.

May 7. Nature poetry reading, Sterling Nature Center, Sterling, NY.

May 13. Onondaga Creek for spring resident and migrant birds. Half day field trip for Onondaga Audubon Society (mostly within city of Syracuse, demonstrating value of urban wildlife habitat).

May 20. Onondaga Creek Community Forum, Petit Branch Library. "Onondaga Creek: Ten Things You Need to Know" (power point presentation).

June 11. "Nature of the Creek" interpretive walk, co-lead with Amy Samuels of Cornell Cooperative Extension, as part of Honoring Water event at Onondaga Lake Inner Harbor.

June 27. Trees and shrubs for the landscape. Co-lead all-day field trip as part of Northeast Symposium on Native Plant Education, Conservation, Gardening, Mexico, NY.

July 11. Served as co-moderator for presentation by Joe Heath and Dr. Lawrence Hauptman, "The Onondaga Nation and the US Courts," part of the collaborative educational series, Onondaga Land Rights and our Common Future.

August 11. "Plants for the Watershed." Tour of plant research plots along Onondaga Creek, as well as demonstration rain garden at Zen Center, with Syracuse's South Side garden group.

August 29. "This is Your Watershed," display at New York State fair highlighting Onondaga Creek and SUNY-ESF's habitat restoration project.

September 10. Onondaga Creek Nature Walk for New Environment Association.

October 17. “Lost Waters of the Onondaga Valley.” Presentation for all day Teach-in event, Onondaga Lands Rights & our Common Future, SUNY-ESF.

### 2007

Spring 2007. Assisting with planning and conducting Onondaga Creek program for first graders, Ed Smith school.

April 28. Instructor for one-day Teacher’s Workshop on Onondaga Creek, held at Clary Middle School.

April 23. Invited speaker on ecospirituality panel for Women Transcending Boundaries, local inter-religious group.

Jan – May 2007. Helped plan panel discussion on Onondaga Creek for Forty Below Summit conference to be held at Oncenter on June 1, 2007. Appeared on panel and co-lead field trip also.

June 10. “Birds along the Creek.” Led half day field trip for Onondaga Audubon Society focusing on Onondaga Creek avifauna.

### 2008

June 7. “Birds of Onondaga Creek” half-day field trip for Onondaga Audubon Society.

### 2009

May 17. “Healing and Sustaining Mother Earth” presentation for Women Transcending Boundaries.

June 18 & 20. “Gulls, Flycatchers, Cuckoos and Rails: Birds of Central NY” program for Naturally New York, a naturalist training program for community members, held at SUNY-ESF. Taught indoor session and led field trip.

Onondaga Nation Youth Summer Program. Taught plant ID and other natural history; helped plan & lead canoe trip down Onondaga Creek.

August 17. Native Youth Camp, Cranberry Lake Biological Station, Adirondack Park, NYS. “The Singing Birds” and “Birdsong Jeopardy.”

### 2010

June 17 & 19. “Gulls, Flycatchers, Cuckoos and Rails: Birds of Central NY” program for Naturally New York. Indoor session and half day field trip.

August 19. Native Youth Camp, Cranberry Lake Biological Station, Adirondack Park, NYS. “The Singing Birds” and “Birdsong Jeopardy.”

Invasive Plants Workshop for state employees (DEC, DOT, others). Co-led this ½ day training at October 7. SUNY-ESF and Clark Reservation State Park.

Urban Forest Restoration Initiative. Planned agroforestry project in 2 acres of woodland along Onondaga Creek. Worked with volunteers and local native plant growers to remove invasives, and then plant 60 native trees and shrubs in this urban woodland.

### 2011

August 18. Native Youth Camp, Cranberry Lake Biological Station, Adirondack Park, NYS. “The Singing Birds” and “Birdsong Jeopardy.”

### 2018

“Historical Ecology of Onondaga Lake,” presentation at Skä•noñh Great Law of Peace Center, Oct 2018.

### 2021

“Trees of Beaver Lake Nature Center” recorded instructional walk through BLNC arboretum; presented via Facebook, due to Covid restrictions. April 22, 2021.

“Indigenous Tenure and Access: Land Justice for NY Land Trusts,” May 2021, annual meeting plenary presentation with Neil Patterson, Curtis Berkey, Alex Page, for Land Conservation Conference, NYS program meeting.

### 2022

“Becoming allies: historical ecological at the Central Fire,” presentation for Hubbard Brook Research Foundation, Jan 6, 2022.

Winter Botany workshop, Akwesasne Mohawk Nation, with Neil Patterson. Feb 21-22, 2023.

“Know Your Trees: Beaver Lake Nature Center,” April 11, 2022, Earth Week walk.

Village of Fayetteville street tree walk, as part of Manlius Green Days, April 16, 2022.

“Haudenosaunee Plantways, Past & Present,” presentation for Finger Lakes Native Plant Society, with Neil Patterson, April 19, 2022.

“From fairy slipper to death camas: secrets of the lost cedars,” historical ecology public presentation at Everson Museum of Art, Nov 17, 2022.

### 2023

“Know Your Neighbors: Onondaga Nation,” presentation for Syracuse Garden Club, Jan 23, 2023.

“Indigenous river science in the Oswego River Watershed: a historical perspective,” presentation at NY Federation of Lake Associations conference. May 4, 2023.

“Gardening for Nature,” presentation at Climate Justice Weekend, UU Church, Canton, NY, Oct 14, 2023.

“Onondaga Plants, Land, People” for Onondaga Hill Historical Society, Nov 15, 2023. With Jeanne Shenandoah from Onondaga Nation.

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### **MADLINE NYBLADE**

[madelinenyblade.com](http://madelinenyblade.com); [mlnyblad@esf.edu](mailto:mlnyblad@esf.edu); (315) 470-6887

Assistant Professor, Department of Environmental Studies

Faculty Co-Director, Center for Native Peoples and the Environment

State University of New York, College of Environmental Science and Forestry

235 Marshall Hall, 1 Forestry Drive, Syracuse NY 13210

### **EDUCATION**

2019 – 2023 Ph.D. Earth and Environmental Sciences

Graduate minor in American Indian and Indigenous Studies

The University of Minnesota – Twin Cities (UMN)

Kawe Gidaa-naanaagadawendaamin Manoomin Research Collaborative

Thesis: *Hydrologic Impacts of Climate and Land Use Change on Manoomin/Psin (Wild Rice) Ecosystems: Outcomes from a Tribal-University Research Partnership*

Focus: Tribal-university research methodologies, interdisciplinary environmental science, hydrology, ecology, limnology

Advisors: Dr. Crystal Ng and Dr. Michael Dockry

2014 – 2018 B.S. Geoscience, *summa cum laude*

The Pennsylvania State University (PSU), Schreyer Honors College

Honors in geoscience, mathematics, and community development

Thesis: *Numerical Modeling of the Hydrologic-Agricultural-Economic System in Punjab, India: An Analysis and Reflection on Interdisciplinary Modeling for Sustainability*

Advisors: Dr. Tess Russo, Dr. Kate Zipp, and Dr. Ludmil Zikatanov

## **WORK EXPERIENCE**

2024 – Assistant Professor, Department of Environmental Studies, State University of New York, College of Science and Forestry (SUNY ESF)

2024 – Co-Faculty Director, Center for Native Peoples and the Environment, SUNY ESF

2023 Interim Project Coordinator, Kawe Gidaa-naanaagadawendaamin Manoomin Research Collaborative, UMN

2022 – 2023 Hydrogeology Field Course Teaching Assistant, Department of Earth and Environmental Sciences, UMN

2019 – 2023 Research Assistant, Department of Earth and Environmental Sciences, UMN

2019 Out-camping Program Coordinator for summer camp programs at Merrowvista, New Hampshire

2018 – 2019 Youth Facilitation and Outdoor Education Specialist for community and school programs at Merrowvista, New Hampshire

2016 – 2018 Computational Math, Hydrology, and Economic Research Assistant at PSU for T. Russo, K. Zipp, L. Zikatanov

2016 Research Assistant in the Human Environmental Dynamics Lab at PSU for R. Bird and D. Bird

2014 – 2018 Summer Camp Counselor and Trip Leader, Merrowvista, New Hampshire

## PUBLICATIONS

### Peer Reviewed Papers

**Nyblade, M.**, Larkin, D. J., Vogt, D., Croll, R., Ng, G.-H. C., Graveen, W. J., Hanson, K., Panci, H., Byrne, B., & Panek, B. M. (2025). Climate change contributes to the decline in off-reservation tribal harvest availability in the Great Lakes region. *Communications Earth & Environment*, 6(1), 288. <https://doi.org/10.1038/s43247-025-02233-0>

Leonard, K., C. Avery, J. Manitowabi, **M. Nyblade**, N. D. Smiles, T.R. Hedman, S. Smith, C. Toulouse. D. David-Chavez. (2025). Water Justice. *The Status of Tribes and Climate Change*. Volume 2. Institute for Tribal Environmental Professionals.

Panek, B., K. James, N. M. Montano, J. Graveen, **M. Nyblade**. (2025). Indigenous Ways of Not Knowing. *The Status of Tribes and Climate Change*. Volume 2. Institute for Tribal Environmental Professionals.

**Nyblade, M. L.**, Smith, S. J., & Sumida Huaman, E. (2024). “The heavy burden”: Indigenous knowledge systems, biocultural diversity, and transknowledging in sciences education. *Cultural Studies of Science Education*, 19(4), 779–792. <https://doi.org/10.1007/s11422-024-10236-0>

**Nyblade, M.**, Graveen, W., Montano, M., Panek, B., & King, H. J. (2023). Tribal-University Partnership Methodology for Re-researching with Manoomin/Psiñ (Ojibwe/Dakota for Wild Rice). In E. Sumida Huaman & N. Martin (Eds.), *Indigenous research design: Transnational perspectives in practice*. Canadian Scholars and Women’s Press.

**Nyblade, M.**, & McDonald, J. (2021). Recognizing Geology’s Colonial History for Better Policy Today. *Eos 102*. <https://doi.org/https://doi.org/10.1029/2021EO162069>

Matson, L., Ng, G.-H. C., Dockry, **M., Nyblade**, M., King, H. J., Bellcourt, M., Bloomquist, J., Bunting, P., Chapman, E., Dalbotten, D., Davenport, M., Diver, K., Duquain, M., Graveen, W., Hagsten, K., Hedin, K., Howard, S., Howes, T., Johnson Sr, J., Kesner, S., Kojola, E., LaBine, R., Larkin, D., Montano, M., Moore, S., Myrbo, A., Northbird, M., Porter, M., Robinson, R., Santelli, C., Schmitter, R., Shimek, R., Schuldt, N., Smart, A., Strong, D., Torgeson, J., Vogt, D. J., Waheed, A. (2021). Transforming research and relationships through collaborative tribal-university partnerships on Manoomin (wild rice). *Environmental Science and Policy*. <https://doi.org/10.1016/j.envsci.2020.10.010>

### ***In Press***

Panek, B., **M. Nyblade**, M. Montano, C. Reed VanDam. (in press). Plants and Partners: Honoring the Personhood of Manoomin in Research, Restoration, and Education. *AlterNative*.

### ***In Review***

**Nyblade, M.**, Kayira, J., Artelle, K., Patterson, N., (invited, in review) Teaching an Ethic of Good Relationships within Environmental Science. *Indigenous Knowledge and Marine Conservation: Towards an Ethic of Good SeaRelations*

Ng, C., **Nyblade, M.**, King, H., Dockry, M., Davenport M., et al. (in review). Journey to First Consider Manoomin/Psiŋ: A Medicine Wheel Framework for Forming a Tribal-University Collaboration Around Wild Rice. *Community Science*.

### **Non-peer Reviewed Papers and Reports**

**Nyblade, M.** (2025). Potential Impacts of the Gypsum Mine on STAMP. Technical Review Memorandum for the Tonawanda Seneca Nation.

**Nyblade, M.** (2025). STAMP and Associated Development Hydrologic Impacts to Wetlands and Streams. Technical Review Memorandum for the Tonawanda Seneca Nation.

**Nyblade, M.** (2025). Batavia Wastewater Treatment Plant. Technical Review for the Tonawanda Seneca Nation

**Nyblade, M., Glover, M.,** (2025). Flooding Impacts of the STAMP development. Technical Review Memorandum for the Tonawanda Seneca Nation.

**Nyblade, M., Glover, M.,** (2025). 1000 Acres Stream Research Spring 2025 Update. Report for the Onondaga nation.

**Nyblade, M.** (2024). Wild Rice, Climate, and Land Cover Report in the 1854 Ceded Territory. Technical Report for the 1854 Treaty Authority.

**Nyblade, M.** (2024). Wild Rice, Climate, and Land Cover Report for the 1837 and 1842 Ceded Territory. Technical Report for the Great Lakes Indian Fish and Wildlife Commission.

**Nyblade, M.** (2024). Wild Rice, Climate, and Land Cover Report for the Fond du Lac Band of Lake Superior Chippewa Reservation. Technical Report for the Fond du Lac Band of Lake Superior Chippewa.

**Nyblade, M.** (2023). Geologic Mapping at the University of Minnesota. In *Towards Recognition and University-Tribal Healing Report*. University of Minnesota.

**Nyblade, M.** (2023). Indigenous Knowledge: Kawe Gidaa-naanaagadawendaamin Manoomin Case Study. In *Clean Water Act Section 106 Tribal Guidance* (p. 44). EPA.  
<https://www.epa.gov/water-pollution-control-section-106-grants/clean-water-act-section-106-tribal-guidance>

Jones, J., **Nyblade, M.**, & Cantner, K. (2022). Reflections from a relationship building community-university summit. *Community Science Exchange*.  
[https://communityscienceexchange.org/-/media/Files/CommunityScience/LocalStudy/Minnneapolis\\_Community\\_University\\_Relationship\\_Building\\_Summit.pdf](https://communityscienceexchange.org/-/media/Files/CommunityScience/LocalStudy/Minnneapolis_Community_University_Relationship_Building_Summit.pdf)

**Nyblade, M.**, Sayers, J., Voss, P., Hassenruck-Gudipati, H., Ng, G. H. C., Podany, N., White, D., Cottrell, A., Lapin, C., Green, E., David, P., Montano, M., Santelli, C. M., & Larkin, D. (2022). *Spur Lake Report (2018 - 2021)*. Kawe Gidaa-naanaagadawendaamin Manoomin.

**Nyblade, M.**, Sayers, J., Voss, P., Ng, G.-H. C., Hedin, K., Schuldt, N., Weske, C., Waheed, A., Santelli, C. M., Larkin, D. J., & Green, E. (2022). *Perch Lake Report (2018 - 2021)* Kawe Gidaa-naanaagadawendaamin Manoomin.

**Nyblade, M.**, Sayers, J., Voss, P., Ng, G. H. C., Weiss, C., Bunting, P., Moilanen, T., Waheed, A., Santelli, C. M., Larkin, D. J., & Green, E. (2022). *Ogechie and Swamp Lakes Report (2018 - 2021)* Kawe Gidaa-naanaagadawendaamin Manoomin.

**Nyblade, M.**, Sayers, J., Ng, G.-H. C., Bloomquist, J., Sangetay, C., Waheed, A., Torres, S., Dance, S., Santelli, C. M., Larkin, D. J., & Green, E. (2022). *Clam, Long, and Big Round Lakes Report (2018 - 2021)* Kawe Gidaa-naanaagadawendaamin Manoomin.

**Nyblade, M.**, Sayers, J., Santelli, C., Runzheimer, R., Ng, G. H. C., Vogt, D., Chun, C. L., Duhn, K., Thompson, M., Waheed, A., Dance, S., Voss, P., Hassenruck-Gudipati, H., Larkin, D. J., & Green, E. (2022). *Big Rice Lake Report (2018 - 2021)* Kawe Gidaa-naanaagadawendaamin Manoomin.

**Nyblade, M.**, Sayers, J., Voss, P., Torres, S., Hassenruck-Gudipati, H., Runzheimer, R., Ng, G. H. C., Graveen, J., De Vries, J., Virden, A., Allen, D., Hanson, K., Waheed, A., Santelli, C. M., Larkin, D. J., & Green, E. (2022). *Lac du Flambeau River Report (2018 - 2021)* Kawe Gidaa-naanaagadawendaamin Manoomin.

**Nyblade, M.**, Sayers, J., Dance, S., Voss, P., Torres, S., Ng, G. H. C., Waheed, A., Santelli, C. M., Larkin, D. J., & Green, E. (2021). *Site Comparison Report (2018 - 2020)* Kawe Gidaa-naanaagadawendaamin Manoomin.

**Nyblade, M.** (2020, April 16) Finding my place in the community science movement. *Thriving Earth Exchange Blog*.  
<https://thrivingearthexchange.org/finding-my-place-in-the-community-science-movement/>

**Nyblade, M.** (2018, April 29). Penn State values take a hike. Op Ed. *Washington Examiner*.

### **News and media about my work**

Rogers, A. (2025). 'As vulnerable as a plant can be': New study finds climate change largely to blame for less wild rice. Wisconsin Public Radio.

Deelen, G. (2023). *Climate Change Threatens the Future of Wild Rice.* Eos.

Looby, C., Vaisvilas, F. (2023). *Great Lakes tribes teach 'water is life.' But they're forced to fight for its protection.* Milwaukee Journal Sentinel. Republished in USA Today.

Rieger-Borer, B., Nace, A. (2023). *State of Water: Protecting and understanding wild rice, sacred to Ojibwe people.* CBS News Minnesota.

Denzin, N. (2023). *Wisconsin's wild rice harvest and threats of climate change.* PBS Wisconsin.

Hazard, A. (2023). *Survival of wild rice threatened by climate change, increased rainfall in northern Minnesota.* Sahan Journal. Republished in MPR News.

Averett, N. (2023). *For Decades, the Ojibwe Tribe Shunned Scientists—Until Their Partnership Became Vital.* The Nation.

## GRANTS

- 2025 – 2027 **M. Nyblade, M. Cavo.** *An Innovative Payment for Ecosystem Services Feasibility Study for Returning Indigenous Care and Access to Private Lands in New York's Northern Forests.* McIntire Stennis. USDA. (\$96,509)
- 2025 – 2026 **M. Nyblade.** 2025-2026. *Onondaga Land Return Conservation Project. The Climate Resilience Grant Program.* The Nature Conservancy. (\$49,784)
- 2024 – 2027 R.W. Kimmerer, **M. Nyblade.** S. Diemont, N. Paterson, C. Beier. *Development of an Indigenous-led Research Agenda for Restoration and Stewardship of Culturally Significant Plants for Climate Change Adaptation in the Northeast.* Northeast Climate Adaptation Science Center. USGS. (\$500,000)
- 2023 – 2027 N. Patterson., **M. Nyblade,** K. Artelle. *NYSDEC Cross-Cultural Program.* New York State Department of Environmental Conservation. (\$1,142,000 per year)
- 2023 **M. Nyblade,** UMN Doctoral Dissertation Fellowship (\$35,000 plus tuition)
- 2023 **M. Nyblade,** G-H. Ng., Mini Grant, Institute on the Environment, University of Minnesota (\$3000)
- 2023 **M. Nyblade,** American Geophysical Union travel grant for AAAS Catalyzing Advocacy in Science and Engineering Workshop (\$2,000)
- 2022 **M. Nyblade,** American Geophysical Union travel grant for the Second National Conference for Justice in the Geosciences (\$2,000)
- 2022 **M. Nyblade,** J. Jones, Mini Grant, Institute on the Environment, University of Minnesota (\$3,000)
- 2022 **M. Nyblade,** J. Jones, Community Partnerships Grant, Clinical and Translational Science Institute, UMN (\$5,000)
- 2021 **M. Nyblade,** Land-Grab/Land-Grant Short-Term Fellowship, Institute on Advanced Studies, UMN (\$2,000)
- 2021 **M. Nyblade,** J. Jones, Sawkins Outreach Grant, UMN Department of Earth and Environmental Sciences (\$7,500)
- 2020 **M. Nyblade,** Travel grant for Graduate Leaders in Interdisciplinary Research, National Socio-Environmental Synthesis Center (\$2,000)
- 2019 – 2022 **M. Nyblade,** UMN College of Science and Engineering Three-Year Graduate Fellowship (\$35,000 per year plus tuition)

2017                    **M. Nyblade**, Erickson Discovery Grant for undergraduate summer research, PSU (\$3,500)

**PRESENTATIONS** (presenters underlined)

**Invited Talks**

Nyblade, M. *First We Must Consider Manoomin/Psin: Impacts of Climate and Land Cover Change on Wild Rice*. Lunch with Friends. Friends of the Boundary Waters. Virtual Presentation. (Invited) August 8, 2024.

Nyblade, M. *First We Must Consider Manoomin/Psin: Impacts of Climate and Land Cover Change on Wild Rice*. Water Seminar. SUNY ESF. 2025. Presentation. (Invited)

Nyblade, M. *Water Intensive Industries*. Freshwater Futures. 2025. Presentation (Invited)

Nyblade, M., J. Graveen, B. Panek, G. Voss, A. Gregg, C. Ng, Plenary: *First We Must Consider Manoomin/Psin: A Conversation on Tribal-University Collaborative Research around Wild Rice*. AGU and CUAHSI Water Science Conference. June 24, 2024

Nyblade, M. *First We Must Consider Manoomin/Psin: Impacts of Climate and Land Cover Change on Wild Rice*. HydroReads Seminar. Syracuse University. March 27, 2024

Nyblade, M. *Geoscience, Colonialism, and Just Ways Forward: A Minnesota Case-Study*. Central New York Association of Professional Geologists Monthly Lecture. May 1, 2024

- Nyblade, M., Graveen, W., Croll, R., Krumwiede, B., (2023). *Climate Change Impacts on Wild Rice Panel Discussion*. Wild Rice Conference, Fond du Lac Reservation.
- Panek, B., Reed-VanDam, C., Dorr, S., Nyblade, M. (2023). *A holistic framework for Manoomin research, restoration, and learning*. Wild Rice Conference, Fond du Lac Reservation.
- Sumida-Huaman, E., Panek, B., Nyblade, M. et al. (2023). *Indigenous Research Design Book Launch Panel Discussion*. The Center for Race, Indigeneity, Disability, Gender, and Sexuality Studies. University of Minnesota – Twin Cities. Minneapolis, MN.
- Nyblade, M. (2023). *Climate and Land-Use Change Impacts on Wild Rice*. Tribal Pesticide Program. Virtual.
- Nyblade, M. (2023). *First, we must consider Manoomin/Psiñ : Stories and Science from a Tribal-University Research Collaboration Studying Wild Rice*. Water Issues Talk. Minnesota Pollution Control Agency. St. Paul, Minnesota. Virtual.
- Nyblade, M. (2023). *Climate and Land-Use Change Impacts on Wild Rice*. Wild Rice Research Roundtable, St. Paul, Minnesota.
- Dorr, S., Panek, B., Reed-VanDam, C., Nyblade, M. (2023). *A holistic framework for Manoomin research, restoration, and learning*. Wild Rice Research Roundtable, St. Paul, Minnesota.
- Nyblade, M. (2023). *Wild Rice Health, Restoration, and Collaborative Research*. Ramsey County Cooperative Weed Management Area Meeting. Ramsey County Soil and Water Conservation Division. Shoreview, Minnesota.
- Nyblade, M. (2023). *Incorporating Indigenous Knowledge to Target Tribal Nonpoint Source Work*. EPA. Virtual.
- Nyblade, M., Watkins, M., Runkle, T. (2023). *Geologic Mapping and Indigenous Land Dispossession in present-day Minnesota*. USGS Geoheritage Mapping Workshop. Virtual.
- Nyblade, M., Graveen, W., Montano, M., Panek, B., & King, H. J. (2022). *Bringing the Spirit Back to Science: A Tribal-University Methodology for Re-search Co-Production, Healing, and Justice with Psiñ/Manoomin (Wild Rice)*. Tribal Water Workshop. Prairie Island Indian Community.
- Nyblade, M. (2022). *A Conversation on Tribal-University Research Collaboration*. Stories from the Field Series. Center for Economic and Community Development. Penn State. Virtual.

Nyblade, M. (2022). *First, We Must Consider Manoomin/Psij: Stories and Science from a Tribal-University Research Collaboration Studying Wild Rice*. Earth and Environmental Sciences Department Seminar, University of Minnesota – Duluth.

Nyblade, M., Green, D., Vogt, D., Schuldt, N., & Graveen, W. (2021). *Kawe Gidaa-naanaagadawendaamin Manoomin: First we must consider Manoomin/Psin*. Natural Resource Research Institute Seminar. University of Minnesota – Duluth. Virtual.

### Conference Oral Presentations

Nyblade, M., McClure, G., Vogt, D., Croll, R., Byrne, B., Panek, B., Larkin, D., Ng, G. H. C., (2023). *First, we must consider Manoomin/Psij: Impacts of Climate and Land Cover Change on Wild Rice*. American Geophysical Union Fall Meeting.

Nyblade, M., McClure, G., Schuldt, N., Vogt, D., Croll, R., Larkin, D. J., & Ng, G. H. C. (2023). *Land Use and Climate Change Impacts on Manoomin (Psij, wild rice, Zizania palustris) across the Upper Great Lakes Region*. St. Louis River Summit.

Nyblade, M., Ng, G. H. C., Runkel, A. C., McDonald, J., Francis, S., & Hassenruck-Gudipati, H. (2022). *Geologic Mapping and Indigenous Land Dispossession in present-day Minnesota*. American Geophysical Union Fall Meeting.

Panek, B., Nyblade, M., & Montano, M. (2022). *Manoomin Medicine Wheel Model: An Indigenous Framework for Holistic, Respectful Earth Science Research*. American Geophysical Union Fall Meeting.

Nyblade, M., Graveen, W., Montano, M., Panek, B., & King, H. J. (2022). *Bringing the Spirit Back to Science: A Tribal-University Methodology for Re-search Co-Production, Healing, and Justice with Manoomin/Psij (Wild Rice)*. American Geophysical Union Fall Meeting.

Nyblade, M., Vogt, D., Hedin, K., Weske, C., Schuldt, N., Larkin, D., & Ng, G.-H. C. (2022). *Wild Rice Relationships with Climate: Results from a Multi-decadal, Statistical Analysis of 56 Rice Waters across the Upper Great Lakes Region*. North American Lakes Management Society.

Nyblade, M., Hedin, K., Weske, C., Schuldt, N., Vogt, D., Larkin, D., & Ng, C. (2022). *Multi-decadal climate and lake-level relationships with Manoomin (Psin, wild rice, Zizania palustris) in the Upper Great Lakes region*. St Louis River Summit.

Davenport, M. A., King, H. J., LaBine, R., Nyblade, M., & Vogt, D. (2021). *A deliberative science framework for evaluating community-engaged research*. International Association for Society and Natural Resources 2021 Virtual Conference.  
<https://www.youtube.com/watch?v=PMs-Z8rhjzk&t=3s>

Nyblade, M., Schuldt, N., Sayers, J., Hedin, K., Dockry, M., Vogt, D. J., Ng, G.-H. C., Graveen, W., Davenport, M. A., Duquain, M., & King, H. J. (2021). *Transforming research and relationships through collaborative tribal-university partnerships on Manoomin (wild rice)*. North American Lake Management Society National Monitoring Conference.  
<https://www.youtube.com/watch?v=AZd6CN5C2d0> (30 min version)  
<https://www.youtube.com/watch?v=PDUaQmvOw8o> (10 min version)

Nyblade, M., Waheed, A., Ng, C., Santelli, C., Chapman, E., Graveen, J., Hedin, K., Bloomquist, J., Weiss, C., Bunting, P., Vogt, D., Dockry, M., Larkin, D., Davenport, M., Matson, L., Dalbotten, D., Duqain, M., King, H. J., Torgeson, J., ... White, L. (2020). *First We Should Consider Manoomin (Wild Rice): Co-Producing Interdisciplinary Ecological Knowledge and Co-Protecting Indigenous Resource Sovereignty*. North-Central GSA Virtual Meeting.  
<https://www.youtube.com/watch?v=FUJh9dEQ0fk>

Nyblade, M. (2017). *A Fight for Clean Water: Acid Mine Drainage in the Beech Creek Watershed*. Presented at the Rural Studies Student Conference, Penn State.

Nyblade, M. (2015). *Biodiversity Characterization of UWICE Research Preserve*. Presented at the School for Field Studies Conference, Thimphu, Bhutan.

### **Conference Poster Presentations**

Nyblade, M., Landis, C. Impacts and Insights from 200+ Years of Wetlandscape Change in the Northeast and Great Lake Region. American Geophysical Union. 2024.

Nyblade M., Landis, C. *Wild Rice Recovery Pilot Survey*. Great Lakes Coastal Symposium. 2024.

Gracelyn, M., Nyblade, M., Larkin, D. J., Ng, G. H. C., & Croll, R. (2022). *Statistical Analysis of the Combined Effects of Land Use Change and Climate Change on Manoomin/Psiñ (Wild Rice) Abundance in the Upper Great Lakes Region*. American Geophysical Union Fall Meeting.

Jones, J., Nyblade, M., & Cantner, K. (2022). “It was a rare opportunity to pick the professor’s brain:” *Relationship building as the foundation for community-university partnerships at the University of Minnesota*. American Geophysical Union Fall Meeting.

Nyblade, M., Hedin, K., Weske, C., Schuldt, N., Vogt, D., Larkin, D., & Ng, C. (2021). *Multi-decadal climate, lake-level, and water chemistry relationships with Manoomin (Psiñ, wild rice, Zizania palustris) in the Upper Great Lakes region*. American Geophysical Union Fall Meeting.

Nyblade, M., King, H., Aiona, M., Bellcourt, M., Bloomquist, J., Bunting, P., Chapman, E., Colvin, J., Dalbotten, D., Davenport, M., Diver, K., Dockry, M., Duquain, M., Graveen, W., Hagsten, K., Hedin, K., Howard, S., Howes, T., Johnson, J., ... Waheed, A. (2020). *First we must consider Manoomin (Psiñ, wild rice, Zizania palustris): Emergent understandings of meaningful research and relationships in tribal-university partnership centering Manoomin*. American Geophysical Union Fall Meeting.

Tran, T., Nyblade, M., & Ng, G.-H. C. (2020). *Importance of Manoomin (Psiñ, wild rice, Zizania palustris) to the Culture, Diet, and Health of the Anishinabeg*. American Geophysical Union Fall Meeting.

Tallas, N., Torres, S., Nyblade, M., Ng, G.-H. C., & Vogt, D. J. (2020). *Big Rice Lake and the challenges of restoring Manoomin (wild rice)*. American Geophysical Union Fall Meeting.

Ng, G.-H. C., Nyblade, M., Bellcourt, M., Bloomquist, J., Bunting, P., Caldwell, T., Charwood, L., Chapman, E., Colvin, J., Dalbotten, D., Davenport, M., Dockry, M., Diver, K., Duquain, M., Duever, D., Graveen, J., Hedin, K., Howard, S., Howes, R., ... White, L. (2019). *Decentering Western Science through Collaborative Tribal-University Research on Manoomin / Psiñ / Manōmaeh (Wild Rice)*. American Geophysical Union Fall Meeting.

Nyblade M., Russo T., Zikatanov L., & Zipp K. (2017). *Numerical Modeling of the Agricultural-Hydrologic System in Punjab, India*. American Geophysical Union Fall Meeting.

### **Co-Organized Workshops and Conference Sessions**

Summit for Building Twin Cities Community-University Relationships for Environmental Research, University of Minnesota – Twin Cities Department of Earth and Environmental Sciences (2021, 2023)

Earth Science Policy for Respecting Tribal Sovereignty, University of Minnesota Undergraduate Geoscience Club (2022)

Earth Science Policy for Respecting Tribal Sovereignty, Geoscience Alliance Conference. University of Minnesota – Twin Cities. (2022)

Cultivating Leadership for Change in the Geosciences: Effective Student Activism in the Earth Sciences, American Meteorological Society Conference (2021)

Convergence, Collaboration, Justice, and the Future of Geoscience, American Geophysical Union Fall Meeting (2020)

### **TEACHING EXPERIENCE**

2024 – Lead Instructor for *Community Based Participatory Research Methods*, Graduate Course, SUNY ESF

2024 – Lead Instructor for *Introduction to Native Peoples, Lands, and Cultures*, Undergraduate Course, SUNY ESF

2024 – Lead Instructor for *Sloan Indigenous Scholars Seminar*, Graduate Course, SUNY ESF

- 2022, 2023 Teaching Assistant for Hydrogeology Advanced Field Course, UMN
- 2022 Guest Lecturer, *An Environmental History of Water in Northern Minnesota* for the Parks and Protected Areas Management Field Course, UMN
- 2022 Guest Lecturer, *Water Quality and Wild Rice Monitoring* for the Parks and Protected Areas Management Field Course, UMN
- 2022 Backcountry Guide and Educator, 2-night Boundary Waters canoe trip for the Parks and Protected Areas Management Field Course, UMN
- 2022 Guest Lecturer, *Stories and Science from a Tribal-University Research Collaboration Studying Wild Rice* for undergraduate introductory geology (University of Minnesota – Morris) and high-school biology (Pequot Lakes High School, Minnesota)
- 2020 – 2022 Guest Lecturer, *Critical History of Geologic Mapping in Minnesota* for UMN undergraduate courses: History of Earth and Environmental Science; Environmental Justice in the Earth Sciences; Standards and Practices for Professional Geosciences; Manoomin and It’s Environment Seminar; Hydrogeology Field Course
- 2018 – 2019 Youth Facilitator, Outdoor Educator, and Program Coordinator for multi-day, overnight programs at Merrowvista with elementary through college students

## STUDENT ADVISEES

- 2024 – Mia Glover (SUNY ESF, PhD, Environmental Biology, Sloan Indigenous Scholar)
- 2024 – Nevaeh Marshall (SUNY ESF, MS, Environmental Science, Sloan Indigenous Scholar)
- 2024 – Abigail Guinan (SUNY ESF, MS, Environmental Science)
- 2024 – Aaron Hagman (SUNY ESF, MS, Environmental Biology, Sloan Indigenous Scholar)
- 2024 – Jade Huamann (SUNY ESF, MS, Environmental Science, Sloan Indigenous Scholar)
- 2022 – 2023 Gracelyn McClure (undergraduate research, UMN)
- 2022 Bazile Panek (undergraduate research, Northern Michigan University)
- 2022 Payton Kittaka and Ashley Murr (graduate seminar research project, University of Minnesota – Duluth)

- 2021 Ananya Vegesna and Lauren Shipman (undergraduate research, UMN)
- 2020 Nizhoni Tallas, Sirena Torres, Tyler Tran, Mōhala Aiona, and Jamie Colvin (Research Experience for Undergraduates, UMN)

**HONORS AND AWARDS**

- 2023 Deb Swackhamer Award, Minnesota Water Resources Conference Committee
- 2023 UMN Outstanding Community Service Award
- 2023 President’s Student Leadership Award, Iowa & Minnesota Campus Compact
- 2021 President’s Student Leadership and Service Award, UMN
- 2020 Honorable Mention, NSF Graduate Research Fellowship Program
- 2020 Honorable Mention of Student Presentation, North Central Geological Society of America
- 2018 Earth and Mineral Sciences College Science Honor Marshal (given to the science student with the highest GPA in the College of Earth and Mineral Sciences graduating class), PSU
- 2018 Dean Edward Steidle Memorial Scholar Award, PSU
- 2018 Earth and Mineral Sciences Academy for Global Experience Laureate, PSU
- 2017 Sustainability Tree Award for outstanding sustainability leadership, PSU
- 2017 Best Student Poster Award, MODFLOW and More Conference, Golden, Colorado

**WORKSHOPS/PROGRAMS ATTENDED**

**Invited or Selected to Attend**

- 2023 Michigan State University Summer Intensive on Community Engaged Scholarship

- 2023 AAAS Catalyzing Advocacy in Science and Engineering Workshop, Washington, D.C.
- 2022 Second National Conference for Justice in the Geosciences, American Geophysical Union, Washington, D.C.
- 2021 Land-Grab/Land-Grant University Short Term Fellowship Cohort Experience, UMN
- 2020 Graduate Leaders in Interdisciplinary Research, National Socio-Environmental Synthesis Center, Annapolis, Maryland
- 2019 Thriving Earth Exchange Fellows Training, American Geophysical Union, Washington, D.C.

**Workshops Open to All**

- 2019 – 2023 American Indian and Indigenous Studies Writing Workshop, UMN
- 2021 Participatory Modeling Field School, Michigan State University

**SERVICE ROLES**

- 2024 – Department of Environmental Studies’ Undergraduate Education Committee (member).
- 2024 – Center for Native Peoples and the Environment Leadership Committee (Faculty Co-Director)
- 2024 – Center for Native Peoples and the Environment Curriculum Committee (Chair)
- 2024 – Center for Native Peoples and the Environment Research Committee (Member)
- 2024 – Native Peoples and the Environment Undergraduate Minor (Faculty Coordinator)
- 2022 Co-author of a Lab Group Worksheet for Confronting Colonization in Research, UMN
- 2020 – 2023 Diversity, Equity, and Inclusion Committee Member, Department of Earth and Environmental Sciences, UMN
- 2021 – 2023 Community Engagement Seminar Series Co-organizer, Department of Earth and Environmental Sciences, UMN

- 2021 – 2023 Confronting Colonization Working-Group Member, Department of Earth and Environmental Sciences, UMN
- 2021 Rematriation and Intake Procedures for Earth and Environmental Sciences Department Rock Collections Co-Author, UMN
- 2021 Indigenous Science Seminar Organizer, UMN
- 2020 – 2021 Justice, Equity, Diversity, and Inclusion Seminars Creator and Co-Coordinator, Department of Earth and Environmental Sciences, UMN
- 2020 Earth and Environmental Sciences Department Climate Survey Qualitative Analysis and Presentation, UMN
- 2016 – 2018 President of Eco Action, PSU Environmental Advocacy Club

**GRADUATE COURSEWORK**

- 2021 Teaching in Higher Education
- 2021 Indigenous Qualitative Research Methodologies
- 2021 Community Based Participatory Research
- 2021 Forest Hydrology and Watershed Biogeochemistry
- 2021 Economic Geology
- 2020 Traditional Ecological Knowledge and Western Natural Resource Management
- 2020 Limnology
- 2020 Biometeorology
- 2020 Indigenous Education
- 2020 Indigenous Environmental Knowledge Independent Study with Dr. Michael Dockry
- 2020 Aqueous Geochemistry
- 2020 Cultural Awareness and Knowledge
- 2020 Critical Indigenous Theory
- 2019 Ways of Thinking About Health

2019 Geo Time Series  
2019 Hydrologic Modeling  
2019 Indian Law

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**LENNY SIEGEL**

August, 2025

**EDUCATION:** Valedictorian, Culver City High School, Culver City, California, 1966  
Stanford University (Physics), 1966-1969

**EMPLOYMENT:** Pacific Studies Center, Mountain View, President, 1970-present  
Center for Public Environmental Oversight (CPEO),  
Executive Director, July, 1994-present

**ELECTIVE OFFICE:** Mountain View (California) City Council, January 2015- January 2019, Mayor  
January 2018-January 2019

**TEACHING EXPERIENCE:** UCLA Department of Urban  
Planning, Guest Professor, Spring, 1995 and Winter, 1997  
UC Berkeley Extension, Guest Lecturer, “Strategies for Site Remediation: A  
Case Studies Approach,” Winter, 1995, 1996, and 1997; Fall, 1998  
Council of Energy Resource Tribes, Guest Lecturer, “Mitigation of  
Environmental Impacts to Indian Lands due to Department of Defense  
Activities,” Summer, 1994 and 1995

**AWARDS:**

ITRC Stakeholder of the Year Award, 2018

U.S. Environmental Protection Agency, National Citizen’s Excellence in (Superfund) Community  
Involvement Award, 2011

U.S. Environmental Protection Agency, Region 9, Environmental Achievement Award, November, 2001

**SAMPLE PUBLICATIONS:**

“A Stakeholder’s Guide to Long-Term Management at Vapor Intrusion Sites,” April, 2015; “A Stakeholder’s Guide to Vapor Intrusion: Update,” November, 2015; “When the Going Gets Tough, Communities Believe It’s Time to Optimize and Adapt,” *Remediation Journal*, Summer, 2014; “Jordan Downs Redevelopment, South Central Los Angeles: Vapor Intrusion Should Not be Ignored,” October, 2013; “Harlem: Learning About Vapor Exposures the Hard Way and Doing Something about It,” August, 2012; “Minding the End: A Proposal for Long-Term Management,” June, 2012; “Partnering with Communities for Biosafety’s Sake,” *Anthology of Biosafety XII*, 2011; “Long-Term Environmental Management at School and Daycare Sites,” December 2010; “The Sun Shines on the Department of Defense,” April 2010; “A Stakeholder’s Guide to Vapor Intrusion,” November, 2009; “Independent Review of the Cleanup Plan for the East 115th Street Manufactured Gas Plant Site, New York, New York,” June 2009. *Stakeholders’ Guide to Munitions Response* (Spring, 2004); *Stakeholders’ Guide to Federal Facilities Cleanup* (Summer, 1997).

**Committees (underlined are current):**

Air Combat Command Project on Streamlined Oversight, External Review Group

ASTM/ISR Brownfields Steering Committee

California Base Closure Environmental Advisory Group

California Brownfields Reuse Advisory Group

California CLEAN Loan Committee

California Site Mitigation Update advisory group

California Superfund Working Group

Clean Sites Independent Review of Program Performance, Defense Environmental Restoration Program,  
Blue Ribbon Review Panel

Community Environmental Health Assessment Project Steering Committee, National Association of City  
and County Health Officials

Compliance Assistance Advisory Committee (U.S. EPA)

Defense Science Board Task Force on Unexploded Ordnance Clearance Operations

Department of Toxic Substances Control (California) External Advisory Group

Federal Facilities Environmental Restoration Dialogue Committee

Interstate Technology & Regulatory Council 1,4 Dioxane Team

Interstate Technology & Regulatory Council Geophysical Classification for Munitions Response Team

Interstate Technology & Regulatory Council Perchlorate Work Team

Interstate Technology & Regulatory Council Permeable Reactive Barrier Work Team

Interstate Technology & Regulatory Council PFAS Team

Interstate Technology & Regulatory Council Pump & Treat Optimization Team

Interstate Technology & Regulatory Council Remedial Management of Complex Sites

Interstate Technology & Regulatory Council Vapor Intrusion Mitigation Training Work Team

Interstate Technology & Regulatory Council Vapor Intrusion Work Team

Interstate Technology & Regulatory Council Vapor Intrusion (VI) Pathway Evaluation and Mitigation

Moffett Naval Air Station Restoration Advisory Board

Mountain View (City of) Environmental Planning Commission

**National Environmental Justice Advisory Council Subcommittee on Waste and Facility Siting**

**National Environmental Justice Advisory Council Federal Facilities Working Group**

National Policy Dialogue on Military Munitions

National Research Council Committee on ACWA Secondary Wastes

**National Research Council Committee on Army Non-Stockpile Chemical Demilitarization Program  
(three iterations)**

National Research Council Committee on Environmental Remediation at Naval Facilities (two iterations)

National Research Council Committee on the Future Options for Management in the Nation's Subsurface Remediation Effort

National Research Council Committee to Review and Assess Closure Plans for the Tooele Chemical Agent Disposal Facility and Chemical Agent and Munitions Disposal System

National Research Council Committee to Review the Health and Safety Risks of High Containment Laboratories at Fort Detrick

National Research Council Committee to Review Risk Assessment Approaches for the Medical Countermeasures Test and Evaluation Facility at Fort Detrick, MD

National Research Council Committee to Review the IRIS Process

National Research Council Committee to Review the Toxicologic Effects from Past Exposure to Environmental Contaminants at the U.S. Army's Fort Detrick

Northeast Mountain View Advisory Council (Board member)

Peer Review Panel for the VOC Historical Case Initiative

Range Rule Partnering Team

Range Rule Risk Methodology Partnering Team

Santa Clara County Housing Bond Oversight Committee

Western Region Hazardous Substance Research Center Outreach Advisory Committee

**Consulting Experience:**

Bronx Community Board #4

Communities for a Better Environment

Council of Energy Resource Tribes

Kaho‘olawe Island Reserve Commission

Manhattan Center for Science and Mathematics Parents Association

Military Toxics Project

Natural Resources Defense Council

New Bedford (MA) Brownfields to Healthfields

New York Lawyers for the Public Interest

Physicians for Social Responsibility—Los Angeles Office

RAND Corporation

Rockefeller University Program on the Human Environment

Silicon Valley Toxics Coalition

Seaport Coalition (Manhattan)

South Bronx Committee for Toxic-Free Schools

U.S.EPA Soil Gas Safe Project

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**From:** Brian Smith <bsmith@citizenscampaign.org>  
**Sent:** Monday, August 11, 2025 8:10 PM  
**To:** CHIPSNEPA@chips.gov  
**Subject:** [EXTERNAL] CCE Comments on Micron DEIS  
**Attachments:** CCE Comments Micron DEIS\_081125.pdf

To Whom it May Concern:

Please see comments from Citizens Campaign for the Environment (CCE) on the Micron Semiconductor Manufacturing Project Draft Environmental Impact Statement attached. Thank you for your consideration.

Sincerely,

Brian Smith  
Associate Executive Director  
Citizens Campaign for the Environment  
(716) 472-4078 (cell)  
[bsmith@citizenscampaign.org](mailto:bsmith@citizenscampaign.org)  
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August 11, 2025

Onondaga County Industrial Development Agency  
ATTN: Micron Project  
335 Montgomery Street, Floor 2M  
Syracuse, New York 13202  
[CHIPSNEPA@chips.gov](mailto:CHIPSNEPA@chips.gov)

**RE: Comments on Micron Semiconductor Manufacturing Project Draft Environmental Impact Statement**

On behalf of Citizens Campaign for the Environment (CCE) and our 120,000 members across New York State, we appreciate the opportunity to submit comments on Micron Semiconductor Manufacturing Project Draft Environmental Impact Statement (DEIS). CCE is a 120,000 member, non-profit, non-partisan organization that empowers communities and advocates solutions to protect public health and our environment. While we recognize the potential economic benefits associated with Micron's Proposed Project and the need for a chips manufacturing facility, the environmental costs, as outlined in the DEIS, are deeply concerning and, if left unmitigated, pose an unacceptable threat to New York's environment and public health.

Micron must demonstrate its commitment to being a good corporate neighbor and environmental steward by supporting a thorough and meaningful environmental review process that prioritizes community health, environmental integrity, and long-term sustainability. However, the DEIS falls short of that standard, leaving the community and environment at risk of irreparable harm from pollution and the destruction of the region's ecological landscape. The DEIS fails to adequately address critical concerns regarding the use, treatment, and monitoring of per- and polyfluoroalkyl substances (PFAS), the destruction and degradation of valuable wetlands and surface waters, the impact on local and regional water quality and drinking water resources, and the facility's excessive energy demands.

CCE offers the following recommendations and improvements to be incorporated into the Micron Semiconductor Manufacturing Project Final Environmental Impact Statement:

**Limit The Use of PFAS Chemicals in Manufacturing Processes and Prioritize Safer Alternatives**

The semiconductor industry is a well-documented major user of PFAS chemicals. These toxic "forever chemicals" are known to be used throughout the fabrication processes including for photolithography and most frequently in plasma etching, a core step in the fabrication of microchips.

Micron states that they are evaluating potential non-PFAS containing alternatives, yet they claim that “there are no known substitutes for many PFAS uses.” However, this assertion is overly broad and misleading. While it is true that PFAS currently play a role in some semiconductor processes, a growing body of research and industry innovation has identified safer, effective alternatives for some of these applications. In fact, researchers have demonstrated success using alternative chemistries such as alkyl polyglucoside and polyoxyethylene surfactants in specific production steps. Toxicity assessments show that these alternatives pose significantly lower risks to human health compared to PFAS. More than 100 semiconductor companies have successfully tested and implemented these safer options.

Micron must not treat the absence of drop-in replacements as justification for business-as-usual use of toxic PFAS chemicals. Rather than focusing narrowly on whether identical substitutes exist, Micron should conduct a rigorous alternatives assessment that considers process redesign, material substitution, and other innovative solutions. A commitment to eliminating PFAS where safer options exist should be a minimum requirement for a project of this scale.

Additionally, Micron must avoid the common industry practice of replacing one harmful PFAS chemical with another. While industries have mostly phased out two PFAS compounds, PFOA and PFOS, many industries are simply substituting them with other short chain PFAS chemicals that pose similar risks to human health and the environment. Substituting one PFAS with another is not a meaningful solution, and it perpetuates a cycle of contamination and harm. ***Micron should commit to phasing out the use of all PFAS chemicals, not just those currently regulated, and prioritize safer, non-PFAS alternatives wherever technically feasible.*** This proactive approach would demonstrate true leadership in pollution prevention and align with New York State’s broader efforts to reduce PFAS contamination and exposure.

The urgency to limit the use of PFAS at the Proposed Project is heightened by the fact that Onondaga County is already overburdened with existing PFAS sources. The region is home to a wide array of industrial facilities that have historically used or continue to use PFAS chemicals. These include airports, waste management facilities, metal finishing operations, plastics and resin manufacturers, electronics production plants, chemical processors, cleaning product manufacturers, and glass production sites. These facilities are potentially releasing PFAS into the environment through air emissions, wastewater discharges, and improper waste handling, placing a significant burden on local water resources and public health.

In 2019, the U.S. Environmental Protection Agency (EPA) announced that it had compiled data on facilities across the country that may be handling PFAS. Though the agency initially withheld this information from the public, the nonprofit organization Public Employees for Environmental Responsibility (PEER) filed a Freedom of Information Act (FOIA) request and ultimately sued the EPA to compel its release. In July 2021, PEER obtained the data and developed a national map identifying more than 120,000 facilities nationwide that may be using PFAS. Approximately 3,200 of these facilities are located in New York State, including over 140 in Onondaga County alone.

This concentration of PFAS-handling facilities in Central New York poses a significant environmental and public health risk. Onondaga County is a water-rich region with an interconnected network of lakes, rivers, wetlands, and tributaries, including Onondaga Lake, the Seneca and Oneida Rivers, Nine Mile Creek, and other critical waterways. Water does not stay within county boundaries, and PFAS contamination released locally has the potential to travel extensively, affecting drinking water sources, aquatic ecosystems, and downstream communities far beyond the county line.

While Onondaga County already contends with significant PFAS use, the scale and volume of PFAS anticipated at the proposed Micron semiconductor facility far exceed those of any existing operation in the region. This would introduce a new and unprecedented PFAS burden, heightening the toxic legacy already present. PFAS chemicals are exceptionally persistent in the environment and resistant to natural degradation. Once released, they accumulate in water, soil, and living organisms. Human exposure is linked to serious health outcomes including cancer, thyroid and liver disease, reproductive harm, developmental delays, and immune system dysfunction.

Given these risks, it is critical that the DEIS not treat Micron's PFAS use and discharge in isolation. Instead, the analysis must address cumulative impacts and account for the broader regional context of ongoing PFAS use and contamination. The addition of a facility of this scale, projected to use and discharge vast quantities of PFAS, represents a significant threat to regional water quality, public health, and the environment. Without significant changes to eliminate or reduce PFAS use and adopt safer alternatives the proposed Micron facility risks becoming a major new source of long-term pollution in a community already grappling with a legacy of industrial contamination.

### **Chemical Vendor Transparency and PFAS Monitoring**

According to the DEIS, Micron would request detailed chemical constituent documentation from its chemical vendors, including PFAS content. Micron claims this often requires the use of non-disclosure agreements (NDAs) to obtain such information. However, invoking trade secrecy or relying on NDAs must not serve as a barrier to full chemical transparency and environmental accountability. The public has a right to know about the hazardous chemicals being used, stored, and discharged into their communities. Shielding such information undermines regulatory oversight, public trust, and the ability to assess risks.

New York State has a well-established history of rejecting the classification of emerging contaminants, including PFAS, as protected trade secrets when public health and environmental protection are at stake. The State has enacted multiple laws that prohibit manufacturers from using trade secret claims to conceal the presence or concentration of toxic substances, including the 1,4-dioxane and PFAS disclosure requirements in household cleaning and personal care products. While these are product-specific mandates, they reflect a broader legislative and policy direction that prioritizes transparency and rejects secrecy for hazardous emerging contaminants. This precedent reinforces the principle that trade secret protections cannot be used to circumvent environmental accountability or public right-to-know laws.

Regardless of whether PFAS-related information is shielded under NDAs from individual chemical vendors, Micron is explicitly aware of the types and quantities of PFAS present in the products they procure and use. As a global manufacturing giant, Micron has significant market leverage and should use that leverage to demand full disclosure of PFAS content, including which PFAS chemicals are present, at what concentrations, and what they are used for from all suppliers. Any claim of confidentiality must not override the obligation to provide full transparency to the public and regulatory authorities. Non-disclosure cannot justify withholding critical information that affects environmental health and safety.

Micron should be required to monitor, track, and treat for every PFAS chemical used at its facility and to disclose this information proactively and publicly. Transparent reporting and full disclosure are essential not only for building community trust but also for ensuring that appropriate regulatory controls and pollution prevention strategies are in place. Without this transparency, the community and environment remain at unacceptable risk from PFAS contamination.

***Micron must not allow trade secret claims or non-disclosure agreements to obstruct full transparency regarding the presence, type, and concentration of PFAS and other hazardous chemicals used in its operations.*** CCE urges Micron to use its significant purchasing power to demand this information from its suppliers and to ensure it is made publicly available, aligning with New York State's clear legislative trend toward chemical disclosure and environmental transparency.

#### **On-Site Pretreatment of PFAS and Unbuilt Industrial Wastewater Treatment Plant**

CCE supports Micron's commitment to pretreating wastewater on-site; however, on-site pretreatment must go beyond just PFOA and PFOS and include all PFAS chemicals detected or used in operations. Pretreatment presents a critical opportunity to prevent the introduction of a new source of PFAS pollution into the environment. Micron is fully aware of every type of PFAS that will be used at the facility as part of its chemical procurement processes. With this knowledge, Micron should be required to ensure that these chemicals are being captured and removed from wastewater on-site to the fullest extent possible before discharged or sent to wastewater treatment facilities that may not be capable of treating for PFAS. ***CCE recommends Micron commit to pretreating PFAS down to the lowest technically feasible and achievable standard and provide detailed plans on how this will be accomplished on-site.*** Without comprehensive pretreatment, the community and surrounding watershed could face long-term contamination risks from PFAS chemicals.

Most conventional wastewater treatment plants are currently unable to remove PFAS from effluent before it is discharged into surrounding water bodies. These facilities were not designed to handle or treat for contaminants like PFAS, meaning that once wastewater containing PFAS enters a treatment plant, the chemicals often pass through the system largely unaltered and are released directly into the environment. This creates a clear and concerning pathway for PFAS to contaminate surface water, sediment, and aquatic ecosystems. Given the expected volume of PFAS use at the Micron facility, every effort must be made to prevent PFAS from leaving the site in the first place. Sending PFAS-laden wastewater to a treatment plant that cannot effectively remove these substances is both environmentally irresponsible and a threat to regional water

resources and public health. ***CCE recommends that Micron ensures all PFAS chemicals are removed at the source through comprehensive on-site pretreatment to avoid offloading this burden onto already ill-equipped public infrastructure.***

While the DEIS notes that Micron would apply to the Onondaga County Department of Water Environment Protection (OCDWEP) for a permit prior to the start of operations, including submission of a Basis of Design report recommending engineering treatment technologies, this plan is incomplete and overly reliant on an unbuilt and undesigned industrial wastewater treatment plant. OCDWEP proposes a two-stage plan: an interim solution using the existing Onondaga Wastewater Treatment Plant and a longer-term plan to build a new Industrial Wastewater Treatment Plant (IWWTP) at the Oak Orchard site. However, the DEIS lacks concrete details on the timeline, capacity, and treatment capabilities of this facility.

The DEIS states that OCDWEP will be designing the IWWTP to use the most advanced pollutant treatment and removal technologies available including technologies specifically designed to remove emerging PFAS chemicals, such as reverse osmosis, granular activated carbon, ion exchange resins, and advanced oxidation processes. In the absence of a fully designed and operational IWWTP, Micron must commit to advanced pretreatment measures on-site. This includes a full evaluation of PFAS uses, monitoring for all PFAS compounds, and implementation of best available technologies to minimize discharges. ***CCE further recommends that Micron be required to submit a detailed pretreatment plan for public and regulatory review well in advance of any industrial discharges.***

Given the uncertainty around the county's timeline and treatment capabilities, Micron's pretreatment efforts must be robust to ensure environmental and public health protections are not compromised.

### **Risks to Water Quality and Drinking Water Resources**

The Proposed Project raises serious concerns regarding its potential long-term impacts on water quality and drinking water resources, both within the immediate project area and across the greater Lake Ontario watershed. The DEIS anticipates a significant and permanent increase in impervious surface coverage as a result of site development and industrial operations. Increased impervious surfaces significantly reduce natural infiltration, increasing surface runoff, and accelerating the transfer of pollutants, such as oils, heavy metals, nutrients, and sediment, into nearby waterways. These effects are especially pronounced during high-intensity precipitation events, which are becoming more frequent due to climate change, and could exacerbate flood risk, overwhelm aging water infrastructure, and degrade downstream water quality.

***CCE appreciates Micron's commitment to incorporating green infrastructure into its stormwater management practices but urges Micron to ensure this approach remains a priority moving forward.*** Green infrastructure represents the most effective and sustainable method to manage the substantial increase in stormwater runoff anticipated from the Proposed Project. Micron must be required to implement green infrastructure practices, such as permeable pavement, bioswales, green roofs, and preserved wetlands, to mitigate runoff and reduce the pollutant load entering regional water systems. These site design strategies are critical for offsetting the massive increase in stormwater runoff that will result from impervious surface

expansion. By maximizing infiltration, green infrastructure will play a key role in protecting local water quality and reducing the environmental impact of the Micron Campus.

Though the DEIS notes that water withdrawn for the Proposed Project would be returned to Lake Ontario, one of the largest freshwater sources in North America, this framing is misleading. Municipal drinking water supply and wastewater resources would be irretrievably committed to supporting Micron's operations, including the construction of entirely new water intake and distribution infrastructure designed solely to meet the extraordinary demands of the Proposed Project. While Lake Ontario may offer volume capacity, it is the *quality* of returned water, not just the quantity, that must be critically examined. Without robust, enforceable pretreatment and monitoring standards, there is a significant risk that industrial wastewater, including hazardous and emerging contaminants, could compromise drinking water safety and aquatic ecosystems of Lake Ontario. ***CCE recommends that Micron and regulatory agencies prioritize strict, enforceable pretreatment standards and continuous monitoring to ensure that all water returned to Lake Ontario is of the highest quality and does not pose a threat to drinking water or aquatic ecosystems.*** Public reporting on water withdrawal volumes, discharge composition, and any exceedances of pollutant limits should be made regularly available to the public in an accessible format.

The DEIS also fails to recognize the vital role that wetlands and streams play in maintaining clean water supplies and protecting communities from flooding. Wetlands act as natural filters, absorbing pollutants such as nitrogen, phosphorus, pesticides, and other contaminants before they reach lakes, rivers, and streams. They recharge groundwater supplies, support biodiversity, and buffer communities from extreme weather events. Many of New York's most critical wetlands have already been filled, dredged, or drained, contributing to widespread water pollution and increased flood risk. The proposal to permanently fill over 200 acres of wetlands in a water-rich region like Central New York poses a significant threat to water quality, drinking water supplies, and watershed integrity. Destroying these wetlands undermines long-standing state and federal efforts to protect drinking water and restore ecological balance.

Wetlands do not exist in isolation, they are integral components of the regional hydrological system and directly influence the health and integrity of downstream waters. The destruction of wetlands at the project site will have consequences that extend far beyond the project footprint, potentially impacting surface water quality, groundwater recharge, and aquatic ecosystems throughout the Lake Ontario watershed. ***Every effort should be made to preserve the high value wetlands within the Proposed Project site.***

In addition to wetlands, small streams play a critical role in water protection. Approximately 11.2 million New Yorkers depend on public water systems that rely on headwaters and small streams. These waterbodies, regardless of their size or frequency of flow, are hydrologically connected to larger downstream systems and contribute significantly to overall watershed health. While the DEIS claims that perennial streams will be avoided, the plan to fill thousands of linear feet of ephemeral and intermittent streams remains deeply concerning. These smaller streams provide essential ecological and hydrological functions, such as transporting sediment and nutrients, supporting aquatic life, and mitigating flooding during snowmelt or heavy rain events. The DEIS fails to adequately assess the cumulative and downstream impacts of filling these streams, which

could degrade regional water quality and undermine ecosystem resilience. *CCE recommends that Micron conduct a comprehensive assessment of the cumulative and downstream impacts of filling ephemeral and intermittent streams, and ensure their protection through first avoidance, second minimization, and only then robust mitigation measures.*

Given the scale and permanence of Micron's water infrastructure demands, the company must be held to a higher standard of environmental accountability. Protecting water quality is not only essential for ecological health but also for preserving the drinking water quality and public health of the neighboring communities.

### **Significant and Irreversible Wetland and Surface Water Losses**

New York's wetlands and streams are vital to clean water, critical habitats, and climate resiliency. According to the US Fish and Wildlife Service, since colonization, New York has lost approximately half of its wetlands. Wetlands are home to many of New York's threatened and endangered plant and animal species and water held in wetlands percolates into the ground, replenishing groundwater sources for private and municipal water systems. Permanently filling the streams and wetlands on the Proposed Project site is in stark contrast with state efforts to increase and expand protections.

CCE is deeply concerned by the scale and severity of wetland and surface water impacts identified in the DEIS. According to the DEIS, the construction of the Proposed Project and Connected Actions would result in the permanent loss of approximately 193.38 acres of federal jurisdictional wetlands and 6,283 linear feet of jurisdictional surface water features, primarily at the Micron Campus and Rail Spur Site. This level of impact represents one of the most substantial wetland disturbances for any single industrial project in New York State in recent decades and constitutes an unavoidable significant adverse environmental impact as acknowledged by the DEIS itself.

Wetlands are irreplaceable natural resources that provide critical ecosystem services, including water filtration, flood mitigation, carbon sequestration, essential habitats, and groundwater recharge. The affected wetlands are not isolated patches of land; they are part of a broader, interconnected hydrological system within the Oneida River watershed that ultimately connects to the Oswego River and Lake Ontario. Their destruction will have ongoing consequences affecting surface water quality, increasing flood risks, and disrupting habitat corridors that support native fish, bird, and amphibian populations.

According to the NYSDEC Environmental Resource Mapper, the Proposed Project site contains state-regulated freshwater wetlands, streams listed on the Waterbody Inventory/Priority Waterbodies List, and habitats for rare, threatened, or endangered plant and animal species. Many of these wetlands are classified as Class II and III, offering pollution control, species protection, and groundwater recharge. Destroying over 200 acres of these high-value wetlands contradicts the intent of the 2022 amendments to the New York State Freshwater Wetlands Act, which aimed to expand protections and prevent precisely this kind of ecological destruction and degradation.

According to the NYSDEC Environmental Resource Mapper, the streams on the Proposed Projects site are Class C streams that are part of the Oswego-Seneca-Oneida Drainage Basin. These streams support vibrant ecosystems and aquatic life in connecting waterbodies. The DEIS must consider the impacts of filling in streams on fish and aquatic life in the region. Oneida Lake, considered one of the best fisheries in the state for healthy walleye, yellow perch, and black bass, is also the main location for walleye egg collection. Additionally, lake sturgeon, a NYS listed threatened species, reside in Oneida Lake. Filling in wetlands and streams on the Proposed Project site could negatively impact water quality in Oneida Lake and diminish these critical fish populations.

While the Proposed Project avoids impacts to perennial streams, the loss of ephemeral and intermittent streams is substantial. Ephemeral and intermittent streams make up approximately 59% of all streams in the United States. These streams are vital for maintaining the overall health of perennial streams, the watershed, and water quality. According to the US EPA, ephemeral and intermittent streams provide the same ecological and hydrological functions as perennial streams by moving water, nutrients, and sediments through the watershed. The loss of over 6,700 linear feet of these streams on the proposed site will have a ripple effect throughout the watershed. During snow melt and heavy rains, these streams help drain and move excess water and nutrients, while also providing essential habitat for a variety of species.

***CCE strongly urges that Micron revise its site plan to avoid and minimize wetland and stream impacts to the greatest extent possible before relying on mitigation.***

#### **Inadequacies of the Proposed Mitigation Plan**

While CCE recognizes that Micron, in coordination with United States Army Corps of Engineers (USACE) and NYSDEC, is developing a mitigation plan under Section 404 of the Clean Water Act and Article 24 of the Environmental Conservation Law, the proposed 2:1 mitigation ratio and off-site restoration efforts do not sufficiently compensate for the ecological loss of over 200 acres of natural wetlands and over 7,800 linear feet of surface water features.

The mitigation sites may protect acreage and satisfy regulatory requirements on paper, but they do not replace the functions, values, or geographic context of the destroyed wetlands. Wetland restoration efforts, while important, rarely replicate the complexity, biodiversity, and resilience of mature, undisturbed wetlands. Additionally, the DEIS does not provide adequate detail on the specific hydrological, ecological, and management characteristics of the proposed mitigation areas to allow for meaningful public review or assessment of their long-term viability.

***CCE recommends that the mitigation ratio be increased to at least 10:1 and that mitigation be conducted on-site or within immediate hydrological proximity whenever feasible to better replicate lost ecosystem services and maintain watershed integrity.*** The Final EIS must also include a fully detailed mitigation plan with specific site selection criteria, ecological design principles, adaptive management plans, long-term monitoring protocols, and enforceable protection measures.

The DEIS notes that a portion of the wetland losses from construction of the Proposed Project would be subject to an existing conservation easement established as part of National Grid's

Clay-Teal Project. *CCE recommends that all proposed mitigation areas be protected in perpetuity through enforceable conservation easements or similar legal instruments to ensure long-term stewardship and prevent future degradation or development.*

### **Enhance Energy Efficiency**

It is estimated that the Proposed Project would increase New York's electricity demand by 10%. This level of demand is environmentally unsustainable, particularly in light of New York's climate targets under the Climate Leadership and Community Protection Act (CLCPA).

*CCE supports Micron's commitment to achieving LEED Gold certification for all fabrication facilities and urges the company to go further by committing to LEED Platinum certification for all office and administrative buildings associated with the campus.* LEED Platinum represents the highest standard of sustainable building design and energy efficiency, demonstrating leadership in minimizing environmental impact while promoting occupant health and long-term cost savings. Office buildings typically offer more flexibility for incorporating deep energy savings through building envelope improvements, smart HVAC systems, passive solar design, and high-efficiency lighting and appliances. Achieving LEED Platinum would not only align with New York State's climate mandates but would also set a strong precedent for responsible corporate development in the region.

The cleanest, most cost-effective energy is the energy that is never used. Given the unprecedented scale of energy consumption projected for this facility it is imperative that Micron implement the most aggressive energy efficiency strategies available. These strategies should include, at a minimum, real-time energy monitoring, process energy optimization, heat recovery systems, and other energy saving measures. All operational systems, whether for manufacturing, cooling, lighting, or computing, must be adjusted for minimal energy intensity.

By minimizing demand at the source, Micron can reduce its reliance on new or expanded energy generation, including potentially controversial nuclear development. *CCE strongly urges the incorporation of a transparent, facility-wide Energy Management Plan that includes annual reporting and continuous performance improvement benchmarks aligned with New York's CLCPA.*

### **Increase in On-Site Renewable Energy Generation**

CCE supports the proposed installation of on-site renewable energy systems and on-site battery storage systems to supplement the Proposed Project's energy supply. These systems are an important component of reducing dependence on fossil fuels and meeting New York's climate goals under the CLCPA. However, the level of renewable energy generation currently proposed in the DEIS is severely insufficient.

While the installation of approximately 4 MW of solar capacity is a positive step, it would provide only a minuscule fraction of the facility's total energy demand. Large-scale semiconductor fabrication campuses can consume hundreds of megawatts, by contrast, the proposed 4 MW solar would produce a negligible amount of power in comparison to Micron's projected energy consumption. CCE understands that it is not feasible to generate enough on-site solar energy to fully meet the facility's substantial electricity demands; however, the minimal

solar capacity proposed in the DEIS falls far short of a meaningful effort, and ***Micron must do significantly more to maximize on-site renewable energy generation.***

Moreover, the DEIS states only that “Micron would plan to install solar panels on the roofs of certain Micron Campus buildings,” yet it fails to provide sufficient details regarding the proposed locations, total available rooftop square footage, or design capacity. Without this information, the public and permitting authorities cannot evaluate whether Micron is making a good-faith effort to maximize its on-site solar generation potential. The DEIS states that solar panels are being considered for the rooftops of parking structures, water and wastewater treatment facilities, and biological treatment buildings; however, it remains unclear whether Micron has evaluated all viable rooftop, canopy, or adjacent land areas for solar deployment.

***CCE strongly recommends that the final EIS includes a detailed, site-specific solar energy deployment plan.*** This plan should evaluate all feasible and environmentally responsible solar installation areas across the campus, including building rooftops, parking canopies, adjacent unused land, and other infrastructure, to ensure maximum deployment. A transparent analysis of potential and expected energy generation should be included to demonstrate that Micron is taking its renewable energy obligations seriously.

In addition to solar, Micron should be required to assess other forms of renewable energy generation that may be feasible on-site or within its control. Geothermal heating and cooling systems are particularly effective at reducing energy loads in large-scale buildings and campuses. Central New York has favorable subsurface conditions for geothermal exchange systems, and a geothermal feasibility study should be required as part of the final EIS.

Finally, the DEIS does not provide any quantifiable benchmarks or timetables for renewable energy installation. ***CCE urges the inclusion of binding commitments to install on-site renewable energy systems that scale with the facility’s development phases.*** These commitments must include annual progress reporting, public transparency, and integration with broader climate mitigation planning.

While the proposed 4 MW solar installation is a welcome gesture, it is far from sufficient. Micron must produce a comprehensive and transparent renewable energy generation and deployment plan that reflects the scale of Micron’s energy demands and the urgency of New York’s climate goals. Passive efforts and vague language will not suffice.

### **Prioritize Proven Renewable Energy Over Speculative New Nuclear Development**

While it is commendable that Micron has committed to purchasing 100% carbon-free electricity through power purchase agreements and renewable energy credits (RECs), CCE strongly cautions against any attempt to rely on new nuclear power to meet its energy needs. While nuclear energy is technically carbon-free in terms of emissions during operation, it is far from environmentally benign. The nuclear fuel cycle from uranium mining to spent fuel disposal has serious and long-lasting environmental impacts, including radioactive waste that remains hazardous for thousands of years and for which there is still no permanent disposal solution.

New nuclear plants are also notoriously expensive to build, often exceeding initial budgets by billions of dollars, and take decades to permit, site, and construct, well beyond the timeframe needed to support Micron's phased development. In New York State, proposed nuclear projects have been plagued by major delays, siting challenges, lack of community support, and unresolved questions about long-term radioactive waste storage. While Governor Hochul recently announced a state initiative to explore the development of advanced nuclear technologies, this effort remains in its earliest stages. There are currently no licensed, sited, or shovel-ready new nuclear facilities in New York, and any resulting generation, if developed at all, would not come online until well after Micron's operational timeline. Therefore, it is neither realistic nor responsible to assume that future nuclear development could serve as a source of carbon-free energy for Micron within the required timeframe.

Any dependence on future nuclear development introduces unacceptable financial, environmental, and logistical risks into Micron's energy planning. Instead, Micron should prioritize renewable energy sources that are proven, safe, cost-effective, and rapidly deployable. Solar, wind, and geothermal technologies not only provide sustainable power but also foster local job creation, reduce long-term energy costs, and align with New York's legally binding climate goals under the CLCPA.

*CCE urges Micron to invest in scalable and achievable renewable energy solutions*, both on-site and through regional procurement, and to avoid speculative energy strategies like new nuclear, which are incompatible with the urgent need to reduce greenhouse gas emissions, protect public health, and meet development timelines responsibly.

### **Summary of Recommendations**

CCE strongly urges that the final EIS for the Micron Semiconductor Manufacturing Project reflect meaningful improvements that prioritize pollution prevention, environmental transparency, and sustainable development. CCE offers the following summary of recommendations:

- 1. Phase Out PFAS Use and Prioritize Safer Alternatives**  
Micron must commit to phasing out all PFAS chemicals, not just those currently regulated, and prioritize non-PFAS alternatives wherever technically feasible. A robust alternatives assessment must consider process redesign, material substitution, and safer alternatives already in use within the industry. Substituting one PFAS chemical for another is not acceptable.
- 2. Ensure Full Chemical Transparency and Reject NDAs**  
Non-disclosure agreements must not be used to conceal PFAS and other hazardous chemicals from the public or regulators. Micron should require full disclosure from chemical vendors and provide transparent, public reporting of all PFAS types and quantities used.
- 3. Require Comprehensive On-Site Pretreatment of PFAS**  
All PFAS compounds used at the facility—not just PFOA and PFOS—must be treated at the source to the lowest technically feasible and achievable standard. Micron should submit a detailed pretreatment plan for public and regulatory review, independent of the proposed, unbuilt industrial wastewater treatment plant. Given that conventional wastewater treatment

plants cannot effectively treat PFAS, Micron must prevent off-site discharges of PFAS-contaminated wastewater.

**4. Protect Water Quality and Drinking Water Resources**

Micron must be required to implement robust green infrastructure strategies to manage stormwater and minimize runoff. All discharges must meet stringent pretreatment standards and be subject to public reporting and monitoring.

**5. Avoid and Minimize Wetland and Stream Destruction**

The DEIS must be revised to prioritize avoidance and minimization of wetland and surface water impacts. Destruction of over 200 acres of wetlands and thousands of feet of stream systems is unacceptable and should prompt a re-evaluation of the site layout and project footprint.

**6. Strengthen and Localize Wetland Mitigation**

The proposed 2:1 mitigation ratio is inadequate. CCE recommends a minimum 10:1 mitigation ratio with on-site or hydrologically proximate mitigation wherever feasible. The final EIS must include detailed, enforceable mitigation plans, including long-term monitoring and legal conservation protections.

**7. Enhance Energy Efficiency and Commit to LEED Platinum**

Micron must implement aggressive energy efficiency strategies across all operations and commit to LEED Platinum certification for all non-fabrication buildings. A comprehensive Energy Management Plan with public performance tracking should be included in the final EIS.

**8. Maximize On-Site Renewable Energy Generation**

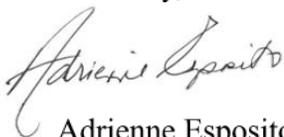
The proposed 4 MW of on-site solar capacity is wholly inadequate. Micron must evaluate and maximize all feasible rooftop, canopy, and adjacent land solar installations, and assess geothermal and other renewable options. The final EIS must include a binding, transparent deployment plan with measurable benchmarks and public reporting.

**9. Reject New or Advanced Nuclear as an Energy Solution**

New nuclear development is speculative, costly, and incompatible with Micron's operational timeline. Micron should instead prioritize proven, rapidly deployable renewable energy sources, such as solar, wind, and geothermal, to meet its carbon-free electricity goals.

Micron's proposed facility represents one of the largest and most resource-intensive industrial developments in New York State history. The scale of the project demands a correspondingly rigorous and precautionary environmental approach. CCE urges the CPO and OCIDA to incorporate these recommendations into the final EIS to ensure the project does not compromise public health, clean water, ecological integrity, or the state's climate goals.

Sincerely,



Adrienne Esposito  
Executive Director

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**From:** Sonja <sonjamariedence1@gmail.com>  
**Sent:** Monday, August 11, 2025 9:47 PM  
**To:** CHIPSNEPA@chips.gov  
**Subject:** [EXTERNAL] Homes in Clay

I have heard that Micron is trying to push people out of their homes, when they do not want to leave! If they don't want to leave why can't they just change their plans to work around their homes and land. The home I am referring to is the Kings on Caughdenoy Rd. I know they have been there a very long time and they are pillars of the community.

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**From:** William Spreter <wspreter@gmail.com>  
**Sent:** Monday, August 11, 2025 1:39 PM  
**To:** CHIPSNEPA@chips.gov  
**Subject:** [EXTERNAL] Micron Project Commentary and Guidelines from NYSUT RC7

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> NYSUT Retiree Council 7, representing thousands of retired educators in Central New York, welcomes Micron as a good neighbor. To ensure that relationship is a long and beneficial one to both parties, we ask that certain guidelines be established.  
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> NYSUT Retiree Council 7, along with many other union, environmental, workforce, public health and safety organizations ask that the organizations that control Micron’s development in Central New York take into consideration workplace safety; creation of good paying jobs in a union- accepting climate; no adverse impact on school funding; environmental quality and continued monitoring; good housing and transportation.  
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>  
> First, the health and safety from toxic chemicals used to make chips must not pollute air, soil, fish, wildlife, and drinking water. A long term, continuing monitoring of this must be in the plan with enough resources to sustain it.  
>  
> Second, commit to ensuring that clean water and energy in abundance will be affordable to the area into the future. Ratepayers should not shoulder the burden. Also, generate renewable energy with a low carbon impact.  
>  
> Third, safe working conditions are necessary. We know the workers will be exposed to toxic chemicals and all measures must be taken for their sake as well as their families.  
> In addition, we seek pay equity, and a diverse workforce that would be allowed to unionize without adverse ramifications. To further aid working families, public transportation and child care on site or near would be helpful.  
>  
> Fourth, invest in housing needed for existing and new residents. Mixed income and affordable housing will be needed, and micron must be involved in a cooperative effort to bring that about.  
>  
> Fifth, tax abatements to Micron must not come at the expense of schools and students.  
> According to a report issued by “Good Jobs First NY” schools lost a total of \$ 1.8 billion in property tax revenue due to tax abatements granted by IDAs.  
>  
> We would appreciate support and actions on these guidelines. We look forward to your response.  
>  
> Sincerely,  
> NYSUT Retiree Council 7  
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Sent from my iPhone

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**From:** William Spreter <wspreter@gmail.com>  
**Sent:** Monday, August 11, 2025 1:35 PM  
**To:** CHIPSNEPA@chips.gov  
**Subject:** [EXTERNAL] Fwd: Micron Project

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Sent from my iPad

Begin forwarded message:

**From:** William Spreter <wspreter@gmail.com>  
**Date:** August 11, 2025 at 12:54:01 PM EDT  
**To:** Caroline Hill <Caroline.Hill@nysut.org>  
**Subject:** Micron Project

NYSUT Retiree Council 7, representing thousands of retired educators in Central New York, welcomes Micron as a good neighbor. To ensure that relationship is a long and beneficial one to both parties, we ask that certain guidelines be established.

NYSUT Retiree Council 7, along with many other union, environmental, workforce, public health and safety organizations ask that the organizations that control Micron's development in Central New York take into consideration workplace safety; creation of good paying jobs in a union- accepting climate; no adverse impact on school funding; environmental quality and continued monitoring; good housing and transportation.

First, the health and safety from toxic chemicals used to make chips must not pollute air, soil, fish, wildlife, and drinking water. A long term, continuing monitoring of this must be in the plan with enough resources to sustain it.

Second, commit to ensuring that clean water and energy in abundance will be affordable to the area into the future. Ratepayers should not shoulder the burden. Also, generate renewable energy with a low carbon impact.

Third, safe working conditions are necessary. We know the workers will be exposed to toxic chemicals and all measures must be taken for their sake as well as their families. In addition, we seek pay equity, and a diverse workforce that would be allowed to unionize without adverse ramifications. To further aid working families, public transportation and child care on site or near would be helpful.

Fourth, invest in housing needed for existing and new residents. Mixed income and affordable housing will be needed, and Micron must be involved in a cooperative effort to bring that about.

Fifth, tax abatements to Micron must not come at the expense of schools and students. According to a report issued by "Good Jobs First NY" schools lost a total of \$ 1.8 billion in property tax revenue due to tax abatements granted by IDAs.

We would appreciate support and actions on these guidelines. We look forward to your response.

Sincerely,  
NYSUT Retiree Council 7

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**From:** William Spreter <wspreter@gmail.com>  
**Sent:** Monday, August 11, 2025 1:45 PM  
**To:** CHIPSNEPA@chips.gov  
**Subject:** [EXTERNAL] CNY chapter of NYSARA advocating for workplace safety, environmental concerns, good pay, and a union-friendly workplace

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- > The CNY chapter of NYSARA, representing thousands of retired union members in Central New York, welcomes Micron as a good neighbor. To ensure that relationship is a long and beneficial one to both parties, we ask that certain guidelines be established.
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- > CNY chapter of NYSARA, along with many other union, environmental, workforce, public health and safety organizations ask that the organizations that control Micron's development in Central New York take into consideration workplace safety; creation of good paying jobs in a union- accepting climate; no adverse impact on school funding; environmental quality and continued monitoring; good housing and transportation.
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- > First, the health and safety from toxic chemicals used to make chips must not pollute air, soil, fish, wildlife, and drinking water. A long term, continuing monitoring of this must be in the plan with enough resources to sustain it.
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- > Second, commit to ensuring that clean water and energy in abundance will be affordable to the area into the future. Ratepayers should not shoulder the burden. Also, generate renewable energy with a low carbon impact.
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- > In addition, we seek pay equity, and a diverse workforce that would be allowed to unionize without adverse ramifications. To further aid working families, public transportation and child care on site or near would be helpful.
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- > Fourth, invest in housing needed for existing and new residents. Mixed income and affordable housing will be needed, and micron must be involved in a cooperative effort to bring that about.
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- > Fifth, tax abatements to Micron must not come at the expense of schools and students.
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- >
- > We would appreciate support and actions on these guidelines. We look forward to your response.
- >
- > Sincerely,
- > CNY chapter of NYSARA
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Sent from my iPhone

Sent from my iPhone

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**From:** sandra tuoribell <s3doh@msn.com>  
**Sent:** Monday, August 11, 2025 11:52 PM  
**To:** chipsnepa@chips.gov  
**Subject:** [EXTERNAL] Micron DEIS EISX-006-55-CPO-001

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Sent via the Samsung Galaxy S10e, an AT&T 5G Evolution capable smartphone

My purpose in writing is to express my concerns with the Draft Environmental Impact Statement for Micron Semiconductor Manufacturing Project EISX-006-55-CPO-001. I am a resident of the Town of Constantia, Oswego County, NY. I am a member of the Town's Planning and Zoning Board, as well as a director on the Oswego County Soil Water Conservation District Board. My comments do not reflect those of these organizations, agencies. They are based on my years of experience as the manager of a municipal Industrial Pretreatment Program.

The following are my comments.

1. The comment period is grossly inadequate for a document of this size (20,000 pages) and extensions for documents this large are common.
2. The impact report does not include a list of chemicals used in the chipmaking process and will be transported and stored on site. This information is necessary in order for an Industrial Wastewater Discharge Permit to be issued and should be public knowledge. (The compounds and formulae may be proprietary, but the chemicals are not).
3. Chemical storage is not detailed. Although spills are addressed, there is only a superficial discussion. The plant is being built on an aquifer and there is great potential for ground water contamination should a chemical spill, equipment malfunction or system upset occur. Further, downstream wells and waterways could be affected.
4. Stormwater management needs to be addressed. With the destruction of acres of Wetlands and replacement with impervious surfaces, areas downstream of the plant, including Clay, Phoenix, Schropel and Fulton have a greater risk of flooding.
5. The DEIS does not detail the method that will be used for sludge disposal. Additionally, since the waste water will be pretreated and sent to Oak Orchard Wastewater Treatment Plant, the sludge generated at the treatment plant will contain PFAS and cannot be land applied.
6. The actual impact from the destruction of wetlands may not be known for years and the effects may be more harmful than currently predicted.

In closing, I recognize that the economic growth and development that may result from this project will revitalize CNY. However, it should not come at the cost of the environment and the natural resources in our area. Thank you for considering my comments.

Sandra Tuori-Bell  
29 Lakeview Grove  
Constantia, NY 13044  
(c)315 572-6001  
(email): s3doh@msn.com

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**From:** Artesia Wagersreiter <artwagers@protonmail.com>  
**Sent:** Monday, August 11, 2025 11:59 PM  
**To:** chipsnepa@chips.gov  
**Subject:** [EXTERNAL] Fw: Micron Public Comment.

Artesia Wagersreiter

Sent from Proton Mail Android

----- Original Message -----

On 8/11/25 11:57 PM, Artesia Wagersreiter wrote:

Hello,

My name is Artesia. I'm a data analyst and a citizen of Syracuse concerned about the impacts of the Micron development of the health and safety of citizens of Syracuse and Onondaga county. Thank you for the opportunity to public comment. In case there is a concern, did not write any of this with AI and took the time and energy to learn about the topic and write it myself, so I would appreciate if my email was given the same attention.

I am writing to say that the draft does not adequately address how the Micron project will impact my community and CNY as a whole. Central New York deserves a facility that is well-built with the workers, citizens, and geography/environment all in mind, and one that will last for years to come. So far, Micron has done less than the bare minimum in terms of evaluating their planned spot and the many impacts it would have on the region. They have also provided a 45-day comment period – the federal minimum – to go over 20,000 pages of work, with a main body length of 700 pages. The working families who will be impacted by this project the most need more time to be made aware of the issue and be given fair opportunities to share their opinions. There needs to be a longer time available for public comment than less than two months in the middle of the summer when most people are on vacation mode, and I previously signed a petition stating the same. I imagine that Micron is hoping for a good relationship with our region, and doing things like this is getting off to a very bad start.

Here are my concerns:

- They need to disclose what chemicals are being used because the discharge is going into the river which is two miles away from where Onondaga drinking water is taken in. This county has already seen enough difficulty with poisoned drinking water, lakes, and building materials. It is abhorrent that Micron would be comfortable to do this, poisoning our entire region.
- The removal of that many trees, shrubs, and wetlands is going to pose a significant loss. At a time when we are seeing temperatures rising more than ever, we desperately need those natural resources to help mitigate the temperature rise and store CO2.
- The ground this is going to be built on is karst - there are gaps, it is notoriously porous, and sink holes on this land – where an impossibly heavy building is going to be – is not a question of “if” but “when.” I want this project to succeed, and not for the planned 16 years of construction – funded by taxpayers! – to be interrupted by a foreseeable event and for the entire project to be scrapped and abandoned, leaving us with the consequences, with no lasting or meaningful cost to Micron.
- At the point when sinkholes develop, any spills that do happen could spread underground, reaching other drinking sources like those who for folks who have wells. Micron did not even evaluate all of the bedrock that they are planning to build on, clearly demonstrating that they are not dedicated to ensuring that things are done right. We do not something this large to be a rushed job, done while everybody is still caught up in the good feelings of future economic prosperity – which won’t even reach us until 2040.
- The reports surrounding the aforementioned economic prosperity, however, appear inflated and unrealistic. While Micron says the average pay will be \$100,000 a year, averages are well-known to ironically be an inaccurate estimate of what is going on with the average worker. To get a true estimate of what we can expect workers to make, we would need the median and mode – or at least common salary ranges for workers. Additionally, \$100,000 means less and less with every year as inflation continues to rise, and they have provided no assurances that their pay will be kept with inflation or that the workers will be treated well.
- Furthermore, they claim to want to hire veterans and women but so far, not only have they not provided enforceable commitments, but their locations worldwide have partaken in aggressive union-busting techniques, which is particularly dangerous in an industry where many hazardous chemicals will be used – which have so far not been disclosed. A lot of talk has happened, but we have nothing to hold them to so that we can actually expect true reduction of poverty in Onondaga county.
- They are saying no more than 60 hours per work with no less than 1 day off per 7 days. Absolutely unacceptable, that is overwork for dangerous work and will kill at least one person. Our workers deserve no more than 50 hours per week with no less than 2 regular days off per 7 days. Having worked rotating shifts, I can confidently say that nobody can comfortably build a life or take care of their family – or even

have a solid sleep schedule, which is paramount to being in good shape and working order to not make mistakes on the job – without having consistent hours and days off. Central new Yorkers deserve more.

- I don't want Micron to have the impression that wetlands are just for environmental folks and hippies, because I feel that really is a smokescreen to hide behind what wetland removal really does, which is increasing flooding - which we're already seeing more of as the weather gets less predictable. Instead of water being absorbed and filtered through wetlands, it'll pick up any kind of chemicals or trash or oil or *whatever* from the area, and carry it into our water sources. There has been no detailed evaluation regarding managing stormwater runoff.
- Mature wetlands – ones that will actually reduce flooding, absorb CO<sub>2</sub>, and mitigate temperature – take a *long* time to develop. Many decades. And no amount of creating new wetlands in other locations can fix what would be destroyed by building this on this location. Micron needs to find a different location. The soybean fields that supposedly would be made into wetlands – or other already-developed land parcels in the area - could be developed into the new location instead. Once they're gone, they're gone.
- I would like to also add that the tragedy of Allied Chemical and the failed Onondaga lake cleanup are still fresh in everybody's memory. I know people who saw the sludge pouring into the lake growing up. We still can't swim in what should be a pristine, glorious body of water that otherwise has the potential to draw people from miles around, especially with the mineral springs. Every time I see the lake, I'm reminded of how one single company and a handful of executives singlehandedly destroyed a whole water source for generations to come, poisoning those who swim in or eat from it – and with no accountability. While some remediation was done, it is nowhere near enough, and the standard of large companies coming into areas, wreaking environmental harm and hurting the residents, and then escaping accountability is almost expected at this point. It will take a lot to earn the trust of these residents, and the many oversights that have been made apparent with just the sliver of what I have read of this proposal (in the few *days* I was aware of it) are not doing anything to help anybody's fears. The benefits will take ages to see, but the negative impacts will be seen immediately.
- Any wetlands that would be created to “replace” what would be destroyed by the Micron development are first of all being proposed to be replaced at a 2:1 ration which is significantly below the standard 1:15 ratio for the industry, and second of all, would be in the hands of Micron. Which is not an environmental company, and I cannot expect that what Micron deems is “enough” – like what 3M has deemed is “enough” for lake Onondaga – would truly be enough and what central new Yorkers deserve.
- They're planning on burning a lot of natural gas annually, which would result in poor air quality for the area - and we already have terrible air quality right now. Central New York used to have dependably excellent air quality and that's quickly slipping away as well, as wildfires from the Canadian border drift across. I spent a bit less than four hours outside a few weeks ago – on a day when it was supposedly only unsafe for unhealthy groups, and I don't have anything wrong with my lungs – and I

haven't been able to get rid of the cough since. I have to check the air quality before going outside now. How are our children's lungs being impacted by the smoke? How would the additional air pollution affect our children's health and chances of survival? Air pollution is a major killer worldwide, and Americans often don't think of it as something that impacts us, but we're seeing it more and more.

- The amount of gas they are planning on building would singlehandedly divert our entire state from their renewables goal, which again is not just for tree-huggers, but is created with the health of our citizens in mind as air pollution kills. They have no meaningful plans about renewables, and in fact they would require an existing solar array to move, possibly removing that benefit from our county. Their burning would create hazardous compounds that we don't need to breathe in, and Micron has not addressed how they would mitigate this significant risk at all.
- The amount of electricity they're planning on using would raise rates for all of us.
- They haven't released a list of PFAS and other chemicals, which exist forever. Burning PFAS is even worse
- They're not providing chemical exposure limits to the public or human health risks.
- They're planning on making a childcare center - this is reminiscent of the Aberfan disaster, where children were killed by a company who wasn't considering the impacts of them. It is irreverent, shows a frightening lack of understanding of the history of similar projects, and frankly insulting that they would presume to put the safety of the *children of their workers* at risk. Again, they have refused to release the chemicals they are using, and a spill event could reach the child care center. I wouldn't want my children to be there, and I don't imagine you – whoever you are reading this – would, either.
- The possible location for handling the waste is in Middlesex New Jersey. I'm from New Jersey, and Middlesex does not need any more trouble. There aren't even any commitments from Micron that they aim to reduce the amount of hazardous waste created by this process.

I am concerned that this project is being significantly rushed, done in the dark, and with as little thought put in as possible. Especially with the amount of taxpayer money that has been given to Micron, it is particularly insulting that they show so little regard for the lives of the Americans who will be their neighbors and employees for the decades to come. The very least that we – the people who pay our hard-earned tax dollars to have them given to huge corporations – deserve is a well thought-out plan that will truly benefit all parties involved. My asks are:

1. Extend the public comment period by at least 4 months and provide at least two more public hearings after the semester starts. At this point, everybody will be back from vacation and will be able to see and truly understand what is happening here. We are stronger together, and everybody's voices are needed in this monumental project – not just those of us who got lucky and found out about the regional impacts from a friend of a friend. We are paying for this, we will be subject to the ramifications, and we deserve a voice.

2. Reevaluate whether the originally planned size will be necessary in light of recent developments from Micron regarding other developments.
3. Find another location in the area suitable for development. We cannot afford the loss of these valuable natural resources of the wetlands and the services they provide. We cannot afford the air and water pollution that will directly impact half a million people. The fastest way to move forward – as I'm sure Micron would like to do – would be to select a less environmentally-sensitive location for the building and resulting operation to occur.
4. Make their grant money contingent on tangible and measurable commitments that they must fulfill. Central New Yorkers deserve accountability from the entity looking to be seen as a savior of the region.

Please consider how you would feel if your friends, family, children were in this area. Had to look at a poisoned lake every day. If your children would possibly work at a company unwilling to disclose the extremely toxic and persistent chemicals that they would be working with on a daily basis.

Thank you for your time and for hopefully having read what I painstakingly took the time to read instead of sleeping.

We have one opportunity to do this, for the best of our citizens, our relationship with Micron, and for the stability of the region. We need to do it right.

Regards,

Artesia Wagersreiter

## Volcko, Mary E.

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**From:** Artesia Wagersreiter <artwagers@protonmail.com>  
**Sent:** Monday, August 11, 2025 11:57 PM  
**To:** chipsnepa@chips.gov  
**Subject:** [EXTERNAL] Micron Public Comment.

### This message needs your attention

- This is a personal email address.
- This is their first email to your company.

Mark as Safe

Report Malicious or Mark Safe (click once)

Powered by Mimecast

Hello,

My name is Artesia. I'm a data analyst and a citizen of Syracuse concerned about the impacts of the Micron development of the health and safety of citizens of Syracuse and Onondaga county. Thank you for the opportunity to public comment. In case there is a concern, did not write any of this with AI and took the time and energy to learn about the topic and write it myself, so I would appreciate if my email was given the same attention.

I am writing to say that the draft does not adequately address how the Micron project will impact my community and CNY as a whole. Central New York deserves a facility that is well-built with the workers, citizens, and geography/environment all in mind, and one that will last for years to come. So far, Micron has done less than the bare minimum in terms of evaluating their planned spot and the many impacts it would have on the region. They have also provided a 45-day comment period – the federal minimum – to go over 20,000 pages of work, with a main body length of 700 pages. The working families who will be impacted by this project the most need more time to be made aware of the issue and be given fair opportunities to share their opinions. There needs to be a longer time available for public comment than less than two months in the middle of the summer when most people are on vacation mode, and I previously signed a petition stating the same. I imagine that Micron is hoping for a good relationship with our region, and doing things like this is getting off to a very bad start.

Here are my concerns:

- They need to disclose what chemicals are being used because the discharge is going into the river which is two miles away from where Onondaga drinking water is taken in. This county has already seen enough difficulty with poisoned drinking water, lakes, and building materials. It is abhorrent that Micron would be comfortable to do this, poisoning our entire region.
- The removal of that many trees, shrubs, and wetlands is going to pose a significant loss. At a time when we are seeing temperatures rising more than ever, we desperately need those natural resources to help mitigate the temperature rise and store CO2.

- The ground this is going to be built on is karst - there are gaps, it is notoriously porous, and sink holes on this land – where an impossibly heavy building is going to be – is not a question of “if” but “when.” I want this project to succeed, and not for the planned 16 years of construction – funded by taxpayers! – to be interrupted by a foreseeable event and for the entire project to be scrapped and abandoned, leaving us with the consequences, with no lasting or meaningful cost to Micron.
- At the point when sinkholes develop, any spills that do happen could spread underground, reaching other drinking sources like those who for folks who have wells. Micron did not even evaluate all of the bedrock that they are planning to build on, clearly demonstrating that they are not dedicated to ensuring that things are done right. We do not something this large to be a rushed job, done while everybody is still caught up in the good feelings of future economic prosperity – which won’t even reach us until 2040.
- The reports surrounding the aforementioned economic prosperity, however, appear inflated and unrealistic. While Micron says the average pay will be \$100,000 a year, averages are well-known to ironically be an inaccurate estimate of what is going on with the average worker. To get a true estimate of what we can expect workers to make, we would need the median and mode – or at least common salary ranges for workers. Additionally, \$100,000 means less and less with every year as inflation continues to rise, and they have provided no assurances that their pay will be kept with inflation or that the workers will be treated well.
- Furthermore, they claim to want to hire veterans and women but so far, not only have they not provided enforceable commitments, but their locations worldwide have partaken in aggressive union-busting techniques, which is particularly dangerous in an industry where many hazardous chemicals will be used – which have so far not been disclosed. A lot of talk has happened, but we have nothing to hold them to so that we can actually expect true reduction of poverty in Onondaga county.
- They are saying no more than 60 hours per work with no less than 1 day off per 7 days. Absolutely unacceptable, that is overwork for dangerous work and will kill at least one person. Our workers deserve no more than 50 hours per week with no less than 2 regular days off per 7 days. Having worked rotating shifts, I can confidently say that nobody can comfortably build a life or take care of their family – or even have a solid sleep schedule, which is paramount to being in good shape and working order to not make mistakes on the job – without having consistent hours and days off. Central new Yorkers deserve more.
- I don’t want Micron to have the impression that wetlands are just for environmental folks and hippies, because I feel that really is a smokescreen to hide behind what wetland removal really does, which is increasing flooding - which we’re already seeing more of as the weather gets less predictable. Instead of water being absorbed and filtered through wetlands, it’ll pick up any kind of chemicals or trash or oil or *whatever* from the area, and carry it into our water sources. There has been no detailed evaluation regarding managing stormwater runoff.
- Mature wetlands – ones that will actually reduce flooding, absorb CO2, and mitigate temperature – take a *long* time to develop. Manu decades. And no amount of creating new wetlands in other locations can fix what would be destroyed by building this on this location. Micron needs to find a different location. The soybean fields that supposedly would be made into wetlands – or other already-developed land parcels in the area - could be developed into the new location instead. Once they’re gone, they’re gone.

- I would like to also add that the tragedy of Allied Chemical and the failed Onondaga lake cleanup are still fresh in everybody's memory. I know people who saw the sludge pouring into the lake growing up. We still can't swim in what should be a pristine, glorious body of water that otherwise has the potential to draw people from miles around, especially with the mineral springs. Every time I see the lake, I'm reminded of how one single company and a handful of executives singlehandedly destroyed a whole water source for generations to come, poisoning those who swim in or eat from it – and with no accountability. While some remediation was done, it is nowhere near enough, and the standard of large companies coming into areas, wreaking environmental harm and hurting the residents, and then escaping accountability is almost expected at this point. It will take a lot to earn the trust of these residents, and the many oversights that have been made apparent with just the sliver of what I have read of this proposal (in the few *days* I was aware of it) are not doing anything to help anybody's fears. The benefits will take ages to see, but the negative impacts will be seen immediately.
- Any wetlands that would be created to “replace” what would be destroyed by the Micron development are first of all being proposed to be replaced at a 2:1 ration which is significantly below the standard 1:15 ratio for the industry, and second of all, would be in the hands of Micron. Which is not an environmental company, and I cannot expect that what Micron deems is “enough” – like what 3M has deemed is “enough” for lake Onondaga – would truly be enough and what central new Yorkers deserve.
- They're planning on burning a lot of natural gas annually, which would result in poor air quality for the area - and we already have terrible air quality right now. Central New York used to have dependably excellent air quality and that's quickly slipping away as well, as wildfires from the Canadian border drift across. I spent a bit less than four hours outside a few weeks ago – on a day when it was supposedly only unsafe for unhealthy groups, and I don't have anything wrong with my lungs – and I haven't been able to get rid of the cough since. I have to check the air quality before going outside now. How are our children's lungs being impacted by the smoke? How would the additional air pollution affect our children's health and chances of survival? Air pollution is a major killer worldwide, and Americans often don't think of it as something that impacts us, but we're seeing it more and more.
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center. I wouldn't want my children to be there, and I don't imagine you – whoever you are reading this – would, either.

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Please consider how you would feel if your friends, family, children were in this area. Had to look at a poisoned lake every day. If your children would possibly work at a company unwilling to disclose the extremely toxic and persistent chemicals that they would be working with on a daily basis.

Thank you for your time and for hopefully having read what I painstakingly took the time to read instead of sleeping.

We have one opportunity to do this, for the best of our citizens, our relationship with Micron, and for the stability of the region. We need to do it right.

Regards,

Artesia Wagersreiter

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**From:** Lisa Warnecke <lisa13210@gmail.com>  
**Sent:** Monday, August 11, 2025 5:55 PM  
**To:** chipsnepa@chips.gov  
**Cc:** Carol Johnson  
**Subject:** [EXTERNAL] Micron comments part 1

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To Whom it may concern:

Please accept the following comments on the DEIS for the Micron Manufacturing Project in Clay, New York. These comments are based on past experience as a local government official in Colorado many years ago. At the time, our locality was the closest municipality to a new electrical generating facility. I was the chief administrative official there for 3 years during construction, requiring me to address many impacts, and receive and implement grant funding to mitigate impacts at the time.

#### Review Time and Availability Concerns

It is disturbing that the public was only given 45 days to review an approximately 2 foot thick document. I have eyesight limitations, and the central library of the county, where the only hard copy was located, was closed for 2 weeks during the 45 day period due to air conditioning problems. The DEIS was inaccessible at that time. However when I asked Carol Johnson, the manager of our local library branch if she could get the DEIS hard copy, she kindly went and picked it up so it could be available at Petit Branch for this last week.

Clearly, the review time should have been extended or more hard copies should have been provided by the county, but also because over a 1000 residents submitted a petition requesting more time for public review. I understand the county government did not respond?

#### Public Safety and Emergency Management Concerns

The DEIS states that the proposed site will be served by the Onondaga Sheriff's Office and the Clay, and possibly the Cicero, Volunteer Fire Departments. However there is no mention in the document that I could find that any of these agencies were contacted to inquire and determine their capacity to respond to a wide variety of potential problems that could occur during construction and/or operations. I called the Sheriff's office today to ask if they reviewed the document after I read this text on Saturday, but did not receive a reply from them.

Questions certainly should be asked about the professional and size of the capacity of these agencies to respond in a timely manner to unique events that would not necessarily happen at other facilities in their service areas. There is no information that I could find in the DEIS if there is a substation of the Sheriff's office near by, or if one will be built and what organization will pay for it and when. I also wonder if the volunteer fire departments have had the full training in hazmats that should be available on a 24/7 basis. This is very difficult to accomplish with volunteer departments, particularly during normal business hours when many of the volunteers are at their paid jobs. I have 7 years experience working with volunteer fire departments when I was a town manager in Colorado and it was a huge problem during the day Mondays through Fridays.

I also wonder how the federal official Incident Command System (ICS) will be implemented if any event occurs. The New York State Police also is nearby. How will quick decisions be made in this regard? I have experience with law enforcement and fire debating who is in charge when we experienced a helicopter crash in one town.

More recently I served as a consultant to the Congressional Government Accountability Office (GAO) main office and the Congressionally authorized National Academy of Public Administration (NAPA), both in Washington DC, and to the Federal Emergency Management Agency (FEMA) before that about wildland fire management and other emergency management matters.

In all of our almost 10 studies, our teams repeated reported issues with debating response agencies, including with state and local governments, as continues to exist in many cases today. In all cases the importance of following ICS with appropriate protocols are needed. Nothing is mentioned in the DEIS about response responsibilities or timeliness on or near the site from what I could see in my brief review of the documents including appendices.

The only government that I read was contacted in the DEIS was the the Town of Clay in the appendix about the rail spur siting. It was curious that the New York State FOIL had to be used to acquire documentation in this regard? The document states that repeated phone calls and email messages to the Town of Clay were not replied to. Was an effort made for these consultants to go in person to the Clay offices? Were other nearby local governments contacted to inquire about potential impacts and professional capacity that might be impacted? No other localities were mentioned in the DEIS as being contacted that I could find, again in such a short review time period.

A wide variety of events could happen on or near the site during construction and operations that could require public safety, medical and/or fire response. In my experience, we certainly had increased calls for liquor establishments, including trying to enforce the fire codes. We experienced more fighting and vehicle accidents, along with dangerous driving conditions near these establishments. This area has many social issues due to the confluence of 2 major interstate highways and the proximity to Canada that could likely be exacerbated with this growth in people working here. We also have a high population of New Americans here that are known to be at risk of aggressive behavior.

Much more detail is needed about how these local governments will respond, especially when PILOT payments, if like property tax revenue, are lagged.

#### Transportation Concerns

Some local agencies were identified as being contacted somewhat regarding transportation to conduct extensive modeling work. However, I was surprised that the Syracuse Metropolitan Transportation Council (SMTC), the Official Federal Metropolitan Planning Organization for this region according to the US Department of Transportation, was apparently not contacted about their extensive work in this regard for the 5 county area.

Sections 3, and 4 for cumulative effects, discuss some high traffic problem areas for 5 interchanges. For them the DEIS states that these intersections are "unmitigatable" which the public safety and emergency management agencies should also ask how these intersections will accordingly impact response capabilities and times, particularly during rush hours. how were these interchanges considered in the modeling? It is difficult for the public to understand these impacts.

I do not understand why these intersections are termed "unmitigatable", and otherwise complicating many matters as well as increasing dangerous conditions. Much more detail and public meetings should be held in particular about these transportation and emergency management concerns.

Under transit, there is mention that Centro, the local transit agency, would run more buses to the micron facility. However, why doesn't Micron provide some of its own transportation so that less parking spots would be needed on the campus? Incentives could be offered for car pooling as well to reduce parking spots needed. There is much more text needed in the DEIS about modern methods to reduce traffic, improve safety and risk management, and reduce air pollution to benefit everyone in many ways.

Moreover, there are modern techniques that could be used by Onondaga County to help address such dangerous intersections and related matters, such as land acquisition through eminent domain to increase the safety and capacity of these intersections, and thereby improving emergency response times.

#### General concerns

It was also surprising that no mention of contact with the county Planning agency, SOCPA, was done to acquire any existing or planning data, including geodata which would improved the legibility of the maps presented in the beginning of the DEIS. Needing to use private sector (Esri) and state data seems very incomplete for such a large project and site. The county has Esri licences and data that should be used to better help readers understand the maps presented in the beginning of Section 3.

A land ownership and jurisdictional boundaries map is needed as well.

Cumulative effects, Section 4, is needing much more details about many matters. For example, broadband will certainly be impacted as would flood plains potentially. Much more information is needed to increase green space as with less parking spots as suggested above.

Thanks very much for considering these comments. Please also extend the comment period, improve the maps, and add some more public meetings about emergency preparedness and management.

Sincerely,

Lisa Warnecke, MBA PhD

**Archived:** Wednesday, August 13, 2025 11:41:28 AM

**From:** [Nicole Watts](#)

**Mail received time:** Mon, 11 Aug 2025 17:02:50

**Sent:** Monday, August 11, 2025 1:02:51 PM

**To:** [chipsnepa](#)

**Subject:** [EXTERNAL] Public Comment for Micron DEIS

**Importance:** Normal

**Sensitivity:** None

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To Whom It May Concern:

I wish to submit a public comment in regards to the Micron DEIS. While there are many elements of this impact statement that are outside of my expertise, I would like to see more information regarding the follow:

- \* Who is responsible for the handling of the impacted water related to Micron? I am extremely concerned about its usage of potable water in our region, and the storage of the contaminated water for the incredible length of time that will be required.
- \* What are the job commitments to ensure that this economic development prioritizes employing and strengthening our local economy to the best of its ability?
- \* What public/private partnership is being undertaken by Micron and impacted municipalities regarding the impacts on housing and transportation?

Sincerely,

Nicole

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Nicole Watts

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**From:** Bobbi Wilding <bobbi@cleanhealthyny.org>  
**Sent:** Monday, August 11, 2025 8:26 PM  
**To:** chipsnepa@chips.gov  
**Subject:** [EXTERNAL] Comments on Draft EIS for Micron facility in Clay, NY  
**Attachments:** C+H Micron DEIS comments 2025.docx.pdf

Good evening,

Please see attached comments regarding the draft EIS.

With gratitude,  
Bobbi

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Bobbi Wilding, MS (she/her/hers)  
Executive Director  
Clean+Healthy (formerly Clean and Healthy New York)  
69 State St., Suite 1400C, Albany, NY 12207  
O: 518-641-1552 ext.2  
C: 518-708-3875  
[www.cleanhealthyny.org](http://www.cleanhealthyny.org)  
Facebook: [@cleanhealthyny](https://www.facebook.com/cleanhealthyny)  
Twitter: [@cleanhealthyny](https://twitter.com/cleanhealthyny)

**Faster if we talk directly?** Schedule a time: <https://calendly.com/bobbi-chny>

~ Please support Clean+Healthy's work to build a just and healthy society in which toxic chemicals are unthinkable. We are 501(c)(3) tax-exempt. <https://www.chny.org/donate> ~



August 11, 2025

**Via Email**

Mr. Robert Petrovich  
Executive Director  
Onondaga County Industrial Development Agency  
335 Montgomery Street, Floor 2M  
Syracuse, New York 13202

Ms. Lynelle McKay  
Director  
C.H.I.P.S. Program Office  
National Institute of Standards and Technology  
100 Bureau Drive  
Gaithersburg, MD 20899

Re: Draft Environmental Impact Statement for Micron Semiconductor Manufacturing Project, Clay, NY

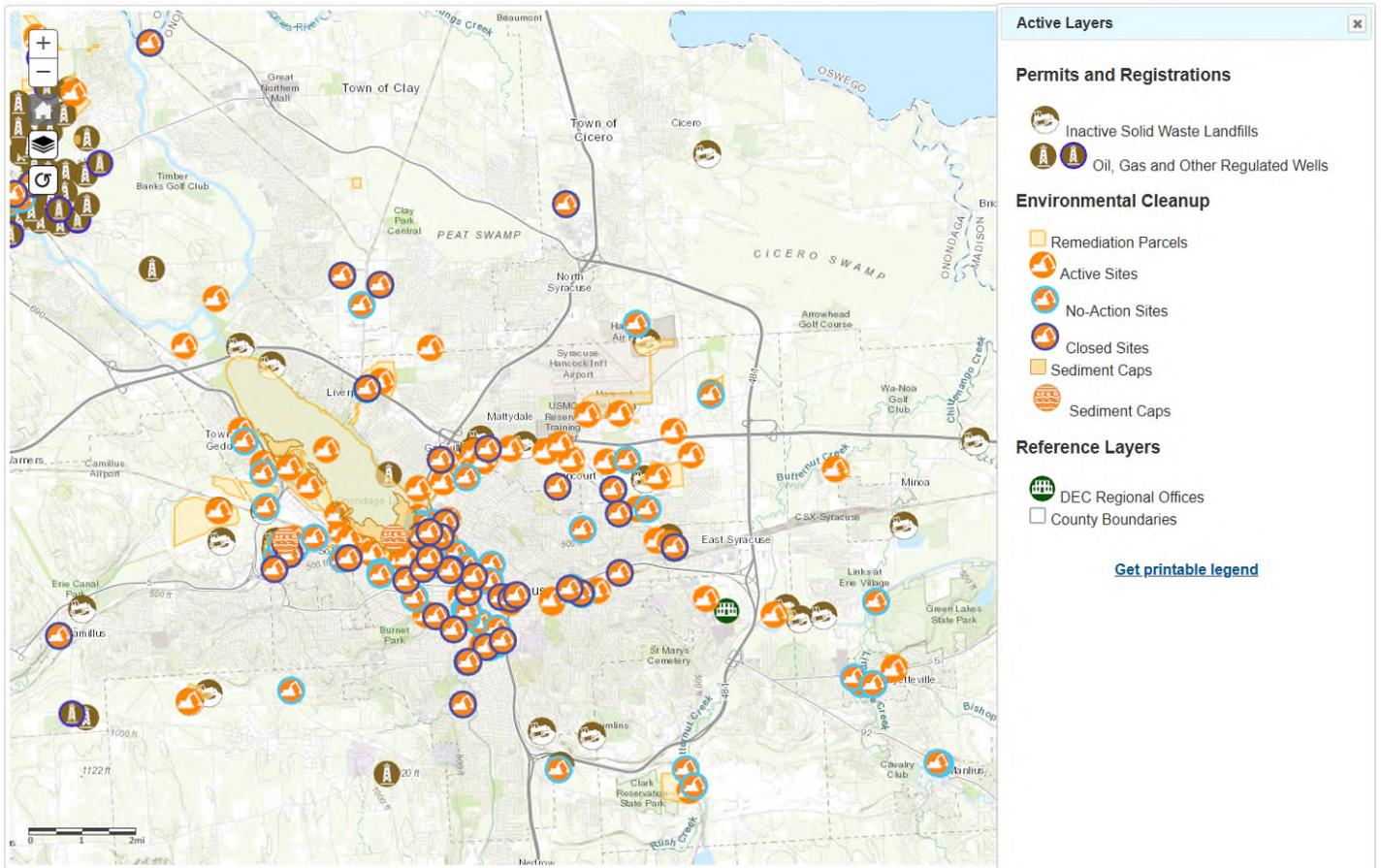
Dear Mr. Petrovich and Ms. McKay:

Clean+Healthy submits these comments on the Draft Environmental Impact Statement (“DEIS”) for the Micron Semiconductor Manufacturing Project in Clay, New York (the “Project”). Clean+Healthy is an environmental health nonprofit advocacy organization with a mission to build a just and healthy world where toxic chemicals are simply unthinkable. We co-lead the JustGreen Partnership, a statewide coalition working for environmental health and justice for New York’s people and communities.

We acknowledge that many upstate communities, built around historical rounds of industrial development, have been suffering economically from the movement of much product manufacturing to other parts of the world, especially Asia. We also recognize that those previous rounds of industrialization still leave their scars on the community with dozens of inactive hazardous waste sites in the greater Syracuse area alone. (See map on next page.<sup>1</sup>) Since that time, government regulations of the use and release of toxic chemicals have expanded, with the intention that they protect human health and the environment. However, the class of chemicals known as PFAS (per and polyfluoroalkyl substances) is currently not regulated in industrial uses as a class, with

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<sup>1</sup> NYS Department of Environmental Conservation *DECIInfo Locator* <https://gisservices.dec.ny.gov/gis/dil/> Add Environmental Cleanup sites to the map.



only a handful of chemicals in this broad class regulated in air, water, or soil. See below for further discussion of this.

**We are concerned that, without careful attention, the economic boon of the Micron plant could again bring the bust of high health care costs for employees and community residents, and long-term environmental harm. These chemicals comprise the focus of our comments.**

Clean+Healthy is part of the PFAS-Free NY campaign, which is focused on eliminating the harm caused by a dangerous class of toxic chemicals called per and polyfluoroalkyl substances (“PFAS”) from production, use, disposal and in the environment. This class of chemicals, which includes over 15,000 different chemical structures, are often referred to as “forever chemicals” because of their extreme persistence and ubiquity in the environment. It is estimated that PFAS contaminate up to 45% of the nation’s tap water and are found in the blood of nearly the entire U.S. population.<sup>2</sup>

PFAS contamination has spread across the world, harming countless people and species.<sup>3</sup> The health risks associated with PFAS are well established and broadly recognized by international scientific

<sup>2</sup> *Tap Water Study Detected PFAS ‘Forever Chemicals’ Across the US*, U.S. Geological Survey (July 5, 2023) (“USGS News Release”),

<https://www.usgs.gov/news/national-news-release/tap-water-study-detects-pfas-forever-chemicals-across-us>;

Julianne Cook Botelho et al., *Per- and Polyfluoroalkyl Substances (PFAS) Exposure in the U.S. Population: NHANES 1999–March 2020*, 270 *Env’t Res. Art. No. 120916* (Apr. 2025), <https://doi.org/10.1016/j.envres.2025.120916>.

<sup>3</sup> Searchlight New Mexico, *Toxic timeline: A Brief History of PFAS* (Feb. 19, 2019),

<https://searchlightnm.org/toxic-timeline-a-brief-history-of-pfas/>.

organizations,<sup>4</sup> federal and state regulatory agencies,<sup>5</sup> and other leading scientific bodies.<sup>6</sup> Many PFAS are associated with “significant and diverse” adverse health effects that include cancer, liver disease, decreased fertility, high cholesterol, reduced vaccine response, and more.<sup>7</sup> Clean+Healthy is concerned enough about this class of chemicals that we issued our own white paper on the topic: *PFAS: The Meaning of Forever*.<sup>8</sup>

New York is already experiencing the impacts from PFAS. Millions of New Yorkers are living with the legacy of unregulated PFAS releases.<sup>9</sup> Almost half of New York’s public drinking water systems are contaminated by PFAS, and more than two-thirds of the inactive landfills in the state leach unsafe levels of PFOA, PFOS, or both into groundwater impacting private well owners.<sup>10</sup> In addition, PFAS already contaminates multiple sites in the vicinity of the Project, increasing the potential for cumulative exposures. There is known PFAS contamination at the Hancock Field Air National Guard Base in Syracuse.<sup>11</sup> There is suspected PFAS contamination at the Oak Orchard Wastewater Treatment Plant site, where Micron intends to build the Project’s new industrial wastewater treatment facility.<sup>12</sup> And there are multiple facilities in the area that are suspected of using or having used PFAS, including two airfields immediately south of the Project site.<sup>13</sup>

With PFAS already costing the state up to \$4.4 billion in annual health care costs and millions in drinking water treatment and site remediation, New Yorkers cannot afford for this Project to worsen

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<sup>4</sup> See IARC:

<https://publications.iarc.who.int/Book-And-Report-Series/Iarc-Monographs-On-The-Identification-Of-Carcinogenic-Hazards-To-Humans/Perfluorooctanoic-Acid-PFOA-And-Perfluorooctanesulfonic-Acid-PFOS--2025>

United Nations Env’t Programme, *Risk Profile on Pentadecafluorooctanoic Acid (PFOA, Perfluorooctanoic Acid), its Salts and PFOA-related Compounds*, Addendum to Report of the Persistent Organic Pollutants Review Committee on the Work of Its Twelfth Meeting, UNEP/POPS/POPRC.12/11/Add.2, at 24–26 (Sept. 2016),

<http://chm.pops.int/Portals/0/download.aspx?d=UNEP-POPS-POPRC.12-11-Add.2.English.PDF>.

<sup>5</sup> Agency for Toxic Substances & Disease Registry, *Toxicological Profile for Perfluoroalkyls 4–21*, 26–29 (May 2021) (“PFAS Tox. Profile”), <https://www.atsdr.cdc.gov/toxprofiles/tp200.pdf>; Off. of Env’t Health Hazard Assessment, Cal. Env’t Protection Agency, *Public Health Goals: Perfluorooctanoic Acid and Perfluorooctane Sulfonic Acid in Drinking Water (First Public Review Draft)* 62–166 (July 2021), <https://oehha.ca.gov/sites/default/files/media/downloads/crn/pfoapfosphgdraft061021.pdf>.

<sup>6</sup> Nat’l Acad. of Sci., Eng’g, & Med., *Guidance on PFAS Exposure, Testing, and Clinical Follow-Up* 6–8 (Nat’l Acad. Press 2022), <https://nap.nationalacademies.org/catalog/26156/guidance-on-pfas-exposure-testing-and-clinical-follow-up> (click “Download Free PDF”); see also Arlene Blum et al., *The Madrid Statement on Poly- and Perfluoroalkyl Substances (PFASs)*, 123 *Env’t Health Persp.* A107, A107 (2015), <https://ehp.niehs.nih.gov/doi/epdf/10.1289/ehp.1509934> (releasing statement of more than 250 scientists expressing “concern[] about the production and release into the environment of an increasing number of [PFAS]”).

<sup>7</sup> 88 Fed. Reg. at 18,643; EPA, *Our Current Understanding of the Human Health and Environmental Risks of PFAS*, <https://www.epa.gov/pfas/our-current-understanding-human-health-and-environmental-risks-pfas>.

<sup>8</sup> Clean+Healthy, *PFAS: The Meaning of Forever (2025)* <https://static1.squarespace.com/static/62f48f662276bf51c7402708/t/682de9d0ab9e73239625797e/1747839647444/PFAS-The+Meaning+of+Forever+May+2025.pdf>

<sup>9</sup> There are several PFAS impacted communities across New York including Hoosick Falls, Newburgh, Petersburg, Long Island, Rockland County, Buffalo, and Syracuse: <https://storymaps.arcgis.com/stories/f3b905cc113c4b94911283716a7b583d>

<sup>10</sup> NYS Department of Environmental Conservation, *Inactive Landfill Initiative | Comprehensive Mitigation & Remediation Plan* (July 2025) [https://dec.ny.gov/sites/default/files/2025-07/inactivelandfillrpt2025\\_0.pdf](https://dec.ny.gov/sites/default/files/2025-07/inactivelandfillrpt2025_0.pdf)

<sup>11</sup> Air National Guard, *Final Site Inspection Report Air National Guard Phase II Regional Site Inspections for Per and Polyfluoroalkyl Substances Hancock Field Air National Guard Base Syracuse, New York at ES-3 to ES-4* (Mar. 2019), <https://extapps.dec.ny.gov/data/DecDocs/734054/Report.HW.734054.2019-03-07.PFAS%20SI.pdf>

<sup>12</sup> PFAS Exchange, *PFAS Sites and Community Resources: An Interactive Mapping Project from the PFAS-REACH Team*, [https://experience.arcgis.com/experience/12412ab41b3141598e0bb48523a7c940/page/Page-1?views=Presumptive-Contamination#data\\_s=id%3AdataSource\\_18-1926810e7cf-layer-5%3A445](https://experience.arcgis.com/experience/12412ab41b3141598e0bb48523a7c940/page/Page-1?views=Presumptive-Contamination#data_s=id%3AdataSource_18-1926810e7cf-layer-5%3A445)

<sup>13</sup> *Id.*; see also DEIS, Appendix K: Phase I Environmental Site Assessment Main Campus East, Childcare Site, Utility Infrastructure/Rail Spur Site at 9 (Feb. 2024).

the New York PFAS crisis.<sup>14</sup> Instead, the Project should be a model of sustainable semiconductor production, and a demonstration that domestic microchip production need not come at the expense of our health and the environment.

A necessary first step towards responsible semiconductor manufacturing is a comprehensive analysis of the environmental and social impacts of proposed manufacturing projects. Unfortunately, the Project's DEIS does not provide enough detail on Micron's use, disposal, and release of PFAS for the public to understand the Project's environmental and human health impacts. Because the scope and severity of the anticipated impacts are not disclosed, the mitigation needed to ensure health protective control of PFAS at the proposed facility remains unclear.

### ***DEIS must rely on the science-based definition of the PFAS class***

A threshold point for the DEIS, it must rely on a science-based class definition of PFAS. As acknowledged in the DEIS, the assessment and regulation of PFAS "depend[s]" in large part "on the definition of PFAS applied."<sup>15</sup> The New York Legislature,<sup>16</sup> United States Congress,<sup>17</sup> more than 100 leading scientists,<sup>18</sup> and 16 state attorneys general<sup>19</sup> have all defined PFAS as a class of chemicals containing "at least one fully fluorinated carbon [atom]." This definition has broad scientific support, since it is the presence of a fully fluorinated carbon that gives PFAS their common trait of persistence. We urge the project proponents to rely on this science-based PFAS definition, which is already enshrined in multiple provisions of New York State law.

While EPA claims to define the PFAS class on a "case-by-case basis," as opposed to relying on a single consistent definition, prior EPA definitions have excluded thousands of PFAS recognized by the Organisation for Economic Co-operation and Development ("OECD"), New York State, and others.<sup>20</sup> These exclusions have no scientific basis, and if applied to semiconductor manufacturing many PFAS would be excluded that are used or formed during production. For instance, EPA's prior definitions did not include polyvinylidene fluoride ("PVDF"), a PFAS used in semiconductor manufacturing,<sup>21</sup> or trifluoroacetic acid ("TFA"), which forms when the fluorinated gasses used to make semiconductors

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<sup>14</sup> NRDC, The Social Burden of PFAS "Forever Chemicals" in New York (June 9, 2025), <https://www.nrdc.org/media/social-burden-pfas-forever-chemicals-new-york>.

<sup>15</sup> DEIS at 3-239.

<sup>16</sup> See, e.g., NY ECL §§ 37-0203(6), 37-0101(7), 27-3301(8); NY Gen. Bus. Law § 391-u(1)(f).

<sup>17</sup> See, e.g., Nat'l Def. Authorization Act for Fiscal Year 2020, Pub. L. No. 116-92, § 332(c)(3), 133 Stat. 1198, 1314 (2019) (defining PFAS as "substances that are man-made chemicals with at least one fully fluorinated carbon atom"); see also *id.* § 329(b)(2), 133 Stat. at 1312 (defining "polyfluoroalkyl substance" as "a man-made chemical containing a mix of fully fluorinated carbon atoms, partially fluorinated carbon atoms, and nonfluorinated carbon atoms").

<sup>18</sup> *Scientists' Statement on Defining PFAS 1*, Safer States (May 7, 2024), <https://www.saferstates.org/wp-content/uploads/Scientists-Statement-on-Defining-PFAS.pdf>

<sup>19</sup> State Attorneys of New Jersey et al., Comments on TSCA Section 8(a)(7) Reporting and Recordkeeping Requirements for Perfluoroalkyl and Polyfluoroalkyl Substances (PFAS), Docket No. EPA-HQ-OPPT-2020-0549-0092 at 10, 14 (Sept. 27, 2021), <https://www.regulations.gov/comment/EPA-HQ-OPPT-2020-0549-0086>.

<sup>20</sup> Tom Perkins, *EPA's new definition of PFAS could omit thousands of 'forever chemicals'*, The Guardian (Aug. 18, 2023), <https://www.theguardian.com/environment/2023/aug/18/epa-new-definition-pfas-forever-chemicals>.

<sup>21</sup> National Institute of Standards and Technology CHIPS Program Office, Final Programmatic Environmental Assessment for Modernization and Expansion of Existing Semiconductor Fabrication Facilities under the CHIPS Incentives Program ("Programmatic EA") at C-25 (June 28, 2024), <https://www.nist.gov/system/files/documents/2024/06/28/Final%20PEA%20for%20Modernization%20and%20Expansion%20of%20Semiconductor%20Fabs%206-28-2024%20-%20OGC-508C.pdf>.

break down in the environment.<sup>22</sup> To fully assess the Project's PFAS impacts, the DEIS must use a definition that encompasses the full PFAS class.

***DEIS must discuss Micron's use and discharge of PFAS chemicals***

PFAS are widely used during the production of semiconductors,<sup>23</sup> and while PFOA has predominately been phased out, semiconductor plants continue to use "short-chain" PFAS,<sup>24</sup> which are often associated with the same types of health effects as the long-chain PFAS they are used to replace.<sup>25</sup> PFAS in wastewater discharges has been detected at other facilities producing semiconductors. Based on information obtained from Global Foundries semiconductor manufacturing facility in Essex Junction, Vermont, at least 17 different PFAS have been detected in the wastewater discharged. Up to 78,000 parts-per-trillion of PFAS were detected in another domestic semiconductor plant's wastewater.<sup>26</sup>

The DEIS does not identify which PFAS Micron will use or specify how Micron plans to treat and dispose of its PFAS-containing waste. It only offers noncommittal assurances that PFAS concerns will be handled in future permitting processes, deferring the evaluation and mitigation of significant adverse impacts without any certainty that such permits would even address PFAS releases. This is an unacceptable level of detail given the serious risks PFAS pose and the knowledge that PFAS will be used at the proposed facility.<sup>27</sup> This approach is problematic and not protective, because New York does not sufficiently regulate PFAS as a class in permitting industrial facilities (DEC only regulates PFOA and PFOS). This regulatory gap gives no assurance that PFAS will not be permitted to be released into the environment.

The environmental analysis must identify the specific PFAS proposed to be used at the facility; how those PFAS would be used; available alternatives that meet requirements, and all anticipated releases via air emissions and surface and wastewater discharges, including discharges from the Project's industrial wastewater treatment plant ("IWWTP"). The Final EIS must incorporate mitigation measures to require safer, non-PFAS alternatives wherever available and specify permitting conditions that prohibit the release of PFAS used at the Micron facility. It should also require Micron to evaluate alternative techniques, materials, and technologies that would eliminate the need for PFAS chemicals that emerge during the projected 16-year construction timeline; new solutions are being developed and the final portions of the project should not rely on the available solutions of 2025.<sup>28</sup>

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<sup>22</sup> *Id.*

<sup>23</sup> Programmatic EA at C-13 to C-15.

<sup>24</sup> Joint Statement of the 28<sup>th</sup> Meeting of the World Semiconductor Council (June 6, 2024),

<https://www.semiconductorcouncil.org/wp-content/uploads/2024/06/2024-WSC-Joint-Statement-FINAL.pdf#page=6>

<sup>25</sup> Cheryl Hogue, *Short-Chain and Long-Chain PFAS Show Similar Toxicity, US National Toxicology Program Says*, Chem. & Eng'g News (Aug. 24, 2019), <https://cen.acs.org/environment/persistentpollutants/Short-chain-long-chain-PFAS/97/i33>; Carol F. Kwiatkowski et al., *Scientific Basis for Managing PFAS as a Chemical Class*, 7 Env't Sci. & Tech. Letters 532 (2020).

<sup>26</sup> Tom Perkins, *US environmental agency fast-tracking new PFAS approvals for semiconductors*, The Guardian (Dec. 19, 2024), <https://www.theguardian.com/us-news/2024/dec/19/epa-pfas-approvals-semiconductors>.

<sup>27</sup> DEIS at 3-239; *see supra* II.A-II.C.

<sup>28</sup> The NYS Pollution Prevention Institute has been working with companies to identify safer solutions that go beyond regulatory requirements, including regarding the use of PFAS in manufacturing. They should be consulted on this project, [nysp2i.rit.edu](https://nysp2i.rit.edu); the Toxic Use Reduction Institute at UMass Lowell has also worked with companies, including in the semiconductor space, to identify safer solutions to PFAS use, and have access to technologies covered by confidential business information that are safer

### ***DEIS must discuss Micron's PFAS Air Emissions***

The DEIS acknowledges that Micron will use and release fluorinated gasses (“F-gasses”), with almost 2.5 tons of projected “fluorides” emissions from fabs 1 and 2 alone.<sup>29</sup> But the DEIS overlooks the fact that many F-gasses are themselves PFAS or PFAS-precursors, the adverse impacts of which extend far beyond their contribution to climate change.

F-gasses comprise more than 60 percent of the world’s annual PFAS emissions.<sup>30</sup> In the environment, most F-gasses degrade into trifluoroacetic acid (“TFA”), one of the most prevalent PFAS.<sup>31</sup> In addition to its high persistence, TFA is associated with developmental toxicity<sup>32</sup> and liver and thyroid harm.<sup>33</sup> TFA is ubiquitous in the environment and extremely difficult to control, since “methods to remove TFA from water are expensive and often inefficient due to TFA’s persistence and mobility.”<sup>34</sup> Here, not only does the DEIS fail to mention TFA, but the County “never considered the potential impacts of the Project’s [F-gas] emissions at all.”<sup>35</sup> “

The DEIS fails to discuss the limitations of thermal treatment options for PFAS, which resist thermal degradation. Despite industry’s claims of high PFAS destruction rates, recent air sampling around a Chemours thermal oxidizer in North Carolina detected high levels of PFAS.<sup>36</sup> Air permits for existing Micron facilities do not address PFAS air emissions,<sup>37</sup> and the DEIS contains “no ‘reasoned elaboration’ as to why . . . the issuance of a state facility permit . . . would result in no significant adverse environmental impact from the project’s air emissions.”<sup>38</sup> The final EIS must consider the Project’s PFAS air emissions and impose specific mitigation measures to address PFAS air emissions in subsequent state permits.

### ***DEIS must discuss Micron's disposal of PFAS chemicals***

Their unique chemical structure also makes PFAS difficult to treat and dangerous to dispose of. Conventional wastewater treatment processes will remove some, but not all PFAS, especially the short-chain PFAS that are most widely used in semiconductor manufacturing.<sup>39</sup> Even the successful removal of PFAS from wastewater creates waste products – such as spent carbon filters or reverse

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than PFAS. They should also be consulted. For example:

<https://www.turi.org/transene-company-eliminates-its-use-of-pfas-and-saves-money-case-study-2023>

<sup>29</sup> DEIS at 3-165, 3-183.

<sup>30</sup> ChemSec, *F-gases unveiled as primary contributors to the PFAS pollution crisis* (May 16, 2024),

<https://chemsec.org/f-gases-unveiled-as-primary-contributors-to-the-pfas-pollution-crisis/>.

<sup>31</sup> *Id.*

<sup>32</sup> U.K. Health & Safety Exec., *Analysis of the Most Appropriate Regulatory Management Options (RMOA)* 107 (Mar. 2023),

<https://www.hse.gov.uk/reach/assets/docs/pfas-rmoa.pdf>.

<sup>33</sup> ATMosphere, *The Rising Threat of HFOs and TFA to Health and the Environment* 11 (Oct. 2022),

[https://issuu.com/shecco/docs/2022\\_atmo\\_hfo\\_tfa\\_report](https://issuu.com/shecco/docs/2022_atmo_hfo_tfa_report).

<sup>34</sup> Arp H.P.H. et al., *The Global Threat from the Irreversible Accumulation of Trifluoroacetic Acid (TFA)*, 12 *Env’t Sci. & Tech.* 19925 (2024), <https://pmc.ncbi.nlm.nih.gov/articles/PMC11562725/>.

<sup>35</sup> *Clean Air Action Network of Glens Falls, Inc. v. Town of Moreau Plan. Bd.*, 235 A.D.3d 1124, 1128 (3d Dep’t 2025).

<sup>36</sup> <https://www.theguardian.com/us-news/2024/jan/28/north-carolina-pfas-forever-chemicals-testing>

<sup>37</sup> <https://www2.deq.idaho.gov/admin/LEIA/api/document/download/9609>

<sup>38</sup> See, e.g., <https://www2.deq.idaho.gov/admin/LEIA/api/document/download/9609>

<sup>39</sup> EPA, *Technologies for Reducing PFAS in Drinking Water at 1* (2019),

[https://www.epa.gov/sites/default/files/2019-10/documents/pfas\\_drinking\\_water\\_treatment\\_technology\\_options\\_fact\\_sheet\\_04182019.pdf](https://www.epa.gov/sites/default/files/2019-10/documents/pfas_drinking_water_treatment_technology_options_fact_sheet_04182019.pdf) (“[S]horter chain PFAS like perfluorobutanesulfonic acid (PFBS) and perfluorobutyrate (PFBA) do not adsorb as well [to GAC filters] resulting in earlier breakthrough”);

osmosis concentrate – with high PFAS concentrations.<sup>40</sup> The disposal of these treatment residuals presents further problems, since traditional means of waste disposal do not effectively contain or destroy PFAS.

The incineration of PFAS waste presents similar concerns. PFAS are widely used in firefighting foam precisely because they do not break down when burned. Those same properties make PFAS extremely difficult to incinerate, and EPA has acknowledged that “the effectiveness of incineration to destroy PFAS compounds ... is not well understood.”<sup>41</sup> The incomplete combustion of PFAS “can result in the formation of smaller PFAS,” as well as other toxic chemicals like hydrogen fluoride. These products of incomplete combustion are then released with any residual PFAS via the incinerator’s air emissions, “spread[ing] them into surrounding areas.”<sup>42</sup> The final EIS must consider the Project’s PFAS disposal and impose specific mitigation measures to ensure disposal.

### ***Micron Fails to Commit to Any Concrete PFAS Mitigation Measures***

The DEIS must identify practicable PFAS mitigation measures. As described above, there are significant gaps in the DEIS analysis in respect to PFAS air or water releases, and wastes, and the DEIS commits only to compliance with future administrative processes and regulations.

Below are a non-exhaustive list of mitigation measures that are needed to “minimize or avoid” the significant adverse effects associated with PFAS. These mitigation measures should be enshrined as conditions to facility permits (e.g., SPDES, Title V).

- **Monitoring:** Significant monitoring protocols should be employed to monitor the Project’s impacts and identify potential PFAS releases using EPA-approved methods that cover the greatest range of detectable PFAS. This monitoring should include monitoring of water discharges (surface and wastewater, before and after pretreatment), air emissions. Micron should fund the quarterly monitoring of PFAS in the influent, effluent and biosolids from the Industrial Wastewater Treatment Plant at the Oak Orchard Site (“IWWTP”).
- **Minimization:** Micron should be required to conduct a PFAS Alternatives Assessment to evaluate the specific PFAS that are known, intended, or reasonably foreseen to be used on site; the respective functions of such PFAS; and whether such PFAS can be reduced or eliminated. The PFAS Alternatives Assessment shall be made public on a dedicated, easy-to-find webpage. Micron should also be required to use less hazardous, non-PFAS alternatives wherever practicable, and prepare an annual report on its actions taken to reduce or eliminate PFAS use.

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<sup>40</sup> John Wiegand, *The Race to Destroy PFAS, the Forever Chemicals*, MIT Tech. R. (Oct. 26, 2023), <https://www.technologyreview.com/2023/10/26/1082292/the-race-to-destroy-pfas-the-forever-chemicals/> (“Byproducts such as filters used to capture PFAS do not make the chemicals go away: often “[t]he filters are discarded or chemically washed for reuse, and the notoriously clingy PFAS reenter the environment through landfills and wastewater.”).

<sup>41</sup> EPA, Technical Brief, *Per- and Polyfluoroalkyl Substances (PFAS): Incineration to Manage PFAS Waste Streams 1* (2019), [https://www.epa.gov/sites/default/files/2019-09/documents/technical\\_brief\\_pfas\\_incineration\\_ioaa\\_approved\\_final\\_july\\_2019.pdf](https://www.epa.gov/sites/default/files/2019-09/documents/technical_brief_pfas_incineration_ioaa_approved_final_july_2019.pdf)

<sup>42</sup> Cheryl Hogue, *Incineration May Spread, Not Break Down PFAS*, Chem. & Eng’g News (Apr. 27, 2020), <https://cen.acs.org/environment/persistent-pollutants/incinerators-spread-break-down-PFAS/98/web/2020/04> (describing elevated PFAS levels in the soil around a Cohoes, New York incinerator); Noémi Brunschwiler, TNO, *Tracing Sources of Diffuse PFAS Contamination in Soil Near A Waste Incineration Plant* (June 30, 2023), <https://publications.tno.nl/publication/34641491/gr1mfT/TNO-2023-S11566.pdf> (reporting elevated PFAS levels in soil downwind of a Netherlands waste incinerator and concluding “the waste incinerator was . . . likely a substantial contributor to the observed PFAS content”).

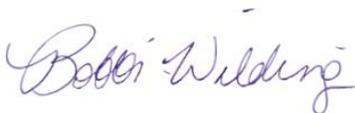
- **Pretreatment:** The Onondaga County Department of Water Environment Protection (“OCDWEP”) should be required to implement a Pretreatment Program for discharges to the Project’s IWWTP, in accordance with Clean Water Act regulations.<sup>43</sup> Such a pretreatment program shall prohibit the discharge to surface or groundwater of any wastewater containing any detectable PFAS to the IWWTP.
- **Other measures:** The SPDES permits issued to Micron and the IWWTP shall include effluent limitations and/or new source performance standards for all PFAS that Micron knows or foresees will be discharged from the facility, including degradation byproducts that are PFAS. Consistent with New York and federal law, if neither EPA nor New York has developed effluent limitations, standards, or guidance values for a PFAS that Micron foresees discharging, DEC should develop the effluent limitations and/or standards based on the best available technologies economically achievable using its best professional judgment.<sup>44</sup> The SPDES permit issued to the IWWTP shall prohibit the land application of biosolids.

## Conclusion

We urge Project Proponent and other involved agencies to fully evaluate the Project’s PFAS impacts, to consider feasible alternatives and mitigation measures, and to require mitigation that eliminates significant adverse impacts by preventing PFAS releases and exposures.

The current DEIS inappropriately defers PFAS impacts and lacks sufficient assurances to protect the community and New York’s environment. The Project should be a model of sustainable semiconductor production, and a demonstration that domestic microchip production need not worsen the nation’s PFAS contamination crisis. The final EIS should require mitigation that eliminates significant adverse impacts by preventing PFAS releases and exposures.

Respectfully submitted,



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<sup>43</sup> 40 C.F.R. 40 C.F.R. § 403.8(a).

<sup>44</sup> 40 C.F.R. §§ 125.3(a)(2)(ii)-(v) (all non-POTW permits must, at a minimum, contain BAT effluent limitations based on best professional judgment); 40 C.F.R. § 122.44(a)(1) (all NPDES permits must include technology based effluent limitations and standards, including “case-by-case effluent limitations” when others are not available); 33 U.S.C. § 1342(a)(1)(B).

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**From:** Larry Young <larrysyr25@gmail.com>  
**Sent:** Monday, August 11, 2025 11:11 AM  
**To:** chipsnepa@chips.gov  
**Subject:** [EXTERNAL] Micron DEIS Comments

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My name is Laurence Young

I am a resident of the Town of Cicero

Address: PO Box 23  
Brewerton, NY 13029

Email: [larrysyr@yahoo.com](mailto:larrysyr@yahoo.com)

## COMMENTS

### #1 of 2

Traffic Analysis, Page 3-325

The DEIS indicates that there will be no traffic mitigation completed by 2027, yet the project will impose a significant worsening of traffic along the Route 31 corridor, especially during the afternoon rush hours. This represents a major external cost being imposed on the residents of Clay and Cicero.

The intersections along Route 31 between Route 11 and Thompson Road are currently significantly congested, and the DEIS proposes increasing traffic in that area without any increase in the capacity of the roads. Micron and OCIDA need to increase the capacity of these roads *before* adding traffic. The delay to the start of construction will be offset by the efficiencies of better traffic flow. Additionally, the railroad spur at Caughdenoy Road should be completed before fill is transported to the construction site.

At a minimum, the proposed new interchanges on Route 81 at Sneller Road should be constructed first in order to divert traffic from the Route 31 intersections.

The DEIS only analyzes traffic during the morning rush hour - 6AM to 8AM and the evening rush hour 4PM to 6PM. This is insufficient to capture the full effect the project will have on the residents of this area. The schools in the area add traffic at earlier hours in the afternoon, leading to significant congestion at hours not considered in the DEIS.

The project is complex and requires more coordination among various agencies, including NYSDOT and the Towns of Clay and Cicero. It is not acceptable to simply declare road improvements not possible in the near term while creating significant additional traffic congestion.

**#2 of 2**

Time Frame for comments

The DEIS was published with a comment period of 45 days, the minimum allowed under the law.

This creates the impression that the agencies want to limit input from the public regarding this project.

The Micron project promises to transform the Clay and Cicero areas into an entirely different character from the present. The impacts on residents and businesses will be enormous. The comment period must be extended to give the public a chance to absorb and react to an enormous report which the agencies needed 3 years to complete.

Laurence Young

*August 11, 2025*

Robert M. Petrovich  
Deputy County Executive-Onondaga County  
Economic Development & Planning  
Executive Director-Onondaga County Industrial Development Agency  
421 Montgomery Street-14th Floor  
Syracuse, New York 13202

David Frenkel  
Environmental Division Director  
CHIPS for America  
U.S. Department of Commerce

Dear Robert & David:

I am submitting this comment for the public record on behalf of Empire State Development (ESD), the state's chief economic development agency, an involved agency in the preparation of the Environmental Impact Statement by the Onondaga County Industrial Development Agency as Lead Agency under New York's State Environmental Quality Review Act. The aim of this comment is to highlight the robust community engagement and ambitious commitments to Central New York communities that ESD and Micron have undertaken around this project.

Micron's \$100 billion investment in Central New York will bring transformative growth to the region and has the potential to reshape the economic trajectory of the entire state. This project will create more than 50,000 New York jobs, including tens of thousands of construction jobs, and put Central New York at the forefront of an advanced manufacturing renaissance. Under Governor Hochul's leadership, ESD is realizing major investments and partnering with Micron to ensure that the benefits of this historic investment are felt equitably and that Central New York communities have a hand in shaping this coming growth.

This unprecedented investment was made possible by New York's Green CHIPS Program, championed and signed into law by Governor Hochul and overseen by ESD, which requires ambitious sustainability and community commitments. These commitments include investments that support local workforce development and the host community, including training and education programs to expand employment opportunity for economically disadvantaged individuals.

As part of the project agreement, Micron CEO Sanjay Mehrotra and Governor Hochul signed a Community Investment Framework in October 2022. In the agreement, Micron & New York State made strong commitments to community and sustainability including:

- The establishment of a \$500 million Community Investment Fund and the creation of a Community Engagement Committee made up of local stakeholders work with Micron to support ongoing community engagement, help to recommend community investment grants to be made from Micron's contribution to the Green CHIPS Community Investment Fund, and support implementation framework and monitoring of the overall and subsequent Green CHIPS Community Plan between Micron and ESD.
- A commitment to volunteering and giving in Central New York communities. The company pledged to provide two days paid volunteer time per year for each team member; volunteer opportunities may include serving in community-based organizations.
- Micron also agreed to set diverse hiring and contracting goals; sustainability requirements; and other community investments.

Since then, ESD and Micron have been working, in partnership with the community, to realize these commitments.

### **Green CHIPS Community Investment Fund & the Central New York Community Engagement Committee**

In April 2023, Governor Hochul announced the formation of the Central New York Community Engagement Committee made up of local stakeholders to ensure meaningful, ground-up participation and discussion of Micron's implementation and investments in the region.

In their first year, the Committee engaged nearly 13,000 Central New Yorkers in public hearings, focus groups, one-on-one-interviews, and online surveys to identify and compile local priorities for inclusive growth and benefits to the greater Central New York region. These engagements included:

- Public events and meetings attended by over a thousand Central New Yorkers
- Canvassing efforts in communities across the region
- Presentations both online and in person
- Focus groups targeted at diverse and underrepresented groups
- Digital engagements, including regular mass emails, online surveys, and a website available in both Spanish and English

The Committee reviewed and analyzed these engagements at monthly meetings, adapting and refining their outreach efforts to strive for a comprehensive representation of the region's diverse communities and ensure that the voices of underrepresented and

marginalized groups were heard and integrated into the planning process. To ensure inclusivity, the Committee provided materials in Spanish and employed bilingual facilitators to address language barriers. 12,734 residents and over 316 local organizations participated in the Committee's engagement efforts.

The Committee's findings were published in the [Community Priorities Document](#) (CPD) published in June 2024. The CPD represents a critical strategic framework to help guide the \$500 million Green CHIPS Community Investment Fund (CIF) towards the community's most pressing needs and aspirations. The CIF was created in partnership with ESD with Micron contributing at least \$250 million, ESD contributing \$100 million, and the remaining funding being raised from local, statewide and national partners.

In the CPD, the Committee identified immediate priority areas including education, workforce development, supports for minority, women, and veteran-owned small businesses, housing, and childcare.

The first round of applications for the CIF closed in January 2025 with initial awards expected to be announced in the near future. Beyond the CIF, Micron and New York State are already making major investments aligned with the priorities identified by the community in workforce development, education, housing, support for small and diverse businesses, and workforce development.

Recognizing that the Micron project is a generational opportunity, the \$500 million CIF is designed to be spent over the course of the next two decades. The Committee continues and will continue to meet regularly and engage the public and revisit the CPD as needed to ensure that it continues to reflect the changing needs and perspectives of Central New Yorkers throughout the duration of the CIF.

### **Diverse Contracting Goals**

In the Community Investment Framework agreed to by Micron and New York State, Micron committed to use good faith efforts to achieve 30% of eligible construction spend from eligible categories with businesses owned by socially and economically disadvantaged individuals (SEDI). Micron is partnering with ESD to identify business and industry specific skills that could benefit the small businesses who are interested in these opportunities and help them with navigating through existing and new resources, such as gaining access to capital and bonding.

Building Micron's campus will generate hundreds of millions of dollars' worth of contracts that SEDI-owned firms in New York are able to pursue. Micron and ESD are collaborating to develop a dynamic database of ready, willing, and able SEDI-owned businesses, with the ultimate goal of matching Micron and other semiconductor-related industries with businesses looking to pivot or grow into semiconductor supply chain and construction sectors.

Once in operation, Micron's megafab complex will also spark operating contracts for a wide range of suppliers and service providers. Micron has also pledged to use good faith efforts to achieve 20% of eligible operating spend with SEDI-owned businesses. To ensure that

these goals are met, Micron will require applicable Tier 1 and Tier 2 suppliers to establish spend goals on their contracts as well.

ESD has hired full time-staff dedicated to helping Micron realize these diverse contracting commitments as a part of the Governor's Office of Semiconductor Expansion, Management, and Integration (GO-SEMI). GO-SEMI staff are engaging small and diverse businesses in Central New York and across the state and building a robust database of SEDI-owned firms that could be eligible for contracts to ensure these businesses get the information and assistance they need to access these opportunities.

Micron and its preconstruction phase general contractor are working closely with ESD to realize these goals as its project moves to break ground this year. Micron and its general contractor hosted an opportunities and awareness session for local and diverse subcontractors, vendors, suppliers, and professional service providers in Syracuse. This promises to be the first of many engagements to empower local and diverse businesses to benefit from the Micron project.

### **Diverse Hiring Goals & Workforce Development Initiatives**

Micron's investment will create tens of thousands of good paying jobs, the majority of which will not require a four-year college degree.

Governor Hochul is committed to ensuring that New Yorkers, especially New Yorkers from communities historically left out of economic growth, are empowered with the skills they need to seize these opportunities.

In the Community Investment Framework signed by Governor Hochul and Micron, the company has pledged to work with state and local partners and construction contractors and subcontractors to establish a target percentage of the construction workforce to be from disadvantaged populations. Additionally, Micron has committed to establish a target percentage of permanent hires for facility operations to be made from targeted census tracts and historically disadvantaged populations.

Under the Governor's leadership, ESD is making ambitious investments in new workforce development programs and partnering with Micron on new and innovative education and training programs in Central New York to empower workers with the skills they need to take on these new jobs and meet those targets.

Governor Hochul, Micron, the American Federation of Teachers, New York State United Teachers and the United Federation of Teachers partnered to create and launch the Advanced Technology Framework, a curriculum and learning toolkit to help high school students hone the foundational skills necessary for career success in the booming semiconductor industry. The Framework is currently being piloted with the Board of Cooperative Educational Services (BOCES) in 10 school districts through 2027.

Micron is also realizing commitments to local community colleges. In 2023, Governor Hochul unveiled plans for a new state-of-the-art cleanroom simulation lab at Onondaga Community College (OCC). The lab was made possible by a \$5 million grant from Micron,

the largest ever single donation in OCC history. Students at OCC and other SUNY community colleges can also take advantage of Micron's new internship program that provide hands-on, experiential learning for New York students in either its Boise, Idaho or Manassas, Virginia fabs, in preparation for joining the Clay, NY fab once the facility is operational.

Beyond the Community Investment Framework, ESD has been making major investments to prepare Central New Yorkers for future jobs. Governor Hochul's signature \$200 million ON-RAMP program will build four new workforce development centers in strategic, high impact locations across upstate. The South Side of Syracuse will be home to the state's flagship ON-RAMP Center and will provide robust wraparound services to connect diverse and skilled New Yorkers with careers in dynamic, high-growth advanced manufacturing industries like semiconductors.

These investments and initiatives will help empower Central New Yorkers from diverse and historically disadvantaged communities access the tens of thousands of jobs that will be created by Micron's project.

### **Housing**

Micron's investment will reverse decades of population decline in Central New York, likely bringing the population of Syracuse back to its 1970s levels at a growth rate not seen since the 1950s.

To ensure that the region can sustain this growth while preserving its most vulnerable communities, ESD commissioned a comprehensive regional housing study. The housing study found that the region will need to dramatically increase housing production in the near term to handle this growth and made policy recommendations to accomplish that.

In July 2024, ESD brought local, state, and national leaders and housing experts together for a summit at LeMoyne College. Over the course of the day long intensive, attendees were presented the study findings and discussed potential solutions including financing, zoning updates, and areas where state support can assist effectively.

Since then, ESD has supported a number of mixed-use housing initiatives in Central New York including:

- A \$1.25 million grant to support the \$40,733,830 redevelopment of the Chimes Building at 500 South Salina Street in Syracuse into a mixed-use, mixed-income building with 152 new residential units.
- A \$1.25 million grant to support the \$25,145,547 development of Bridgeview Commons in Cortland. The development will create 60 new, affordable, residential units targeting families with 30 units designated for victims of domestic violence, two non-profits (Seven Valleys Food Rescue and Cortland ReUse), as well as retail space in a rehabilitated strip mall.

- A \$1 million grant to support the \$18,739,361 conversion of a vacant office building in downtown Syracuse into a mixed-use development that will create 39 new mixed-income residential units.

Governor Hochul has made housing and affordability a top priority and has enacted several sweeping programs aimed at increasing the production of housing including unlocking \$650 million in state funding for Pro-Housing communities and \$100 million in capital funding to assist with infrastructure to build new housing.

In July 2025, New York State Housing and Community Development announced a \$100 million Housing Acceleration Fund, the state's first revolving loan fund designed to unlock new housing – half of which will be dedicated for upstate projects.

Additionally, housing was identified as an immediate priority by the Community Engagement Committee and will be a central focus of the \$500 million CIF in Central New York.

Taken together, the scale and scope of these commitments rank among the most ambitious community investments ever to accompany an economic development project. They demonstrate Governor Hochul's commitment to realizing the incredible potential of Micron's investment while centering the needs and voices of Central New Yorkers and their communities.

Sincerely,



Kevin Younis

*Chief Operating Officer and Executive Deputy Commissioner, Empire State Development*

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**From:** Mary Zadrozny <zadrozny@twcny.rr.com>  
**Sent:** Monday, August 11, 2025 1:36 PM  
**To:** chipsnepa  
**Subject:** [EXTERNAL] Micron Environmental Impact Comments

I believe there are legitimate concerns with Micron but without the proper amount of time given to our community to analyze this environmental impact study, we are at a complete disadvantage. We were given just one day of public hearings for something that will impact every one of our lives and future generations. Without the opportunity to vote on any of this, given the huge and forever impacts - this is completely unfair to those who have lived in this area for decades.

I believe if people truly cared about the environment and this community, a task force would be set up of experts and community members to help us understand what is at stake. Those of us who are not scientists, environmental professionals, engineers, etc., can not accurately comprehend an environmental impact study of this size, especially in such a short time frame. (I guess maybe if people don't have to work, or take care of their families.) And I believe it is intentionally being handled this way to give every advantage to Micron project supporters.

My husband and I have previously lived in area where there was explosive population growth so we know first hand what it is like; Orlando, Florida when Disney was first developing in 1970-90's. The crime, the traffic and building boom changed the area completely and not for the better. Visiting Disney, tourists think it's all magical, but those of us actually living and working in the area full time - not so much.

We made the decision to move to CNY over 28 years ago to be near family and we were attracted to the rural feel of this area. Our plan was to live out the rest of our lives here, but now we talk about where we will move if Micron project actually moves forward. We have no desire to live in a congested community that doesn't even have enough medical and police staffing needed for the current population, nor can we bear to witness this great landscape as it is forever destroyed.

I don't have any new comments or environmental concerns that haven't already been brought up, but I am deeply concerned about this Micron plant for many of the same reasons others have tried to address: The forever highly toxic chemicals damaging our water, ground and air. What chemicals exactly?

The obscene amount of fresh water and power Micron will need.

The negative effect on wildlife, wetlands.

The increased traffic and population.

Lack of affordable housing.

Effect on the water table.

Who is really going to be footing the bill for everything needed?

We can't even get our street re-paved after they did most of the streets in the subdivision in recent years, plus they stopped doing touch up repairs on the cracks 3 years ago. If we can't even maintain the streets we already have, what happens when all the attention/resources goes to the new roads Micron and related businesses need?

What happens if this chip plant is no longer needed when new technology comes along, making chips obsolete?

As usual these projects affecting every single person in this community are developed without giving the residents a chance to vote but yet we all have to deal with the consequences of what a few people in government decide to do. They sure do love their photo ops with the shovels and ribbon cuttings. Someone is going to make a lot of money, but it's not going to be the taxpayers.

And as usual, when they pitch these projects like Destiny Mall, the Aquarium, Amazon Warehouse, etc., they don't want to address the negative effects or properly plan. They are not interested in being good stewards of this fragile environment. It's all about \$\$\$. They show us beautiful artist renderings of magical things like Destiny Mall but by the time they break ground, it's shrinks down to half the size of what they planned and costs way more than we were originally told.

What a disappointment Destiny has turned out to be; the owners defaulting on their mortgage, so many stores and restaurants that have left, so many tenants that have had problems with the owners, plus most of us residents stopped going there a while ago because of the crime. The Aquarium project, already struggling to complete construction because of rising costs. Not to mention the huge drop in international tourism this year and unstable economy that needs to be considered when projecting realistic attendance numbers.

**These mega projects are particularly concerning because of the mega consequences. Instead of pushing these massive "super-sized" projects I'd rather see smaller scale projects that are well done with sustainability, innovation, the environment and the entire community's best interests in mind. And not just for the current moment in history, but for the future generations.**

Unfortunately I really don't think my comments will make any difference but here they are.

Thank you for your time,  
Mary Seliger  
Baldwinsville

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**From:** Dustin Hill <dthill17@hotmail.com>  
**Sent:** Tuesday, August 12, 2025 4:00 PM  
**To:** chipsnepa@chips.gov  
**Subject:** [EXTERNAL] Public comment DEIS Micron project

To: chipsnepa@chips.gov

Subject: DEIS for Micron Project (Clay, NY)

To whom it may concern,

I am writing to provide a public comment on the draft environmental impact statement related to the Micron project proposed for Clay, NY. I have the following comments on the DEIS document:

1. Removal of wetlands. The project proposes to remove over 300 natural wetlands and replace them with artificial wetlands elsewhere. Wetlands provide essential ecosystem services, including cleaning water. The nearby Oneida River and Oneida Lake face increasing pressure from pollution and removing these wetlands in the area will increase the potential for these waterways to become more contaminated and unfit for their current use. The Micron project should not remove any wetlands in the area and should construct is project in a manner that would eliminate any impact on wetlands. Any wetlands that are removed should not be replaced dozens of miles away but instead be replaced as close as possible to the original wetlands.
2. Animal habitats. Several animal habitats for endangered and threatened species are at risk. The DEIS does not propose very much to ensure that equal or better habitat will be provided for these animals. Endangering them further would be a great act of negligence.
3. Parking lots. The project proposes massive parking areas that are seas of asphalt and concrete creating new impervious surfaces. These parking areas do not maximize the space appropriately and should be reduced in size or consolidated into some kind of parking garage. The parking lots will only increase runoff of water and increase flooding in the area. A smaller footprint for the parking lots would reduce these impacts as well as using certain pervious materials or construction to ensure proper drainage.
4. Solar and wind energy. The DEIS does not include much information on renewable energy. The roof of the fabrication facilities could include solar panels and micro-wind turbines to efficiently generate energy onsite and reduce the reliance on external energy sources.

5. The project would result in millions of pounds of waste being produced each year, much of which would be released into the air or water. The project should seek to use biodegradable chemicals and not use “forever chemicals” like PFAs that cannot be reliably removed from wastewater treatment plants. Micron should not take any proprietary exemptions from releasing the names and types of chemicals used on site. The safety of nearby residents and the environment is at risk if first responders do not know what chemicals are being stored on site. Further, the project will be receiving billions of dollars from taxpayer subsidies. Thus, the project should not do anything to risk or harm the nearby community. The least the project developers and owners of Micron could do is ensure that everyone knows what chemicals are being released on site or being stored to ensure the safety of the community. Harmful pollution releases will occur, so planning for that response and reducing the pollution to the maximum level possible should be required. Achieving minimum source reduction of pollution is unacceptable for a project that is receiving public tax dollars.

To summarize, the project in its current form will destroy wetlands, pollute our local waterways, increase risk of flooding, and harm the community’s overall health. The DEIS does not adequately address these concerns given that the project is receiving so much tax-payer support. For these reasons, I think the DEIS needs to be revised for this project. I hope you take my comments into consideration.

Respectfully,

Dustin T. Hill

**Archived:** Wednesday, August 13, 2025 12:03:24 PM

**From:** [Cindy Rider](#)

**Mail received time:** Tue, 12 Aug 2025 02:29:57

**Sent:** Tue, 12 Aug 2025 02:29:45

**To:** [chipsnepa](#)

**Subject:** [EXTERNAL] Micron swamps

**Importance:** Normal

**Sensitivity:** None

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I am concerned about the lack of information that was provided about swamp land that is being created in Oswego County. There were no meetings in Oswego County and no information was distributed by the county or town of Hastings. I feel these swamp lands should have been created in the county that Micron is in. Cicero swamp is nearby to Micron and I'm sure that could have been increased in size.

I live right next to Buxton Creek and I would like to know who will be monitoring the mosquitoes that will be multiplying in these swamps? With Triple E already present in the mosquitoes in Central Square this is going to be a problem. Also the herbicides that will be used in the creation of the Caughdenoy and Buxton Creeks swamps will be draining into the Oneida River.

Cindy Rider  
Manhattan Park Dr  
Pennellville

[Yahoo Mail: Search, Organize, Conquer](#)



**Department of  
Transportation**

**KATHY HOCHUL**  
Governor

**MARIE THERESE DOMINGUEZ**  
Commissioner

**STEPHANIE WINKELHAKE P.E.**  
Chief Engineer

August 13, 2025

Robert M. Petrovich, Deputy County Executive  
Onondaga County Industrial Development Agency (OCIDA)  
ATTN: Micron Project  
335 Montgomery Street, Floor 2M  
Syracuse, New York 13202

RE: Micron Semiconductor Manufacturing Project, Clay, New York  
NYSDOT Comments on Draft Environmental Impact Statement

Dear Mr. Petrovich:

Thank you for the opportunity to comment on the Micron Semiconductor Manufacturing Project Draft Environmental Impact Statement (DEIS).

The New York State Department of Transportation (NYSDOT) acknowledges the assessment in the DEIS of potential transportation improvements on state-owned roadways and the recommendations to mitigate the traffic impacts resulting from the Micron Project as summarized in Section 3.1. As part of a separate environmental review, the NYSDOT, in coordination with FHWA, will further study the improvements that are needed to the state transportation network. To preserve transparency in this process, the NYSDOT would like to note that the improvements studied in this separate review may differ from what is presented in the Micron DEIS.

The NYSDOT appreciates the coordination to date and will continue to work with the Onondaga County Industrial Development Agency as the Micron Project progresses. If you have any questions or would like to further discuss these comments, please contact me at 518-457-8327 or [Stephanie.Winkelhake@dot.ny.gov](mailto:Stephanie.Winkelhake@dot.ny.gov) [OR please contact Catherine Leslie at 518-485-9449 or [Catherine.Leslie@dot.ny.gov](mailto:Catherine.Leslie@dot.ny.gov)].

Sincerely,

A handwritten signature in black ink, appearing to read "Stephanie Winkelhake".

Stephanie Winkelhake, P.E.  
Chief Engineer

cc: R. Davies, FHWA  
M. Chatfield, ESD  
T. Lennon, NYSDOT  
A. McNally, NYSDOT  
R. Wilder, NYSDOT  
C. Leslie, NYSDOT  
A. Stiles, NYSDOT R3  
T. Talbot, NYSDOT R3

1 7/24/2025 - Micron Semiconductor Manufacturing Project

2 STATE OF NEW YORK

3 ONONDAGA COUNTY INDUSTRIAL DEVELOPMENT AGENCY

4 U.S. DEPARTMENT OF COMMERCE CHIPS PROGRAM OFFICE

5 U.S. ARMY CORPS OF ENGINEERS

6  
7 Public Hearing on NEPA-SEQRA Draft Environmental  
8 Impact Statement and Clean Water Act Section 404

9 Permit Application

10 Micron Semiconductor Manufacturing Project,  
11 Clay, New York

12 SESSION ONE

13 VIDEO RECORDED PUBLIC HEARING

14 DATE: July 24, 2025 at 10:02 a.m.

15 LOCATION: Liverpool High School

16 4338 Wetzel Road

17 Liverpool, New York 13090

18  
19  
20 Reported by Cari Roraback

21  
22  
23  
24  
25

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 APPEARANCES:  
3 JEFF DAVIS ESQ., BARCLAY DAMAN counsel FOR OCIDA  
4 ROBERT PETROVICH, EXECUTIVE DIRECTOR OF OCIDA  
5 DAVID FRENKEL, DIRECTOR OF THE CHIPS PROGRAM  
6 LT. COL. ROB BURNHAM, COMMANDER OF THE  
7 BUFFALO DISTRICT, U.S. ARMY CORPS. OF ENGINEER  
8 MARTY WARGO, CHIEF OF BUFFALO DISTRICT REGULATORY  
9 BRANCH  
10 CARLOS AGUIRRE, SPANISH INTERPRETER  
11 MAGGIE RUSSELL, ASL INTERPRETER  
12 ZENNA PRELI, ASL INTERPRETER  
13 PUBLIC SPEAKERS:  
14 TONYA EZA  
15 BETH LAUZON  
16 SARAH FERGERSON  
17 DR. HILARY MCMANUS  
18 BILL PELKEY  
19 JIM D'AGOSTINO  
20 PAT SCHAEFER  
21 DAVE CAPRIO  
22 PAUL OSSENBRUGGEN  
23 SUE GATELY  
24 DAN LARSON  
25 KAREN HAAS  
GWENDOLYN MUOK  
BEN SIO  
SUSAN CROSSETT  
GREG LANCETTE  
JEFF NORENSKY  
GEORGE LOREFICE  
JAMIE SHINN  
DR. MICHAEL MIKULEWICZ  
DESIREE MATTHEWS

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 BRIAN BOUCHARD  
3 KEANNA SERVISS  
4 DON HUGHES  
5 JOHN DOE  
6 JOHN PRZEPIORA  
7 PAUL DOODY  
8 RICH JENNEJAHN  
9 SAM DAMICO  
10 JOE BULLA  
11 ELIZABETH BRIDGES  
12 GREG LANCETTE  
13 BETH LAUZON  
14 JUSTIN KOSKOWSKI  
15 STEPH ADAMS  
16 MARY THOMPSON  
17 BILL SPRETER  
18 RICHARD WOOD  
19 PETER CAPLAN

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 (The public hearing commenced at 10:02  
3 a.m.)

4 MR. PETROVICH: Good morning. This is  
5 the morning session public hearing on the NEPA-SEQRA,  
6 Draft Environmental Impact Statement and Clean Water  
7 Act Section 404 Permit relative to the Micron  
8 Semiconductor Manufacturing Project in Clay, New  
9 York.

10 Good morning. Thank you for coming.  
11 Before we get started with this session, I wanted to  
12 take care of some preliminary safety matters.

13 Please note the exits are plainly  
14 marked at the back of the auditorium, and restrooms  
15 are located just outside, in the lobby in case those  
16 are needed. Please note that in case of emergency,  
17 we have law enforcement and security personnel  
18 present on site.

19 We also have American Sign Language  
20 and Spanish Language interpreters, so if you need  
21 those services they're down in front here, and they  
22 will be happy and glad to accommodate you in those  
23 needs. I'm Robert Petrovich. I am the executive  
24 director of the Onondaga County Industrial  
25 Development Agency or OCIDA.

1 7/24/2025 - Micron Semiconductor Manufacturing Project

2 I'm here along with OCIDA's legal  
3 counsel, Jeff Davis from Barclay Damon, who will be  
4 moderating this public hearing. This is a  
5 prescriptive process, so I have prepared remarks that  
6 I'm going to read to make sure that we dot all the  
7 I's and cross all the t's.

8 Seated with me at this head table is  
9 Mr. David Frenkel, who is the director of the  
10 Environmental Division of the CHIPS Program Office or  
11 C.P.O., which is part of the Department of Commerce.  
12 Mr. Frenkel will also be making brief opening remarks  
13 shortly.

14 I would also like to introduce  
15 Lieutenant Colonel Robert Burnham, Commander of the  
16 Buffalo District of the U.S. Army Corps of Engineers.  
17 Mr. Colonel Burnham will be making opening remarks as  
18 well.

19 And -- and also seated at the table is  
20 Marty Wargo, Chief of the Buffalo District Regulatory  
21 Branch. The purpose of today's hearing is to give  
22 members of the public an opportunity to provide  
23 verbal comments on the environmental review of  
24 Micron's proposed semiconductor manufacturing project  
25 and connected actions, which OCIDA and C.P.O. are

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 jointly conducting under the New York State  
3 Environmental Quality Review Act or SEQRA, and the  
4 National Environmental Policy Act or NEPA.

5 As well as to provide comments on the  
6 review of Micron's proposed impacts to waters of the  
7 United State under Section 404 of the Clean Water  
8 Act, which is being conducted by the Army Corps of  
9 Engineers.

10 OCIDA and C.P.O. released the draft  
11 Environmental Impact Statement, or E.I.S., for the  
12 Micron project on June 25, 2025. The Army Corps of  
13 Engineers issued the public notice of Micron's permit  
14 application under Section 404 of the Clean Water Act  
15 on June 27, 2025.

16 Information on how to provide written  
17 comments on either the draft E.I.S. or the Section  
18 404 review is displayed on alternating slides in the  
19 front of the room.

20 With respect to the SEQRA process  
21 today, most of you in attendance are familiar with  
22 the proposed project, however, I would like to  
23 provide a brief review of what has occurred thus far  
24 in the environmental review process.

25 On July 14, 2023, OCIDA received an

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 application for financial assistance from Micron semi  
3 -- New York Semiconductor Manufacturing, LLC. As  
4 most of you are aware, Micron intends to invest  
5 approximately one hundred billion dollars over the  
6 next twenty years to build a leading edge  
7 semiconductor manufacturing campus in the town of  
8 Clay at the expanded White Pine Commerce Park located  
9 at 5171 Route 31, the town of Clay, New York.

10 The proposed project must be reviewed  
11 under SEQRA in accordance with requirements of SEQRA  
12 on September 14, 2023, OCIDA declared itself as the  
13 lead agency of the SEQRA process.

14 OCIDA issued a positive declaration  
15 due to the project's potential to result in one or  
16 more significant adverse impacts and declared its  
17 intent to prepare a draft environmental impact  
18 statement.

19 OCIDA then undertook the next step,  
20 which was scoping. Scoping is a process that  
21 develops a written document, scope, which outlines  
22 the topics and analysis of potential environmental  
23 impacts to be studied and addressed in the draft  
24 E.I.S.

25 Following public comment, OCIDA

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 adopted the final SEQRA scope on December 14, 2023.  
3 The public was also previously given an opportunity  
4 to comment on the scope for this project in March  
5 2024.

6 Following adoption of the final SEQRA  
7 scope, OCIDA engage with C.P.O. and others to begin  
8 the process of drafting the E.I.S., which evaluates  
9 the potential environmental effects of the proposed  
10 project.

11 During development of the draft  
12 E.I.S., OCIDA regularly consulted with other SEQRA  
13 involved and interested agencies including the New  
14 York State Department of Environmental Conservation,  
15 and the New York State Department of Transportation  
16 to ensure that all environmental impacts were  
17 identified and fully evaluated in the draft E.I.S.

18 On June 25, 2025, OCIDA determined  
19 that the draft E.I.S. was complete for commencement  
20 of the public review pursuant to SEQRA and opened the  
21 public comment period.

22 The purpose of this morning session,  
23 and we will be having two other sessions throughout  
24 the day, is for the public hearing to receive  
25 comments on the draft E.I.S., as well as, for the

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 Section 404, which Colonel Burnham will outline  
3 shortly.

4 Please note, this is not a question  
5 and answer session. We will not respond or reply to  
6 comments expressed by the public during this hearing.  
7 We will likewise not respond to any questions posed  
8 by the public during this hearing.

9 OCIDA and C.P.O. will respond to all  
10 comments as part of the final E.I.S. This is an  
11 opportunity for the public to place their comments on  
12 the draft E.I.S. under Section 404 review on the  
13 record. OCIDA encourages the public to participate  
14 in this process.

15 This is your opportunity to have your  
16 voice heard. However, this hearing is not your only  
17 opportunity to submit comments on the draft E.I.S. or  
18 the 404 review. If you do not wish to make a comment  
19 here at this hearing, you may also submit your  
20 comments on the draft E.I.S. or the 404 review, which  
21 Colonel Burnham will address shortly using the  
22 information displayed on the alternate -- alternating  
23 slides in this room.

24 We have extra copies of notices on how  
25 to comment available for you if you wish to make a

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 copy. The OCIDA notice and contact information for  
3 submitting comments can also be found on OCIDA's  
4 website.

5 Public comments will be accepted  
6 through August 11, 2025, your input, both verbal  
7 comments received here today and tonight, and all  
8 written comments that are received by OCIDA and  
9 C.P.O. will help OCIDA and C.P.O. prepare a final  
10 E.I.S., which will be released after all comments  
11 have been received and considered.

12 Equal weight is given to both verbal  
13 and written comments, it's an important point. There  
14 is a court reporter here this -- today, throughout  
15 the day who will be making a record of all comments  
16 made. We ask those in attendance to please show  
17 respect for the person that is speaking, even if you  
18 do not agree with the comment.

19 And also, please hold applause or  
20 other noise so that we may take an accurate record of  
21 this proceeding. At this point, I would like to turn  
22 it over to my colleague, David Frenkel from C.P.O.  
23 for his remarks.

24 MR. FRENKEL: Good morning, ladies and  
25 gentlemen. As Bob mentioned, my name is David

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 Frenkel. I am the director of the environmental  
3 division for the CHIPS Program Office or C.P.O.,  
4 which is part of the U.S. Department of Commerce.

5 C.P.O. is the lead federal agency for  
6 the environment review of this project under the  
7 National Environmental Policy Act, or NEPA based on  
8 C.P.O.s -- P.C.P.O.s role in providing direct funding  
9 to Micron for its proposed semiconductor  
10 manufacturing facility.

11 When a project requires both a federal  
12 and state environmental review, it is not uncommon  
13 for lead agencies at the federal and state level to  
14 work together to prepare a single comprehensive  
15 document. C.P.O. has been working with OCIDA to  
16 prepare the draft E.I.S. on that basis.

17 The E.I.S. is a joint document under  
18 NEPA and SEQRA. My role today is to accept public  
19 comments as part of the NEPA process on behalf of  
20 C.P.O. and the U.S. Department of Commerce. C.P.O.  
21 also encourages public participation in the process  
22 and welcomes all comments on the draft E.I.S.

23 We will give equal weight to verbal  
24 comments at today's hearing and written comments  
25 submitted to C.P.O. or OCIDA by August 11th. As Bob

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 noted, after the close of public comment period,  
3 C.P.O. and OCIDA will respond to all comments  
4 received when we prepare the final E.I.S. document.

5 While C.P.O. and OCIDA jointly  
6 prepared this E.I.S., because it is a comprehensive  
7 document that identifies the potential environmental  
8 effects on the Micron project, will also serve as a  
9 resource for other agencies conducting their own  
10 review of the Micron Project and other actions  
11 connected to the project.

12 On that note, I would now like to turn  
13 it over to Lieutenant Colonel Burnham for open  
14 remarks from the U.S. Army Corps of Engineers. Thank  
15 you for your attendance today at this public hearing,  
16 and we appreciate your participation in the process.

17 MR. BURNHAM: Thank you. Good  
18 morning, ladies and gentlemen. As previously said,  
19 I'm Lieutenant Colonel Rob Burnham, Commander of the  
20 Buffalo District, U.S. Army Corps of Engineers.

21 I will be the presiding officer for  
22 the -- the Clean Water Act Section 404 aspect of this  
23 public hearing on behalf of the Army Corps of  
24 Engineers. Seated at the desk with me today, to my  
25 right and your left, is Mr. Marty Wargo, chief of the

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 Buffalo District Regulatory Branch.

3 While the Department of Commerce is  
4 the lead federal agency on the E.I.S. for this  
5 project, the Corps of Engineers is a cooperating  
6 agency on the E.I.S. And we are here to specifically  
7 obtain information and evidence and receive public  
8 comment to assist in the regulatory review of the  
9 permanent application by Micron, New York  
10 semiconductor -- semiconductor.

11 As well as, for two connected actions  
12 proposed by National Grid for a gas main and electric  
13 substation expansion. Because of the Micron and  
14 National Grid project proposed a placement of fill  
15 into federally regulated wetlands and streams,  
16 collectively referred to as the waters of the United  
17 States.

18 Permits are required for the corps of  
19 engineers pursuant to Section 404 of the Clean Water  
20 Act. Department of the Army authorization is  
21 therefore required the following.

22 For the Micron Semiconductor  
23 Manufacturing Campus, the permanent loss of  
24 approximately hundred and ninety-four acres of  
25 federally regulated wetlands, and temporary impacts

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 to an additional two point nine five acres, as well  
3 as, the permanent loss of six thousand two hundred  
4 and eighty-three feet of federally regulated streams  
5 and ditches, and temporary impacts to an additional a  
6 hundred and thirty feet.

7 For the National Grid Substation work,  
8 the permanent -- the permanent impact to  
9 approximately four acres of wetlands, and one  
10 thousand five hundred and forty-five feet of  
11 regulated ditches, as well as, temporary impacts to  
12 an additional eleven acres of wetland, and six eighty  
13 three feet of stream.

14 And for the National Grid, gas main  
15 work, the permanent impact to approximately point  
16 zero eight seven acres of wetland, conversion of  
17 point zero three three -- point zero three three  
18 acres of forested wetlands, and temporary impacts to  
19 approximately seven point four acres of wetlands, and  
20 a hundred and seventy-five linear feet of stream.

21 The purpose for the proposed work is  
22 to -- is to construct and operate commercially viable  
23 and globally competitive advanced D.R. -- DRAM  
24 fabrication facility on a single unified site in New  
25 York State.

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2 The Corps of Engineers is neither a  
3 proponent for, nor an opponent of the proposed  
4 projects. Our role is to determine whether these  
5 proposed fill activities are contrary to the public  
6 interest or not.

7 This hearing will play an important  
8 part in that determination. The hearing will be  
9 conducted according to the procedure set forth in  
10 Title 33 of the code of Federal Regulations Part 327.  
11 The public comment period for the Corps of Engineers  
12 public notice also closes on August 11th, 2025.

13 Hard copies of the public notice are  
14 available in the registration area. Please note that  
15 there -- there was a typo -- there is a typo in some  
16 copies of the public notice indicating the comment  
17 period closes on August 18th, the correct date is  
18 August 11th.

19 Details on how to comment on the  
20 proposed wetland and stream impacts may be found in  
21 the public notice, as well as, displayed on the  
22 screen in the front of the room, right behind me.

23 The comments made here, plus all  
24 submitted written information will become part of the  
25 Corps of Engineers Section 404 administrative record,

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 and will be used to evaluate the probable impacts,  
3 including the cumulative impacts of the proposed  
4 activity on the -- on the public interest.

5 The ultimate decision on the submitted  
6 applications will reflect the national concern for  
7 both the protection and utilization of important  
8 resources. The Corps of Engineers permit decisions  
9 will come after completion of the E.I.S., because we  
10 are also relying upon that for the purposes of NEPA  
11 compliance.

12 Based on the time limitations, if  
13 anyone desires an opportunity for rebuttal to any of  
14 the information presented at the hearing, we ask that  
15 you please do so in writing and provide that to  
16 someone at the registration table today, and it will  
17 become part of the administrative record.

18 General comments may also be submitted  
19 until close of the public comment period. Thank you  
20 and I look forward to -- to hearing your comments  
21 this morning.

22 MR. PETROVICH: Thank you, Lieutenant  
23 Colonel Burnham. I would like to now introduce  
24 OCIDA's counsel, Jeff Davis, who will go over the  
25 process of how we will conduct the hearing. Mr.

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 Davis.

3 MR. DAVIS: Good morning. Thank you  
4 for coming. If you do wish to make a comment, will  
5 ask that you please state your full name and address  
6 and speak clearly and slowly so that the reporter can  
7 make an accurate record.

8 Comments will be limited to three  
9 minutes to afford everyone who wishes to comment an  
10 opportunity to do so. There will be no ceding of  
11 time to others. If there is time at the end of the  
12 session, speakers may return to the microphone and  
13 will be afforded one additional three-minute  
14 opportunity to speak.

15 We'll call those who have signed up to  
16 submit comments up to the microphone. We have two  
17 microphones at the end of each aisle here to allow as  
18 many people to be heard as possible. I'm going to  
19 announce the names of the speakers and then also the  
20 person that's on deck, if you will, that will be  
21 speaking next so that you can quietly proceed down to  
22 a microphone on either side and be prepared to speak.

23 We ask that you do that so quietly so  
24 you do not interrupt the current speaker. Again, if  
25 you've not signed up to speak, but you wish to do so,

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2 please complete a comment card in the lobby. I have  
3 those cards here, which are going to allow us to work  
4 through this session.

5 So with that, we're going to kick off  
6 the session and our first speaker is Tonya Eza, and  
7 next would be Beth Lauzon.

8 MS. EZA: Hi, I am Tonya Eza. I -- I  
9 reside at 113 Eagles Point Circle in Liverpool, and I  
10 work for Emmanuel Lutheran Church in Clay. So  
11 Emmanuel Lutheran Church is located about a mile or  
12 two down the road from where Micron's first fabs will  
13 be built.

14 The first impact that we will feel is  
15 the effects from the physical construction that will  
16 be happening. Micron has estimated that up to five  
17 hundred and fifty trucks will be needed every day to  
18 begin their construction.

19 Many of those trucks will be rumbling  
20 by our church building, clogging up traffic and  
21 creating noise as we seek to create a haven of peace  
22 where we can worship God in our church building.

23 The increased traffic will also create  
24 difficulties for our programs, many of which reach  
25 out to feed our local community, including seniors.

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2 The people to whom we minister will  
3 not want to fight the traffic to get here and will  
4 not be able to access the food and community that  
5 they need. The next impact lies in Micron's need to  
6 widen Route 31 in response to the increased traffic.

7 Our front steps to the church building  
8 are only twenty-five feet away from Route 31. Not  
9 only will widening the road force us to lose at least  
10 part of our historic building, which is over one  
11 hundred years old, but it will also hurt our ability  
12 to worship, and it will also hurt our ability to  
13 minister to the community around us.

14 Furthermore, not knowing when this  
15 roadwork will happen is right now hampering our  
16 ability to plan for major maintenance projects on the  
17 building, which need to be done for the safety of all  
18 who come here.

19 Finally, we are also concerned about  
20 the environmental impacts these fabs will have on us  
21 and on the community around us. With the sewer going  
22 in, we need to know if this will raise or lower our  
23 water table.

24 We already suffer from periodic floods  
25 due to torrential rains. If the water table is

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 raised this will only become worse. We are also  
3 concerned about the potential for harmful PFAS  
4 chemicals and rainwater runoff and what that will do  
5 to our water supply.

6 We need to understand this better so  
7 that we know the risks and what we can do to mitigate  
8 them. Emmanuel is an asset to the community, and  
9 we've been in Clay for over two hundred years. We  
10 host A.A. meetings, we host grief support meetings.

11 We run a food pantry. We run a  
12 monthly senior luncheon where seniors can come and  
13 get a free meal. We offer spiritual support to those  
14 in need. We hold community events for children like  
15 trunk or treat at Halloween and an Easter egg hunt in  
16 the spring.

17 We are afraid that Micron's plans will  
18 remove us from the community when we could be a real  
19 asset to all of the people who are coming to work in  
20 these fabs.

21 We're not here to complain, but we're  
22 here to vocalize our fears and the potential impacts  
23 and to ask Micron, the state of New York, Onondaga  
24 County, and the Town of Clay to work with us so that  
25 we can find a way to remain in the community and

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 continue to be an asset. Thank you.

3 [Applause]

4 MR. DAVIS: Thank you. Next, Beth  
5 Lauzon, and then after Beth would be Sarah Ferguson.

6 MS. LAUZON: Good morning. I'm Beth  
7 Lauzon. I reside both in Camillus and in the town of  
8 Canastota out in Madison County. Two areas that may  
9 possibly be affected by Micron, specifically in  
10 regards to industrial and water waste.

11 My questions basically come from  
12 living here my entire life and seeing what happened  
13 to the previous big employer, Allied Solvay Chemical,  
14 and what they did to Onondaga Lake and the Town of  
15 Camillus and their industrial waste sites.

16 I live -- actually, I live -- I grew  
17 up in a house that actually was on and owed  
18 industrial waste that from Allied Chemical and I saw  
19 the cancers coming from that. But that's that,  
20 Allied's gone, Honeywell is doing what they do.

21 And I want to make sure we don't do  
22 that with Micron. This is going on for forty to a  
23 hundred years. Do not come in destroy the  
24 environment, and take off. So my questions,  
25 specifically regarding industrial waste that will be

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2 generated by Micron for decades -- decades is for the  
3 draft.

4 I understand it's a draft, nothing was  
5 really specific in there. So I expect to see the  
6 specific report, a detailed list of the chemicals  
7 that are going to be dispersed in Lake Ontario per  
8 the draft report.

9 How does the disbursement take place,  
10 who does the monitoring and how often? Are you just  
11 going to dump it and say goodbye to you, or is  
12 somebody actually going to see what's going to happen  
13 when it's dumped? Second, the mixing zone in the  
14 Onondaga River.

15 More detailed information is required  
16 in how that works, how large it is, where it is  
17 located, and a list of chemicals dispersed. Why the  
18 chemicals are allowed to be higher than New York  
19 State allows, that should all be detailed out in the  
20 final report.

21 And third and final, a detailed list  
22 of industrial waste that is going into local  
23 landfills because I know it will, because that's what  
24 they're going to do, they done before, they'll do it  
25 again. And specifically, because like I said, I do

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 have a house in Canastota, the Madison County  
3 Landfill.

4 Those are my questions, concerns, they  
5 have to be addressed, we'd like to see addressed in  
6 the final report. And let's do this, let's do it  
7 right from the get go. Our grandchildren, our  
8 children, our great grandchildren, and our great,  
9 great grandchildren are going to be dealing with this  
10 mess.

11 If we mess it up now, we're never  
12 going to be able to live this down ever. Thank you.

13 [Applause]

14 MR. DAVIS: Thank you. Sarah  
15 Ferguson, and then after that is Hillary McManus.

16 MS. FERGURSON: Sarah Ferguson, 308  
17 Catherine Street in North Syracuse. I am a thirty-  
18 year resident of the Clay area. I am also a  
19 seventeen-year member of the Operating Engineers  
20 Local 158. Our local represents four thousand union  
21 members in the Upstate New York area.

22 My position with the local is  
23 overseeing all the apprentices as the training fund  
24 coordinator. The opportunities provided by the  
25 Micron Project will help our local community not only

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2 with the construction jobs for our members, but  
3 careers for our apprentices.

4 It will also create jobs for our  
5 neighbors in this community, I support this project.

6 MR. DAVIS: Thank you. Next, Hillary  
7 McManus, and after Hillary is Bill Pelkey.

8 MS. MCMANUS: Good morning, I'm Dr.  
9 Hilary McManus, professor of Biological and  
10 Environmental Sciences, and I live in Fayetteville,  
11 New York. Thank you for hearing us today. I'd like  
12 to address that close to three hundred acres of  
13 identified wetlands will be destroyed and filled with  
14 the Micron construction.

15 Wetlands are powerful natural allies  
16 in the fight against climate change. Just three  
17 hundred acres of freshwater wetlands can store over  
18 three hundred thousand metric tons of carbon dioxide.  
19 That's the same as the annual emissions from sixty-  
20 six thousand cars.

21 When wetlands are destroyed, that  
22 carbon is released into the atmosphere and the land  
23 loses its ability to store carbon in the future.  
24 Even more concerning is disturbing these wetlands can  
25 also release methane, a greenhouse gas many times

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 more potent than carbon dioxide.

3 And these emissions are not fully  
4 accounted for in Micron's environmental review. And  
5 it's not just about the emissions, wetlands and hot  
6 water streams move nutrients, sediments, and tiny  
7 organisms that keep entire ecosystems healthy.

8 If we remove them, we disrupt food  
9 webs, species balance, and water quality.  
10 Construction activities like clearing vegetation can  
11 heat up nearby streams beyond the tolerance of cold-  
12 water fish and macroinvertebrates.

13 Soil erosion and runoff from disturbed  
14 land can cause harmful algal blooms, releasing  
15 toxins, depleting oxygen in the water, and kill fish.  
16 That also opens the door for invasive species to  
17 spread. These impacts are not fully addressed in the  
18 D.E.I.S. and are lacking in mitigation proposals.

19 There is also more. Amphibians and  
20 reptiles, such as frogs, salamanders, and turtles are  
21 not mobile enough to escape heavy machinery, and this  
22 is stated in the D.E.I.S. and just said, they'll die.

23 The result is mass mortality during  
24 construction, even animals nearby will suffer from  
25 the noise, the lighting, and the changes in the water

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2 quality. These impacts are not fully addressed in  
3 the D.E.I.S., and mitigation measures are lacking.

4 I would like to close with just saying  
5 that this isn't just a loss of land, it is a loss of  
6 climate resilience of biodiversity, and of a living  
7 system that protects us all. Thank you.

8 [Applause]

9 MR. DAVIS: Thank you. If I could ask  
10 everyone to please turn your cell phones to off or  
11 mute -- mute them, please, so they don't interfere  
12 with the speakers, thank you. All right. Bill  
13 Pelkey, and after that is Jim D'Agostino.

14 MR. PELKEY: Yeah, good morning. My  
15 name is Bill Pelkey. I live at 4987 Burbank Road.  
16 Seems to be we got this information a couple of weeks  
17 ago from the -- was it corporate engineers. And  
18 apparently, where the substation is going to be for  
19 National Grid, our house sits right in the center of  
20 it.

21 So I -- I just wanted to ask a  
22 question, where does that leave my wife and I, that  
23 we've -- we've lived there for forty-three years, but  
24 as the match -- the way the map looks, we're right in  
25 the center of it. Thank you.

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2 [Applause]

3 MR. DAVIS: Thank you. Jim  
4 D'Agostino, and after that will be Pat Schaefer.

5 MR. D'AGOSTINO: Good morning,  
6 everyone. My name's Jim D'Agostino. I'm a resident  
7 of Baldwinsville. And I'm the C.E.O. of the Central  
8 New York Technology Development Organization,  
9 otherwise known as T.D.O.

10 We're the local manufacturing  
11 extension partnership center based here in Liverpool,  
12 and we provide technical consulting services and  
13 training across the five county Central New York  
14 region.

15 I'd like to take a moment to express  
16 my personal and professional support for Micron in  
17 their project in Clay, New York. This isn't just a  
18 game changer for the state and for the region, but  
19 also a tremendous opportunity for our local  
20 manufacturing community, as well as, for T.D.O.

21 Micron's investment represents one of  
22 the largest semiconductor projects in U.S. history,  
23 and it's happening right here in Central New York.  
24 This isn't just about one company. It's about a  
25 complete transformation of the regional supply chain,

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2 workforce, and innovation ecosystem.

3 At T.D.O. we exist to support small to  
4 mid-sized manufacturers, Micron's arrival will create  
5 incredible demand for high quality reliable suppliers  
6 right here in our backyard.

7 With the right support and  
8 development, our local manufacturers are perfectly  
9 positioned to become key players in Micron's robust  
10 supply chain, delivering precision parts, automation,  
11 packaging, clean room support, auxiliary services,  
12 and much more.

13 Having personally worked at New  
14 Process Gear years ago, I've had a front row seat for  
15 the exodus of good paying manufacturing jobs in  
16 Central New York.

17 Micron's investment is a turning of  
18 the tides. They're planting a flag right here, and  
19 it's going to continue to attract national and global  
20 attention.

21 With regional support and help from  
22 companies like T.D.O., local manufacturers won't just  
23 benefit from this moment, they'll lead it. This is  
24 why T.D.O. supports Micron's Project in Clay, New  
25 York. Thank you.

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2 [Applause]

3 MR. DAVIS: Thank you. Next is Pat  
4 Schaefer, and after Pat is Dave Caprio.

5 MS. SCHAEFER: Hi, I'm Pat Schaefer at  
6 7225 Myers Road in Syracuse. I wanted to follow up  
7 with what the lady said about the swamps and the  
8 water lands.

9 Paving those over or removing them,  
10 you can't expect all the organisms to pack their  
11 suitcases and move elsewhere. Even if you give them  
12 wetlands someplace else, you're destroying whatever  
13 is there. They are main carbon storage areas and we  
14 should be really careful about how we mess with the  
15 environment.

16 They want to remove the bats. There's  
17 news lately about infectious mosquitoes. We need  
18 every bat we can get. And for Micron to just come  
19 and level the -- the area and pollute the area, we  
20 need to be really careful about what we do to the  
21 land.

22 And that's a lot of wetland and stream  
23 to mess with, and it is federally regulated, so there  
24 should be a reason why it's regulated. I think that  
25 Micron should reformulate its campus and leave those

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 areas alone. That's all I have to say.

3 [Applause]

4 MR. DAVIS: Thank you. Dave Caprio,  
5 and after that is Paul Ossenbruggen. Apologies if  
6 I'm mispronouncing the names.

7 MR. CAPRIO: Hi, good morning. My  
8 name is David Caprio. I'm a Town Of Clay counselor  
9 here in Clay. And this may not be the -- a question,  
10 like that most people would ask, but I have a  
11 concern. And it's more not the -- about the  
12 statement here, but it's more directed to OCIDA.

13 And when I ran for Town of Clay board  
14 last year, I promised everyone, my big thing was  
15 transparency and things like this. I think Micron is  
16 a great opportunity, and I'm looking forward to it.

17 But my question, this is more to OCIDA  
18 is that, they want to have a pilot agreement for a  
19 hotel coming here in the town of Clay, payment in  
20 lieu of taxes. And I told everybody when I ran that  
21 I want to make sure that when Micron comes it  
22 benefits everybody.

23 The citizens of Clay and everything  
24 like that, not just the big businesses and things  
25 coming in. But there is no reason a hotel we've been

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2 hearing for years that we need more hotels in this  
3 area, on Onondaga County.

4 There's no reason OCIDA should be  
5 wanting a payment in lieu of taxes for a hotel. I  
6 could see it if it was a business bringing people to  
7 work and everything in here, but it's just going to  
8 set us slippery slope, I don't believe we've done it  
9 before ever for a hotel.

10 And I just want to make sure that when  
11 everything does come here, businesses and things,  
12 because of Micron, that it benefits everybody. And  
13 not just some certain business owners like a  
14 multinational corporation that wants to build a hotel  
15 here and where they're awarded, something a pilot  
16 agreement when I don't believe it's necessary.

17 Many of my constituents do not believe  
18 so. The other board members do not. And most of the  
19 residents of Clay have brought this up to, everybody  
20 thinks it's a crazy idea, so I'm just letting you  
21 know I do not support that whatsoever, and I've  
22 talked to Ryan McMahon about it.

23 He supports it, I do not, and I just  
24 think it's a -- a crazy idea. So I apologize, this  
25 was a little bit out of ordinary here, but I just

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 wanted OCIDA to know that most -- everybody disagrees  
3 with it except you guys who support it, so thank you.

4 [Applause]

5 MR. DAVIS: Thank you. Next is Paul  
6 Ossenbruggen --

7 MR. OSSENBRUGGEN: Ossenbruggen.

8 MR. DAVIS: Ossenbruggen, and after  
9 that is Sue Gately.

10 MR. OSSENBRUGGEN: I'm Paul  
11 Ossenbruggen. I live in Clay at 4993 Greenberry  
12 Drive. I misinterpreted what I was told at the desk,  
13 my comment is most appropriate be put in as an email,  
14 not as a -- a statement.

15 MR. DAVIS: That's fine.

16 MR. OSSENBRUGGEN: Is that alright?  
17 Thank you.

18 MR. DAVIS: Thank you. Okay. Next is  
19 Sue, and after that is Dan Larson.

20 MS. GATELY: Sue Gately, Sterling, New  
21 York. I'm echoing some of the things that have  
22 already been said. I am concerned about storm water  
23 runoff, if the area really is a six hundred plus  
24 acres and given the expected increase in extreme  
25 weather events, including intense downpours that we

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2 can expect in the near future from climate change.

3 This presents real potential for  
4 flooding, erosion, and a lot of damage to the water  
5 quality downstream. Wetland loss also poses more  
6 potential groundwater depletion risk, and it seems  
7 inevitable that our electricity rates for the general  
8 public are going to be going up.

9 Wastewater discharge is a concern,  
10 it's not very far from the drinking water intake for  
11 OCWA up on Lake Ontario, so is the waste that's going  
12 to be discharged from secondary development  
13 associated with the plant.

14 Wastewater and spills are inevitable.  
15 The plant is apparently located in an area of geology  
16 known as karstic or karst. This poses special  
17 contamination of ground water risk, maybe even  
18 potential subsidence issues, and that should be a  
19 concern in any construction area activity.

20 Contamination can move fast and far in  
21 a karstic aquifer. It can move thousands of feet in  
22 a few hours. So please, one more last comment  
23 quickly, I believe the wetland mitigation appears to  
24 be inadequate, fragmented, and just not up to the  
25 job. Thank you.

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2 [Applause]

3 MR. DAVIS: Thank you. Dan Larson.

4 After Dan is Karen Haas.

5 MR. LARSON: Dan Larson, 498 Main  
6 Street, Sterling. For millennia, humans have banded  
7 together for mutual support and protection. From  
8 that communal urge, we have developed governments  
9 whose main purpose, whatever other purposes they may  
10 serve, is to protect our constituents from harm.

11 Fostering commercial and economic  
12 growth while important must be secondary to ensuring  
13 the health and safety of the population you serve.

14 To allow a commercial enterprise like  
15 Micron to dump unidentified or unknown toxins in  
16 unspecified quantities with unproven and  
17 underdeveloped treatment technologies into our  
18 groundwater supply is a serious abdication of  
19 governmental responsibilities.

20 Micron's D.E.I.S. says that they will  
21 treat their wastewater with state of the art  
22 technology for removing so called forever chemicals,  
23 PFAS and PFAS. However, there is no known technology  
24 that will remove those chemicals on an industrial  
25 scale.

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2 Further, as Professor Niblett pointed  
3 out in her letter to syracuse.com, Micron does not  
4 address how their development or the company surge in  
5 urban growth will raise downstream flooding risk.

6 Micron provides vague promises about  
7 adaptive storm water management, but does not provide  
8 any detailed or specific plans to mitigate downstream  
9 flooding. In short, as several have pointed out or  
10 will point out today, the Micron D.E.S. in its  
11 current form is woefully inadequate to support your  
12 civic oversight responsibilities.

13 Those who say we haven't missed  
14 anything are sadly mistaken. I only ask that you  
15 finish the E.I.S. you've started. Thank you.

16 [Applause]

17 MR. DAVIS: Thank you. Next is Karen  
18 Haas, and then Gwendolyn Muok.

19 MS. HAAS: Hello, I'm Karen Haas. I  
20 reside in Sterling and I represent an organization  
21 called Sterling Water Stewards. We are a grassroots  
22 organization. Primarily our mission is to protect  
23 drinking water.

24 The semiconductor industry uses  
25 forever chemicals, PFAS, and many other hazardous

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 chemicals. Chemicals released into ground or surface  
3 waters have the potential to pollute drinking water  
4 and groundwater, aquifers, streams, and Lake Ontario.

5 PFAS type chemicals are very toxic and  
6 they don't break down. They can cause a variety of  
7 health problems, and they're essential to micro --  
8 microchip manufacture. Their use in microchip plants  
9 is essentially unregulated in New York State at this  
10 point.

11 Work on federal regulation of  
12 microchip facilities has been halted under the  
13 current administration. Micron's D.E.I.S.  
14 acknowledges that wastewater could contain PFAS, but  
15 provides no information on the types or amounts of  
16 PFAS that will likely be present.

17 Micron boldly asserts that the Micron  
18 facility and the plant knew oak orchard treatment --  
19 industrial treatment plant, which Onondaga County  
20 plans to build for Micron will use the latest  
21 advanced treatment technologies, which they list, but  
22 they provide no details on which will be used how.

23 And that they will comply with their  
24 respective Clean Water Act permits. Based on a  
25 promise of permit compliance, Micron asserts that its

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 wastewater discharges will have no significant  
3 environmental impact.

4           Whereas it's a known fact that this  
5 industry, one out of ten PFAS manufacturing plants  
6 has incidence of -- of -- of contamination of  
7 wastewater. Onondaga County's recently constructed  
8 facility to process wastewater sludge is currently  
9 not operating due to toxic air conditions.

10           The county has agreed to design and  
11 build the pretreatment facility for Micron. If  
12 Onondaga County cannot competently build and operate  
13 a facility to process ordinary wastewater into  
14 sludge. How can we trust it to build a pretreatment  
15 facility that will eliminate PFAS and other harmful  
16 chemicals.

17           While there are innovative  
18 technologies that can remove PFAS from wastewater  
19 streams, none of them have ever been deployed at an  
20 industrial scale.

21           Unless Micron can just demonstrate  
22 otherwise, the D.E.I.S. should assume -- the final  
23 E.I.S. should assume that all or a percentage based  
24 on past experience in existing plants --

25           MR. DAVIS: Ten seconds, Karen.

1 7/24/2025 - Micron Semiconductor Manufacturing Project

2 MS. HAAS: -- of PFAS will escape  
3 detection or capture by any industrial wastewater  
4 treatment plant and assess the impacts of its  
5 discharge into the environment.

6 MR. DAVIS: Thank you. Gwendolyn is  
7 next, and then Ben Sio.

8 MS. MUOK: Good morning, I'm Gwendolyn  
9 Muok, president of the Syracuse Onondaga N.A.A.C.P.  
10 The National Association for the Advancement of  
11 Colored People has reviewed the Micron semi --  
12 Semiconductor Manufacturing Project Clay, New York,  
13 draft environmental impact statement.

14 Our review focuses on the project's  
15 potential implications for environmental justice and  
16 the well-being of all communities, particularly those  
17 identified as disadvantaged minority or low income.  
18 There are specific areas of interest and  
19 recommendations that we have, housing affordability  
20 and indirect displacement.

21 The E.I.S. identifies a potential  
22 short term significant adverse effect on housing due  
23 to induced growth, specifically the risk of increased  
24 rents and property values in communities within the  
25 local study area, such as the low-income community in

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 Brewerton.

3 Although the E.I.S. states that  
4 planned housing projects in Micron's coordination  
5 with stakeholders are expected to mitigate this, the  
6 N.A.A.C.P. demands concrete, measurable commitments  
7 to support and expand affordable housing initiatives  
8 to prevent indirect displacement for existing  
9 residents.

10 Transparent plans outlining how Micron  
11 and local agencies will ensure adequate affordable  
12 housing options are available are essential to  
13 prevent displacement of vulnerable populations.

14 Water resources and indigenous  
15 concerns, we note the concerns raised by the Onondaga  
16 Nation regarding fish and water quality in Onondaga  
17 Lake, Lake Ontario, and the Oneida River.

18 While the E.I.S. states that the  
19 preferred action alternative would not result in  
20 significant adverse impacts on water quality or  
21 aquatic life, and proposes mitigation measures such  
22 as a wetland mitigation plan and storm water best  
23 management practices.

24 The unavoidable permanent loss of  
25 approximately one hundred ninety-three point thirty-

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 eight acres of federal jurisdictional wetlands, and  
3 ten point five acres of non jurisdictional wetlands  
4 is a significant environmental impact.

5 We urge continuous transparent  
6 monitoring of water quality and the effectiveness of  
7 all mitigation efforts with active involvement and  
8 affected communities including indigenous nations in  
9 the oversight process.

10 Beneficial effects and community  
11 investment fund, we acknowledge the projects --

12 MR. DAVIS: Ten second, Gwendolyn.

13 MS. MUOK: -- beneficial effects and  
14 we would demand transparency in the allocation and  
15 impact of these funds.

16 [Applause]

17 MR. DAVIS: Thank you. Next is Ben  
18 and after Ben is Susan Crossett.

19 MR. SIO: You don't want to try and  
20 pronounce my last name?

21 MR. DAVIS: Sio.

22 MR. SIO: You're pretty good.

23 MR. DAVIS: Thank you.

24 MR. SIO: Not bad. Hi, I'm Ben Sio,  
25 I'm with Center State C.E.O., we are a Regional

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 Chamber of Commerce and Economic Development  
3 Organization here in Central New York. You'll hear  
4 from a number of companies and community partners  
5 today speaking about their excitement with the  
6 project.

7 I have two brief messages for you and  
8 for the folks in this room. And the first one is  
9 hope, right? Central New York has been beaten down a  
10 lot. Upstate New York has been beaten down a lot, we  
11 don't always win.

12 And the idea that we have the  
13 opportunity to win here with the Micron Project is  
14 massive. I was, yesterday morning, with the Deputy  
15 Mayor in Downtown Syracuse at an M.W.B.E. forum.  
16 There are over two hundred individuals, mostly from  
17 minority women owned businesses, who want to work in  
18 the Micron Project attending that session.

19 They're excited about it. They see  
20 opportunity for them. They see opportunity to build  
21 wealth for them and for their employees. We need to  
22 make sure that happens. Also, I was at a bank last  
23 night talking with their board about the project.

24 And there was skepticism about whether  
25 or not it happened, it happened on time, but there

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 was also excitement. The bank wanted to win. The  
3 bank wanted to bring more capital into the market,  
4 and the bank wanted to support the businesses and we  
5 know will hire because of this.

6 So hope, let's not forget that this  
7 project has given our community, all of you, even if  
8 there are concerns, hope and what we can do in  
9 Upstate New York.

10 The second message I want to deliver,  
11 and this is something that was in the paper this  
12 morning with a letter to the editor signed by over a  
13 hundred business members and nonprofit members, that  
14 Central New York is the best place in the country to  
15 build these four fabs.

16 I'll say that again, we are the best  
17 place in the country to build these four fabs. We  
18 have the best environmental regulations that we're  
19 talking about a lot today to make sure that this  
20 project is done well.

21 We have the coalitions that have  
22 already come together to be in training individuals  
23 to work in these fabs. We have the community  
24 investment framework that was mentioned earlier that  
25 will invest in mitigating negative impacts from this

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 work and accelerating positive things coming out of  
3 this.

4 I have two kids. I grew up in Central  
5 New York. I want my kids to stay in Central New  
6 York. I want them to be excited, not just about what  
7 dad goes to work on every single day, but that they  
8 see opportunity for themselves when they get old or  
9 older, let's say.

10 When they get older and -- and  
11 graduate, I want them to stay, I want our kids to  
12 stay, and I want their kids to stay. So I'm happy to  
13 offer our support. And please let us know if we can  
14 do anything else to continue that support. Thank  
15 you.

16 [Applause]

17 MR. DAVIS: Thank you. Next is Susan  
18 Crossett, after Susan is Greg Lancette.

19 MS. CROSSETTE: Hi, I'm -- I'm kind of  
20 short. Good morning, I'm Susan Crossett. I'm the  
21 C.E.O. and owner of Sapphire Recruitment here in,  
22 Central New York. A thirty-five year old business  
23 working to develop talent and match that great talent  
24 with our employers.

25 This morning I'd like to comment a

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 little bit on -- on the project and as you know, I  
3 think everybody's experiencing, Central New York is  
4 in experiencing a bit of a renaissance. One that  
5 many of us had hoped for, but many were skeptical  
6 would it even come.

7 What was once a very vibrant  
8 industrial region with good paying jobs at companies  
9 like General Electric, Smith Corona, Syracuse China,  
10 and others became another rust belt region with more  
11 jobs in health care than any other industry.

12 Our local leaders really worked  
13 tirelessly to attract new investment that would  
14 create jobs and provide opportunities for our  
15 residents and keep our young people here as Ben said  
16 earlier.

17 The White Pine Commerce Park in Clay  
18 was an ideal site for that development. The county  
19 had a vision for that site. One that meant taking  
20 the long view of what might be possible and  
21 developing a strategy to attract companies in the  
22 semiconductor industry.

23 They certainly had their setbacks. It  
24 was discouraging to lose opportunities to other  
25 regions and other states when we had the necessary

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 resources, including an educated workforce, top  
3 universities and colleges, electric and gas  
4 infrastructure with exceptional power quality and  
5 excess capacity, water and land needed for industrial  
6 -- for the semiconductor industry.

7           When Micron announced their plans to  
8 build a state-of-the-art dynamic random access memory  
9 semiconductor manufacturing facility here, that's a  
10 mouthful, our future really began to brighten.  
11 Micron was exactly the right partner that our region  
12 wanted to realize our vision with.

13           New York State has long been the  
14 leader of protecting our environment. It is part of  
15 who we are. It is part of something we should all be  
16 proud of. Our environmental laws and regulations  
17 have often been used against us by other states  
18 trying to attract business.

19           Micron was not deterred. The CHIPS  
20 office and OCIDA prepared to draft environmental  
21 statement to evaluate all the potential impacts, and  
22 they included state and federal agencies and all  
23 interested parties along with a number of public  
24 hearings.

25           More than twenty, actually,

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 participated in the process. They studied the impact  
3 of the project on a long list of areas, including  
4 water quality and resources, land use, air quality,  
5 climate, solid waste, human health safety, utility  
6 infrastructure, transportation noise, environmental -  
7 -

8 MR. DAVIS: Ten seconds.

9 MS. CROSSETTE: -- and other issues.  
10 The Micron Project will generate approximately nine  
11 thousand jobs, and forty thousand additional jobs.  
12 That's what we need. Thanks.

13 [Applause]

14 MR. DAVIS: Thank you. Next is Greg  
15 Lancette, and then Jeff Norensky.

16 MR. LANCETTE: Good morning. I stand  
17 here today as the president of the Central and  
18 Northern New York Building and Construction Trades  
19 Council president representing almost ten thousand  
20 workers in the region.

21 A few years ago, when Micron announced  
22 that they chose our site, of course everybody was  
23 ecstatic and elated with that. But what that meant  
24 to us is the community with hard hats, with tools in  
25 their hands, is that we have decades of opportunities

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 for not only our current members, but also our future  
3 members for the next generations to come to learn,  
4 work, stay, and play in Central New York.

5 In our industry, the jobs don't always  
6 get built in your backyard or in your community. I  
7 had raised my family in the town of Clay. Our  
8 children graduated from Cicero, North Syracuse High  
9 School.

10 We still have one in school that's on  
11 that path to have this opportunity where trades and  
12 craft workers of today and tomorrow will not have to  
13 go hundreds of miles away from home to earn a  
14 paycheck and maintain their health insurance, to work  
15 on a cutting edge, global leading advanced  
16 manufacturing technology.

17 Not only the sector, but the  
18 technology that is being brought and engineered into  
19 these fabs are industry leading world class. So, we  
20 are talking about STEM and STEAM, C.T.E. programs in  
21 the educational world, all of that -- that Micron  
22 opportunity that we support that brings a tangible,  
23 relatable, touchable project where you can apply all  
24 of the science technology, the engineering and  
25 everything else.

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2                   There has been hundreds of people  
3 working for the last couple of years on the scaling,  
4 the preparation of our training programs, of our  
5 recruitment cycles with our community partners.

6                   It is a grander scale of what the  
7 building trades has been doing leading up to the  
8 replacement of Interstate 81, where there are  
9 community partners, community opportunities.

10                   And there is quite a cohesive group  
11 with our community where people that are having  
12 opportunities to work in the construction industry  
13 from the neighborhood where the project is.

14                   This is just a continuation of that,  
15 where our community has an opportunity, where our  
16 children can grow up, educate, work, and stay in  
17 Central New York instead of the continuous out  
18 migration that we have been in -- in this community  
19 for the last three decades.

20                   This is an opportunity where so many  
21 earners of wages --

22                   MR. DAVIS: Ten seconds.

23                   MR. LANCETTE: -- there is going to be  
24 a lot of first time opportunities for generational  
25 wealth and work opportunities in a community that

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 does not have many. Thank you.

3 [Applause]

4 MR. DAVIS: Thank you. Next is Jeff  
5 Norensky.

6 MR. NORENSKY: Here.

7 MR. DAVIS: And on deck is George  
8 Lorefice.

9 MR. NORENSKY: Hello. My name is Jeff  
10 Norensky. I live on Fuchsia Path in Clay, which is  
11 right off of Caughdenoy. I'm listening to many  
12 people talking about the environment, which I do have  
13 concerns.

14 But my concerns are not exactly where  
15 the bats live and the bear -- and the bears live,  
16 although I think we should have to take them into  
17 consideration. I'm more concerned about the road  
18 between Maple Drive and Route 31.

19 There's a rural road, it's two lanes.  
20 It doesn't have a shoulder. It has a very deep  
21 drainage ditch next to it. It has a lot of kids and  
22 people jogging and walking and biking on the road.

23 More recently, I've seen that there  
24 are quite a few kids that have electric bicycles or  
25 they have electric scooters or they can stand on

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 something and that looks like they're -- you know,  
3 that there's nothing underneath them, other maybe  
4 than some skates.

5 But they seem to be going at twenty or  
6 twenty-five miles an hour, which I'm not sure is  
7 safe. But if we put five hundred trucks going to  
8 Micron, they were either coming on Route 81 or 481.  
9 The only exit that I know that is real close to  
10 Micron on 481 is Caughdenoy Road.

11 The people are going to go the  
12 quickest way they can get there. If there's  
13 congestion off of 81, they're going to be on  
14 Caughdenoy Road. Again, it's a two-lane road. It  
15 doesn't have a shoulder. It's a rural road and it  
16 has kids driving bikes and people walking on it all  
17 the time.

18 I'm hoping you're going to put some  
19 bike paths in or do other things to help the  
20 environment there so people can live a safe life and  
21 not be amongst all this traffic. Thank you.

22 [Applause]

23 MR. DAVIS: Thank you. Next is  
24 George. George, sorry for the last name if I  
25 mispronounced it. And then next after George is

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 Jamie Shinn.

3 MR. LOREFICE: I'm George Lorefice.

4 MR. DAVIS: George, if I could ask you  
5 to try to speak into that mic a little bit. That  
6 will help --

7 MR. LOREFICE: All right.

8 MR. DAVIS: -- with the recording.

9 UNIDENTIFIED MALE SPEAKER: Yeah,  
10 powered off.

11 MR. DAVIS: Just a second.

12 MR. LOREFICE: Okay. Here we go. I  
13 am George Lorefice, a resident of Manlius New York,  
14 and also president of Climate Change Awareness and  
15 Action. It's -- we're a local group located here in  
16 Central New York.

17 A concern of ours is in -- on the  
18 energy usage of Micron, specifically their fossil  
19 fuel use. And we would like to see how they're going  
20 to do the reduction in their fossil fuel use.

21 As a start, one of the ideas came up  
22 was using solar on -- on a lot of your roof area and  
23 some of the other areas to reduce some of that usage.  
24 And we'd like to see more specificity in -- in how  
25 you may reduce your energy use.

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 Micron can be an asset to our  
3 community if they take care to protect our  
4 environment, as you heard before. Thank you.

5 [Applause]

6 MR. DAVIS: Thank you. Next is Jamie,  
7 and after Jamie is -- is it Michael --

8 MS. SHINN: Check. One, two.

9 MR. DAVIS: -- Mikulewicz, sorry, that  
10 one's tough, M-I-K-U-L-E-W-I-C-Z.

11 MS. SHINN: I'm glad mine was easier  
12 for you.

13 MR. DAVIS: Yes.

14 MS. SHINN: Hi, I'm Jamie Shinn. I'm  
15 a professor at the SUNY College of Environmental  
16 Science and Forestry, but I actually -- while I have  
17 several environmental concerns, want to talk about  
18 something different today though related.

19 I want to talk about the difference  
20 between the opportunity for public participation and  
21 true community engagement. So, I appreciate this  
22 opportunity today and that everybody is taking the  
23 time to be here.

24 I'm more interested in who is not in  
25 this room and who won't be in this room today because

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 they're not able to, because of transportation  
3 barriers, childcare barriers. They don't have the  
4 time or they just don't know that they have a voice  
5 at this table.

6 If Micron is meant to be truly the  
7 economic driver or the driver of economic  
8 transformation that it promises to be and that I have  
9 a belief that has the potential to be, then we need  
10 greater actual engagement with the communities that  
11 require that transformation, including those in the  
12 City of Syracuse where I live, who suffer from the  
13 highest rate of child poverty in the country and one  
14 of the most difficult and least accessible housing  
15 markets in the country.

16 Do you know their concerns? If not,  
17 why? How can this project engage with those  
18 communities if we don't know what their concerns are?  
19 I appreciate in the D.E.I.S. that you talk about  
20 engaging in robust public outreach, that's a direct  
21 quote, but only two such community engagement  
22 meetings are listed.

23 Forty-five people were said to be in  
24 attendance, but there's no mention of what concerns  
25 were raised and how those concerns were addressed

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 afterward in the D.E.I.S.

3 If we don't have that level of  
4 transparency, I don't believe we have trust that  
5 there's true community participation happening. And  
6 so, I think we need opportunities to maximize the  
7 engagement for those communities that most require  
8 the transformation that's promised by this project.

9 At the very least, we need commitment  
10 and a requirement that Micron has a community  
11 advisory panel that is there to foster and oversee  
12 truly authentic and ongoing community participation  
13 to make sure that the voices who can't be in this  
14 room today are at the table moving forward. Thanks.

15 [Applause]

16 MR. DAVIS: Thank you. Michael. And  
17 after Michael is Desiree Matthews.

18 MR. MIKULEWICZ: Hi, I'm Dr. Michael  
19 Mikulewicz. I'm a professor at SUNY E.S.F., and I'm  
20 here -- but I'm here as a concerned resident of the  
21 City of Syracuse. My comment pertains to the  
22 environmental justice impacts of this development.

23 For those who may not be aware of what  
24 it is, environmental justice is concerned with the  
25 unequal environmental impact caused by developments

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 like this one on historically marginalized and  
3 underserved communities and individuals.

4           Meanwhile, the D.E.I.S. states, the  
5 preferred action alternative would not result in any  
6 significant adverse effects with respect -- with  
7 respect to these policies, nor would it have any  
8 environmental justice impacts.

9           It would likely result in beneficial  
10 effects by fulfilling economic development policy  
11 goals. Further, the D.E.P.24-1 form submitted to the  
12 Department of Environmental Conservation States, it  
13 can be reasonably concluded that many of the  
14 disadvantaged communities and minority or low income  
15 communities within the study area would be unaffected  
16 by this development.

17           First, it is unreasonable to assume  
18 that one of the largest investments in the history of  
19 this region will have no adverse environmental  
20 justice impacts. That statement is naive at best and  
21 cynical at worst.

22           Second, Micron claims that the  
23 development will have no such impact based on the  
24 study impact area, which has been set to a five-mile  
25 radius narrowly missing multiple disadvantaged

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 communities in North Syracuse, Liverpool, and the  
3 city of Syracuse, among others.

4 Moreover, the impact of connected  
5 actions, the water supply and discharge  
6 infrastructure and electricity infrastructure has  
7 been limited to point five miles, including the  
8 pumping station in Oswego, which sits right in the  
9 middle of communities designated as disadvantaged by  
10 New York State.

11 Micron must increase the impact radius  
12 and resubmitted D.E.P.24-1 form to the D.E.C. to  
13 reflect this. Ultimately, this should trigger  
14 enhanced participation, which as my colleague  
15 mentioned, has not been sufficient.

16 The last comment I would like to put  
17 on record, which would -- should in no way be taken  
18 personally by this -- by the representatives present  
19 here, is that the diversity of the panel facing us  
20 today does not instill me as an individual with  
21 optimism regarding the ability of this project to  
22 appreciate and adequately address the needs and  
23 concerns of the diverse population that our region is  
24 home to. Thank you.

25 [Applause]

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2 MR. DAVIS: Thank you. Next is  
3 Desiree Matthews, and after Desiree is Brian  
4 Bouchard.

5 MS. MATTHEWS: Hi, good morning,  
6 everyone. Desiree Matthews. I represent the Lee and  
7 the Matthews family. We have property interests off  
8 of Henry Clay Boulevard, which does include obviously  
9 a riverfront and waterfront community.

10 We do support Micron and the  
11 investment that it has in this community. I work in  
12 mental health and we know that having jobs, income,  
13 stability is so very important.

14 So, we certainly support Micron, but  
15 also, we have to think about those people in the  
16 riverfront communities. I'm actually very shocked  
17 that the property values are still so depressed on  
18 some of those properties.

19 I've been all the way over the country  
20 and usually the riverfront waterfront properties have  
21 the highest value, but unfortunately, basic services  
22 like sewer, they don't have it.

23 And we know that these riverfront  
24 homes could provide extra taxes, development. They  
25 could be beautiful, but having public access is so

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 important. So, thinking about those septic systems  
3 that are there, they are old, they are ancient.

4 They probably need to be ripped out,  
5 but we know these engineering systems are so  
6 expensive and if people can't sell their home for,  
7 you know, an adequate resale value, we're going to  
8 continue to see those property values very depressed.

9 We can attract investment. We can  
10 have cheaper connections, and we want to make sure  
11 that with Micron we're getting those riverfront  
12 properties and having access along with the  
13 properties that are already slated in the phase one.

14 So, I don't have that information if  
15 those properties are going to have sewer access, but  
16 I think it's really important because it's going to  
17 cost us a lot more in the long run. So, thank you  
18 guys and thank you for consideration.

19 [Applause]

20 MR. DAVIS: Thank you. Brian  
21 Bouchard, and after Brian is Keanna Serviss.

22 MR. BOUCHARD: Good morning, Brian  
23 Bouchard with C.H.A. Consulting. I'm a civil  
24 engineer with eighteen years of experience focused in  
25 commercial and residential land development projects,

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 primarily in Central New York, but also across the  
3 country.

4 Here speaking in support of the  
5 D.E.I.S. and the process to identify and mitigate any  
6 potential significant environmental impacts related  
7 to the project.

8 C.H.A. Consulting is a highly  
9 diversified engineering firm and is writing to  
10 express support for the Micron, New York  
11 semiconductor manufacturing project in the town of  
12 Clay based on the draft environmental impact  
13 statement.

14 C.H.A. has served the Central New York  
15 region for decades with deep expertise, unwavering  
16 commitment, and shared vision for sustainable growth.  
17 Our roots in this community run deep, and we have  
18 witnessed firsthand the transformative power of  
19 strategic investment paired with responsible  
20 planning.

21 The Micron Project represents a  
22 generational opportunity that promises to revitalize  
23 our local economy. Create thousands of high paying  
24 jobs, and position the region as a national leader in  
25 advanced manufacturing and innovation.

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2 We are especially encouraged by  
3 Micron's proactive approach to environmental  
4 stewardship, including its commitment to purchase  
5 carbon free electricity, water conservation, and  
6 inclusion of community centered infrastructure,  
7 including childcare, healthcare, and recreational  
8 facilities, which thoughtfully balanced economic  
9 growth with environmental responsibility and  
10 community wellbeing.

11 As a longstanding partner in the  
12 region's development, we stand ready to support the  
13 project in any way we can. This initiative aligns  
14 perfectly with the values we've upheld for decades,  
15 innovation, sustainability, and shared prosperity.

16 We support the timely advancement of  
17 Micron Project and recognize the profound benefits it  
18 will bring to our community and beyond. Thank you.

19 [Applause]

20 MR. DAVIS: Thank you. Keanna. And  
21 then after Keanna is Don Hughes.

22 MS. SERVISS: Hi, Keanna Serviss. I  
23 live on 31 in Cicero. I have a lot of environmental  
24 concerns that a lot of people have already brought  
25 up. And then one of them addressed, back in 2014 in

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 the Manassas in Virginia, where a Micron plant had  
3 already been established.

4 There was a news article about  
5 residents complaining about the smell of like rotten  
6 eggs and soiled sewage coming through the city. So  
7 basically, hydrogen sulfide is created at the micron  
8 manufacturing process that discharges the odor when  
9 the chemical transforms from a liquid to a gas.

10 And so, like between the runoff water  
11 that was pooling in this pond that's kind of a  
12 storage is also seeping into their sewage, and the --  
13 that city was treating the pond water and trying to  
14 control the release of it into their sewer system.

15 And I'm sure there were other  
16 chemicals within that. And so, since that actually  
17 happened at a Micron plant in another part of the  
18 country, I'd like to know like, what are the -- what  
19 are they going to do to like, be proactive and  
20 prevent that kind of thing happening here.

21 Like, I wouldn't want to live amongst  
22 the smell and I'm sure a lot of other people  
23 wouldn't. That's it.

24 [Applause]

25 MR. DAVIS: Thank you. Next to Don

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 Hughes. And then after that we have an individual  
3 that has identified himself as John Doe.

4 MR. HUGHES: Okay. Well, hi, my name  
5 is -- is Don Hughes. I'll try not to break this.  
6 So, I am a longtime resident of Syracuse since 1985,  
7 and I volunteer with the Sierra Club and with a  
8 coalition of groups, fourteen local groups called  
9 SustainCNY.

10 And my first comment to you is about  
11 this public comment period, allowing only forty-six  
12 days for the public to read, digest, and develop  
13 comments on twenty thousand pages of text, technical  
14 texts with tables and figures is simply inadequate.

15 And I hear what you folks are saying  
16 about the opportunities of Micron and jobs and  
17 development, but I find it troubling that the  
18 agencies and Micron have chosen to limit the public  
19 input period with the minimum public comment period.

20 One set of public hearings today, if  
21 you wanted to engage the public, you would follow the  
22 example of the New York State Department of  
23 Transportation in soliciting input for the E.E.I.S.  
24 on Interstate 81.

25 And that project, we had multiple

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 public engagement sessions over a year. That was  
3 what -- that's a model that you should follow.  
4 Number two, in contrast what a previous speaker said,  
5 the White Pine Commerce Park is actually a terrible  
6 place to build a huge CHIPS factory.

7 It is home to endangered bats,  
8 threatened species of birds, hundreds of other  
9 creatures, hundreds of acres of high quality wetlands  
10 and forests. Flooding is already an issue in Clay.

11 Putting hundreds of acres close to a  
12 thousand acres of impervious services in its place is  
13 going to exacerbate that problem. In the time I got  
14 remaining, I just want to talk about chemicals.

15 So, semiconductor manufacturing uses a  
16 lot of chemicals, many of which are highly toxic. A  
17 table in the D.E.I.S. lists hazardous chemicals,  
18 flammable chemicals, pyrophoric, those are the ones  
19 that spontaneously catch fire and expose to air.

20 Corrosives, toxic gases, oxidizers,  
21 asphyxiants, flammable liquids, water reactive  
22 substances, a lot of chemicals, chemicals going to be  
23 moving into this plant by truck.

24 What about spills? Spills are simply  
25 -- trust us, that's what the document says. Trust

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 us, we're going to develop a spill control plan. But  
3 accidents happen. They will happen over the course  
4 of this -- of this project as it's being built and as  
5 it goes into operation.

6 MR. DAVIS: Ten seconds.

7 MR. HUGHES: I did a calculation, how  
8 much chemicals will be on site, fifty-five million  
9 gallons if this whole project is built. That's a lot  
10 of chemicals.

11 [Applause]

12 MR. DAVIS: Thank you. Next is John  
13 Doe.

14 MR. DOE: Thank you. Good morning.  
15 Appreciate the opportunity to speak here today. I've  
16 heard a lot of comments about the endangered species  
17 that occupy the proposed build site. You got the  
18 harrier hawk, the Indiana bat, and the short-eared  
19 owl.

20 Indiana bat and the harrier hawk are  
21 protected under federal migratory bird laws, Wildlife  
22 Conservation Acts of 1956 and '73. The previous  
23 speaker brought up the storage of fifty-five million  
24 gallons of corrosive chemicals on what basically is a  
25 wetland.

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 Cicero swamp's less than six miles  
3 from the build site. Oneida Lake's probably within  
4 fifteen miles. So, I oppose the building site. And  
5 basically, Micron's getting a two hundred and forty-  
6 nine-million-dollar tax break sped out over forty-  
7 nine years.

8 And they expect us, the taxpayers to  
9 bear the brunt of the price of the infrastructure.  
10 The I-81, 481 Conrail, National Grid, Sunday's paper  
11 last week, national grid's already looking at a  
12 twenty percent rate increase to help pay for what  
13 obviously is the infrastructure that Micron will  
14 require.

15 I don't think it's a good idea to  
16 build on a site where those endangered species occupy  
17 underground caves, which would be tainted by chemical  
18 spills. And then Micron offered fifty million  
19 dollars for bat research.

20 In my opinion, take your fifty million  
21 dollars and go find another build site. Thank you so  
22 much. Have a good day.

23 MR. DAVIS: Thank you. For the record  
24 for our stenographer, Mr. John Doe refused to provide  
25 his real name, so I just -- if we could put that in

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 the record, please. Thank you. Excuse me. No  
3 profanity, thank you. Excuse me. There are -- there  
4 are no other speakers that have filled out a comment  
5 card.

6 If you would like to speak and you've  
7 not filled out a common card, please come to the  
8 front and state your name. I would like to have new  
9 speakers that have not spoken yet, that can up and  
10 state your name and where you're from, please. And  
11 we'll go with that. Thank you.

12 [Applause]

13 MR. PRZEPIORA: Thank you very much.  
14 For the record, I did fill out a comment card. Don't  
15 know what happened, but --

16 MR. DAVIS: Can you repeat your name  
17 again?

18 MR. PRZEPIORA: I'm -- yes. My name  
19 is John Przepiora. I reside in the city of Syracuse.

20 MR. DAVIS: Thank you, John.

21 MR. PRZEPIORA: Major components of  
22 this project deserve public scrutiny of at least  
23 thirty to forty-five days. To lump it all together  
24 into one is irresponsible.

25 These multi components lump together

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 with this project's overlapping multiple phases make  
3 the D.E.I.S. difficult for anyone, including the most  
4 intelligent and experienced planning and development  
5 expert to review, understand and respond within the  
6 forty-five or forty-eight days that have been  
7 allowed.

8 Please revise the public comment  
9 period to at least a hundred and twenty days until  
10 October 23rd. I was planning here to -- to come and  
11 talk about the socioeconomic conditions, especially  
12 about the real estate, housing and growth inducing  
13 effects.

14 But I - I -- I decided to just come  
15 here today to talk about my opinion about this  
16 project. And it is my opinion based on the  
17 environmental impacts associated with this project  
18 that the project must not go forward without major  
19 changes.

20 I've come to this conclusion after  
21 consideration of such things as the project will  
22 destroy a critical ecological resource by filling the  
23 White Pine wetlands that serve many useful purposes,  
24 which aren't thoroughly assessed in the D.E.I.S.

25 We are in the era of climate crisis

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 with heat disrupting people's lives in profound ways.  
3 This site is a sink not only for carbon -- to keep  
4 carbon out of the atmosphere, but serves as an air  
5 conditioner to cool the surrounding environment and  
6 the bathtub to keep flooding in check.

7 Adding a huge concrete factory and  
8 surrounding pavements only adds to the heat island  
9 effect. Construction activity will impact the  
10 surrounding area for years to come with noise and  
11 traffic, which could make the area an intolerable  
12 location on which to live.

13 Once operational, the twelve thousand  
14 car parking lot will impact residents in the  
15 surrounding area by attracting increased automobile  
16 traffic.

17 The development is proposed to solve  
18 the region's longstanding poverty, yet there is no  
19 assurance that local workers and local residents will  
20 reap the benefits purported to be an objective of the  
21 project.

22 The project that workers -- the  
23 projection that workers will immigrate to the region,  
24 increasing the population by over sixty-four thousand  
25 and adding twenty-seven thousand new households flies

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 in the face of the promise that the good paying jobs  
3 will come to local residents.

4 There is also no assessment, nor  
5 assurance that the induced rising housing costs will  
6 not adversely affect the city of Syracuse.

7 MR. DAVIS: Ten seconds.

8 MR. PRZEPIORA: The renters who, you  
9 know, currently are cost burden. Gentrification with  
10 attendant displacement and increased homelessness is  
11 a potentially adverse impact, which is not  
12 sufficiently addressed in the D.E.I.S. Thank you.

13 [Applause]

14 MR. DAVIS: Thank you. Are there any  
15 other speakers that would like to come forward and  
16 speak?

17 MR. DOODY: Yeah. Yeah, my apologies  
18 for not filling out a card here.

19 MR. DAVIS: That's okay. If you could  
20 just state your name --

21 MR. DOODY: Sure. Yes.

22 MR. DAVIS: -- and maybe spell it since  
23 we do have the cards for spelling for our  
24 stenographer here, so if you could spell it for her.  
25 That would be helpful.

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2 MR. DOODY: Sure thing. My name is  
3 Paul Doody, that's D-O-O-D-Y. I'm a retired chemical  
4 environmental engineer, living in Baldwinsville. I  
5 spent the last thirty-five years of my career as a  
6 consulting engineer, cleaning up legacy contamination  
7 at hazardous waste sites, with the early part of my  
8 career spent as a chemical environmental facilities  
9 engineer at I.B.M. Semiconductor facility in East  
10 Fishkill New York.

11 So, I've seen what can go wrong, and I  
12 want to make sure this job is done right from the  
13 beginning. So, I do have a number of comments. While  
14 there are twenty thousand pages in the E.I.S.,  
15 there's inadequate detail with which to truly assess  
16 the potential for significant adverse environmental  
17 effects.

18 As an example, I could not find  
19 anywhere in the E.I.S. a listing of all the chemicals  
20 and quantities planned to be used at the facility.  
21 As such, we can't independently assess whether the  
22 conclusions about wastewater and air discharges, as  
23 well as, waste management and health and safety are  
24 reasonable.

25 Also, the public deserves to know what

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 chemicals will be transported along our roadways,  
3 increasing the risks to the community. Probably my  
4 most important comment is, there's only a very  
5 superficial discussion about spills, system upsets  
6 and equipment malfunctions that can result in  
7 contamination of building materials, soil,  
8 groundwater, surface water in the atmosphere.

9 The report only provides very brief,  
10 simplistic statements that spills will be quickly  
11 cleaned up and there will be spill kits available.

12 One area of particular concern I have  
13 is related to a release that could enter the Oneida  
14 River eventually discharging to Lake Ontario.

15 The Oswego River mouth is not too far  
16 from OCWA's water intake, potentially resulting in  
17 contamination of our multi-county water supply. More  
18 discussion and recognition of this potential risk is  
19 critical.

20 I would recommend a thorough  
21 vulnerability assessment or risk management approach  
22 to more fully assess the risk of spills, their  
23 consequence and appropriate mitigation measures such  
24 as additional potable water treatment, for example.

25 I recommend the public actively

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 participate in such an assessment as we will be  
3 accepting a lot of those risks. Now, on that topic,  
4 I also would recommend that a community oversight  
5 council be developed that has equal authority and a  
6 seat at the table with other oversight agencies to  
7 review the project.

8 It's likely many things are going to  
9 change over the nearly twenty-year period of  
10 construction and fifteen years of operation. We're  
11 inevitably going to learn more and technologies are  
12 going to be developed warranting ongoing review and  
13 adjustments.

14 As such, an adaptive management  
15 program with active public involvement should be  
16 implemented. And finally, it appears the traffic  
17 analysis did not consider the traffic delays during  
18 construction of the proposed traffic improvements.

19 The summary charts show traffic  
20 impacts in 2027 and 2031, yet the text states that  
21 the planned traffic improvements will begin after  
22 2027 and be completed by 2031. Therefore, the  
23 conclusions --

24 MR. DAVIS: Ten seconds.

25 MR. DOODY: -- about delays ignore the

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 inevitable traffic headaches during the construction  
3 of those improvements. Thank you very much.

4 [Applause]

5 MR. DAVIS: Thank you. Any other  
6 speakers wish to come forward? Please state your  
7 name and spell it, please.

8 MR. JENNEJAHN: Yes, Rick Jennejahn,  
9 J-E-N-N-E-J-A-H-N. I live in Baldwinsville. I'm a  
10 thirty-four-year member of the area. So, I am  
11 supportive of the Micron development program or  
12 project here.

13 Just to echo what the last speaker  
14 just said, I think the traffic concern is something  
15 that needs to be looked at now versus later. Already  
16 on Route 31, the corridor between Route 31 and 11,  
17 that intersection is very difficult for residents in  
18 the area.

19 My family lives in Cicero, in  
20 Brewerton, in Central Square in -- in that area --  
21 and as well. And so, I think it's very, very  
22 concerning to -- to see that the traffic mitigation  
23 isn't going to happen until years down the road. So,  
24 that would be my comment on that.

25 Secondly, I think the -- the other

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 aspects that were spoken about today, particularly  
3 the chemical concerns, the environmental concerns, I  
4 -- I have read through as much of the -- the state --  
5 draft statement as possible.

6 I do think that there needs to be a  
7 little bit more transparency on the -- the chemicals.  
8 I think that's a pretty big concern. So, just  
9 supportive of the project and thank you for what  
10 you've done here today. Thank you.

11 [Applause]

12 MR. DAVIS: Thank you. Any other  
13 speakers that have not spoken? Yes, please come  
14 forward.

15 MR. DAMICO: Sam Damico, D-A-M-I-C-O.  
16 I had no intentions in speaking until I heard about  
17 all the chemicals. I own a property across from the  
18 -- the site. It's -- we're going to build a fourth  
19 fab.

20 There's no public water available to  
21 the property. I don't feel comfortable having a well  
22 after I've heard everything that's being discussed  
23 today about the chemicals.

24 So, I'm hoping that Micron or Onondaga  
25 County can assure us that we'll get access to public

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 water if we live around the project. I haven't heard  
3 that being discussed yet. They're getting a lot of  
4 water. We would like some public water as well.  
5 Thank you.

6 [Applause]

7 MR. DAVIS: Thank you. Any other  
8 speakers who have not spoken and would be interested  
9 in speaking?

10 MR. BULLA: Yes. Name is Joe. Last  
11 name is Bulla, B-U-L-L-A. I just want to say one  
12 thing. This whole project seems to have the cart in  
13 front of the horse. Nobody did all this  
14 investigating and everything before we had this great  
15 announcement that Micron was coming here.

16 It's a wetland. How can we demolish a  
17 wetland and where are we going to create the -- the  
18 new wetland to supplement taking all that out of the  
19 -- the ecosystem, it makes absolutely no sense.

20 [Applause]

21 MR. DAVIS: Thank you. Any -- other  
22 speakers, again, reminder that you don't need to  
23 speak for your comments to be provided here. Written  
24 comments are the same as spoken comments here today.

25 So, if you're uncomfortable speaking,

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 you can provide a written comment. If you have it  
3 with you, it can be provided to someone in the lobby  
4 or up here at the front desk. We can take it, or you  
5 can -- on the back behind us here is an -- identifies  
6 the opportunities where you can provide your written  
7 comment.

8 Any other speakers who have not  
9 spoken? Okay. I'm going to open it up to any  
10 speakers who would like to speak a second time.  
11 There were a few that got cut off at the three-minute  
12 limit. So, as I said at the beginning of the  
13 session, speakers are afforded another three-minute  
14 opportunity.

15 So, if there's someone that would like  
16 to come forward that has spoken already and would  
17 like to have that opportunity, please come forward.  
18 Just please restate your name again and your address  
19 so we can have it for the record to track that.  
20 Thank you.

21 MS. HAAS: Hi, I am Karen Haas, 498  
22 Main Street, Sterling, New York. I'm representing  
23 Sterling Water Stewards. So, I had gotten to the  
24 point that unless Micron can demonstrate otherwise,  
25 the D.E.I.S. needs to assume that PFAS will escape

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 detection or capture by an industrial wastewater  
3 treatment plant and assess the impacts of discharge  
4 into the environment.

5 And -- and they could actually cite  
6 how much PFAS escapes from existing facilities  
7 because it is known. For example, the global  
8 industries microchip factory in Malta, New York is  
9 known to have PFAS discharge -- discharges that are  
10 not being addressed by D.E.C. at this point.

11 Micron should be required to provide  
12 data on the pollution reduction that can be achieved  
13 by its -- its state-of-the-art controls and assess  
14 the impacts of the resulting emissions discharges  
15 directly.

16 They should commit to using treatment  
17 and monitoring technology that assures that no PFAS's  
18 are released into the United -- the Oneida River or  
19 other bodies of water, including Lake Ontario.

20 The D.E.I.S. states, oh, there's going  
21 to be a plume that's going to have some stuff in it,  
22 but since a certain distance from that plume, it must  
23 meet regulatory requirements. It will. So, don't  
24 worry. And that's the extent of analysis.

25 They don't tell us amounts. They just

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 say it's a tautology. They say, we're going to meet  
3 all requirements, and so there won't be a problem.  
4 Micron should conduct a thorough risk assessment.  
5 I'm echoing here what Mr. Doody recently pointed out  
6 that we have no risk assess -- assessment in the  
7 D.E.I.S.

8 This plant is projected to operate for  
9 decades and one out of ten PFAS facilities has an  
10 incident. So, there's a ten percent chance of a  
11 major environmental incident. Not to have your  
12 environmental impact statement assess what would  
13 happen in a spill or an incident is a major  
14 oversight.

15 You're trucking PFAS in other  
16 chemicals into the Clay facility, as Mr. Doody  
17 pointed out, a spill could go to Young Creek Oneida,  
18 Oswego Rivers, Lake Ontario. Contamination of the  
19 Great Lakes is a violation of the Great Lakes Water  
20 Quality Agreement between the United States and  
21 Canada.

22 Releases of chemicals into Lake  
23 Ontario would be near the water intake. You should  
24 proactively support the water quality anti-  
25 degradation policy of NYSDEC and findings and

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 objectives of the Great Lakes St. River -- St.  
3 Lawrence River Basin Sustainable Water Resources  
4 agreement.

5 MR. DAVIS: Ten seconds.

6 MS. HAAS: The scale of the Micron's  
7 projected water usage and its potential consumptive  
8 use from the manufacturing operation should trigger  
9 an immediate review of OCWA's water withdrawal permit  
10 in light of --

11 MR. DAVIS: Thank you.

12 MS. HAAS: -- the requirements of the  
13 Great Lakes Compact.

14 [Applause]

15 MR. DAVIS: Thank you. I would  
16 encourage you to submit your written statement at the  
17 end. Thank you.

18 MS. HAAS: We will.

19 MR. DAVIS: Jump over here. Don.

20 MR. HUGES: Thank you. When is this  
21 hearing over?

22 MR. DAVIS: This hearing ends at one  
23 o'clock. This session ends at one o'clock.

24 MR. HUGHES: Okay. So as I understand  
25 it, it's eleven thirty now. We have ninety minutes

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 left. Why are we limiting the comments to three  
3 minutes?

4 MR. DAVIS: That's the quorum.

5 MR. HUGHES: Sorry?

6 MR. DAVIS: That is the quorum.

7 MR. HUGHES: That's the rule?

8 MR. DAVIS: I ask you to speak.

9 MR. HUGHES: All right. All right.

10 To continue on the issue of chemicals. So, the --  
11 the D.E.I.S. lists a total of about eighteen  
12 chemicals that are actually identified. The  
13 D.E.A.I.S. should identify all the chemicals that  
14 Micron is using.

15 As I mentioned before, fifty-five  
16 million gallons of chemicals will be stored on site.  
17 The federal government has certainly done a better  
18 job in this respect in their programmatic  
19 environmental impact statement for the semiconductor  
20 industry.

21 They list a whole table of two hundred  
22 hazardous processed chemicals. These things include  
23 hydrochloric acid, hydrogen fluoride, sulfuric acid,  
24 nitric acid, a lot of corrosive chemicals, peroxides,  
25 which are strong oxidants, silane, ammonia, nitrogen

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 trifluoride, sulfur hexafluoride.

3 Some of this stuff is highly, highly  
4 toxic. A chemical known as arsine, deadly. The  
5 community needs to know about this. D.E.I.S. to  
6 properly assess environmental impacts and that  
7 includes human health impacts needs to include  
8 information about how much of this stuff is going to  
9 be used.

10 How much is going to be transported  
11 through the community on Route 31 or however it gets  
12 there. I would -- the Micron has stated in the  
13 E.I.S. that they're going to transport all the  
14 chemicals by truck. I would recommend that they  
15 rethink that. Rail transport is much safer in  
16 general.

17 Let me talk a little bit about PFAS.  
18 PFAS are not explicitly identified in the document  
19 just like the other chemicals. They're mentioned but  
20 there are hundreds and hundreds of types of PFAS that  
21 are used in the semiconductor manufacturing process.

22 Again, federal government through its  
23 E.I.S., the programmatic environmental assessment,  
24 has ten pages listing PFAS, types of PFAS used in the  
25 semiconductor industry.

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2 MR. DAVIS: Ten seconds.

3 MR. HUGHES: And we need to see this  
4 level of detail in this document. You can't possibly  
5 do a proper environmental review without that kind of  
6 information it's going into the wastewater, it's  
7 going into the air.

8 [Applause]

9 MR. DAVIS: Thank you.

10 MR. PRZEPIORA: Thank you.

11 MR. DAVIS: State your name again.

12 MR. PRZEPIORA: Yes. My name is John  
13 Przepiora. I reside in the City of Syracuse. That's  
14 P-R-Z-E-P-I-O-R-A. The impact of developing an  
15 estimated twenty-seven thousand new household units  
16 is ill assessed in the D.E.I.S.

17 To rely on the hope that future  
18 policies will match the vision of the Onondaga County  
19 comprehensive plan for smart growth isn't sufficient.  
20 Real planning and commitments are necessary. And I  
21 see little of that detail in this D.E.I.S.

22 The carbon footprint of the induced  
23 residential and commercial development isn't  
24 estimated in the D.E.I.S., nor any mitigation  
25 specified or required. They should be. The

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 infrastructure expansion of -- for the induced  
3 residential and commercial growth isn't as estimated.

4 How many miles of new roads, water  
5 lines and sewers will be needed to serve twenty-seven  
6 thousand new households? How much land is needed to  
7 be developed? None of these are presented in the  
8 D.E.I.S.

9 Micron claims that the only  
10 alternative is -- to this project is to build four  
11 fabs. That fewer than four is uneconomical, robbing  
12 them of the needed rate of return to make the Clay  
13 New York project viable.

14 This is searched and isn't  
15 sufficiently supported by evidence, particularly when  
16 other fab projects elsewhere have created fewer fabs  
17 at one location.

18 If four fabs are required for the  
19 White Pine Park, the approval process should be  
20 modified to allow build and assess incremental --  
21 build and assessed -- I lost my place here --  
22 incremental phasing sequence to ensure that  
23 commitments made are kept before continuing to build  
24 out additional fabs.

25 Finally, Micron should be required to

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 fund mitigating measures to protect the region from  
3 adverse impacts. It is unclear that pilot payments,  
4 wages paid or rising real estate values will offset  
5 those adverse impacts.

6 Offsets against added municipal  
7 services, incentives to assure sufficient affordable,  
8 housing is available and payments to offset  
9 environmental degradation should all be on Micron and  
10 its shareholders, not current residents. Thank you  
11 very much.

12 MR. DAVIS: Thank you.

13 MR. DOODY: Thanks again. I'm Paul  
14 Doody, retired chemical environmental engineer living  
15 in Baldwinsville. I appreciate the opportunity to be  
16 able to throw a couple more comments out here that I  
17 intended to --

18 MR. DAVIS: No problem.

19 MR. DOODY: -- say in the first place.  
20 So, the first one is, I just want to reinforce my  
21 opinion that the comment period -- the forty-five-day  
22 review period is woefully insufficient.

23 Asking the public to digest twenty  
24 thousand pages of this report, which is five hundred  
25 pages a day of technically dense content in the

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 middle of the summer vacation season, I think is --  
3 is just wrong. We deserve more time and I don't see  
4 any reason why we shouldn't have more time to be able  
5 to review this and digest it properly.

6 Another comment I have is I'm  
7 concerned with the impact this is going to have on  
8 housing affordability. You know, many homeowners  
9 expect to -- like myself, expect to see home values  
10 rise with this development.

11 And the increase in housing and rental  
12 prices on the other hand are going to make housing  
13 even more unaffordable than it is today for many  
14 people in the region. Now, the report refers to a  
15 New York State initiative, but I question whether  
16 that will be enough.

17 This is an issue someone other than  
18 Micron needs to take ownership of and not just kick  
19 it to the state of New York. And my final comment is  
20 really more of a question.

21 In looking at the massive development  
22 that's going to go on here, are there an adequate  
23 number of qualified contractors and rail accessible  
24 aggregate availability to be able to handle all this  
25 construction under the schedules presented?

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2 I guess your engineers have probably  
3 looked at this, but I think that's a pretty serious  
4 concern. And what that would do is delay the  
5 project. So, I think everybody's anxious to get this  
6 project. Personally, I'm kind of in support of this.

7 I think long term it's a great  
8 project, but I want to see it done right. I was a  
9 spill control leader for the I.B.M. semiconductor  
10 facility in East Fishkill. I've seen what can go  
11 wrong. You can do everything you want to do, but  
12 accidents happen.

13 And I think you've not done a good  
14 enough job in this report to address spills and those  
15 consequences. And that's it. Thank you very much.

16 [Applause]

17 MR. DAVIS: There I see new  
18 people coming into the room at various times  
19 throughout this session. So, if there's anyone that  
20 would like to speak that has not filled out a comment  
21 card then I ask that you please come down, identify  
22 yourself in the microphone and have an opportunity to  
23 speak.

24 MS. BRIDGES: Hi, I'm Elizabeth  
25 Bridges, B-R-I-D-G-E-S. I live in Clay, just off of

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 Moyers Corners at Route 31 57. So, my question has  
3 to do with the HAZMAT response. HAZMAT in the  
4 D.E.I.S. they spoke about the Syracuse and Clay Fire  
5 Departments coordinating with the Micron HAZMAT.

6 This has to do with the increased  
7 population and size that would come with this. So,  
8 would that not mean that the fire departments would  
9 also have to increase their professionals so that  
10 they can handle the new population and if something  
11 happened on the highway or even in the facility that  
12 there's enough people to not only handle the Micron  
13 HAZMAT, but just the general population that would be  
14 in the area? That's -- that's just my question.

15 [Applause]

16 MR. DAVIS: Thank you.

17 MS. BRIDGES: Thank you.

18 MR. DAVIS: Any other speakers that  
19 have not spoken? Okay. I'm going to afford the  
20 speakers that were cut off. We had two speakers that  
21 I provided additional three minutes of time to  
22 before. So, if you would like to come down to those  
23 two speakers and provide some additional comments,  
24 you're welcome to.

25 Again, I'll ask you to keep it to

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2 three minutes because we do have people that are  
3 coming into the room and I want to make sure that  
4 everyone that here within their time period has an  
5 opportunity to speak and comment. State your name  
6 again, please.

7 MS. HAAS: It's Karen Haas from  
8 Sterling. So, I was talking about the water intake.  
9 Micron -- New York State Law as some of you probably  
10 know was updated to incorporate the Great Lakes  
11 Compact, which is compact between the United States  
12 and Canada, that addresses water withdrawal limits.

13 And so, you have to get a permit for  
14 any type of water withdrawal system that has a  
15 capacity to draw more than a hundred thousand dollar  
16 -- hundred thousand gallons a day. D.E.I.S. notes  
17 that forty-eight million gallons a day will be  
18 required at full build out.

19 And the project, of course, it's going  
20 -- Micron's water source will be Lake Ontario through  
21 the OCWA through the Lake Ontario water treatment  
22 plant. The water treatment plant currently has a  
23 practical sustained output of approximately fifty-  
24 four million gallons a day.

25 And it has a maximum capacity of sixty

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2 million gallons a day and a permitted waste with --  
3 permitted water withdrawal limit of up to sixty-two  
4 point five million gallons a day.

5 So, the current existing permit is  
6 going to accommodate the freshwater demand for the  
7 first two fabs. But you've chosen to make this the  
8 only public hearing for all four fabs that we'll ever  
9 have. And so, we're now -- you're going to approve  
10 the project to build the PFAS that are going to be  
11 built and completed sixteen years from now. It's the  
12 only comment period we're ever going to have. So, to  
13 accommodate the last two fabs, you're going to have  
14 to get a modification of that water withdrawal  
15 permit.

16 And so, since you've chosen to analyze  
17 the environmental impacts just this once in 2025 for  
18 the next sixteen years, you really ought to be  
19 investigating. You should be reviewing the existing  
20 water withdrawal -- withdrawal permit as you're  
21 required to do under the Great Lakes Compact, which  
22 is an international agreement with Canada.

23 MR. DAVIS: Thank you. Go ahead, Don.

24 MR. HUGHES: Okay. This is Don Hughes  
25 again. I want to just continue and finish up about

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 PFAS. It's a pretty wonky subject, but it's  
3 important that we address it. I want to read a  
4 couple things from my friend and colleague, Lenny  
5 Siegel, who is out in California and he's written  
6 some good comments. He will be submitting comments  
7 on Micron.

8 It's the high-level takeaway. Micron,  
9 like other semiconductor producers, has always  
10 utilized and released into the environment a wide  
11 range of hazardous substances. In fact, the industry  
12 introduces hazardous substances into wafer  
13 fabrication faster than researchers can determine  
14 their toxicity and government agencies can regulate  
15 them.

16 The Clay Environmental Review provides  
17 an opportunity to address potential semiconductor  
18 pollution in advance. In other words, let's build it  
19 right. Let's design it right. As Paul Doody has  
20 pointed out with spills, he want to design it right  
21 from the get-go. Continue with Lenny Siegel's  
22 comments.

23 Unfortunately, the Draft Environmental  
24 Impact Statement is vague, providing the public and  
25 relevant agencies insufficient information to

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2 determine if best -- best practices will be used to  
3 prevent human and environmental exposure to chemicals  
4 from the Micron factory. The technical term for this  
5 is kicking the can down the road.

6 So PFAS, we have -- we have a perfect  
7 storm here. We have this giant universe, thousands  
8 of types of PFAS. Toxicities vary, but we know that  
9 they -- many of these things are extremely toxic or  
10 very toxic. What's provided in the E.I.S. is vague,  
11 and the regulation of these compounds has not caught  
12 up to the reality that hundreds of these PFAS  
13 compounds are used in modern chips manufacturing.  
14 The regulations are focused on two compounds: PFOA  
15 and PFAS. The State of New York and E.P.A. have  
16 issued drinking water standards for those two  
17 compounds.

18 The fact is that these types of PFAS  
19 are no longer used by the chips industry, as noted by  
20 the CHIPS office in their environmental assessment.  
21 Long chain PFAS compounds, such as PFOS have been  
22 replaced by short chain PFAS. Another long chain  
23 PFAS, which is the PFOA, the octanoic acid, was  
24 phased out in the United States ten years ago and is  
25 expected to be eliminated globally this year.

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2 So, we're looking at the wrong things.  
3 The regulatory agencies are looking at the wrong set  
4 of compounds. Two compounds which the chips  
5 manufacturers don't use.

6 MR. DAVIS: Thank you. Thank you.  
7 State your name again, please.

8 MR. LANCETTE: Thank you. My name is  
9 Greg Lancette and I don't think I mentioned that I  
10 live in the Village of North Syracuse in the Town of  
11 Clay.

12 MR. DAVIS: Can you spell your last  
13 name for Greg so we can just make sure it's recorded.

14 MR. LANCETTE: Yes. My last name is  
15 L-A-N-C-E-T-T-E.

16 MR. DAVIS: Thank you.

17 MR. LANCETTE: I understand it's quite  
18 the hot topic here, and it's such a massive project  
19 that has been proposed to our community. And there  
20 is always a lot of anxiety, concern, excitement, all  
21 blended into one big hot ball of energy.

22 And you know, some of the concerns  
23 with the economic opportunities coming in all of that  
24 is that we don't want to get into splitting our  
25 community over all of the concerns that come into

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2 these conversations when it comes to the fact of many  
3 of the demographics of our county are older by age  
4 and demographic, and many have already worked and  
5 earned a career and have retired and still reside  
6 here. And that where it appears that sometimes the  
7 concerns are all very valid and they're all very good  
8 questions and comments that we are hearing at these  
9 hearing today and throughout today.

10 But closing the door on any type of  
11 prosperity to -- when we're talking about a parcel  
12 here that I have hunted on personally. I've had  
13 friends that actually moved off of Burnett Road and  
14 all of that. I mean, it's always been that and it  
15 has been an industrial park designated for over two  
16 decades.

17 And that -- and I understand  
18 everybody's concerns, but to have the end game or the  
19 desire to not only force an extraction of more and  
20 more information that we could go on for years with  
21 in an industry that is heavily regulated, and in a  
22 state that has some of the most stringent  
23 environmental review and regulations, air quality,  
24 water quality and all of that. We feel that, I feel  
25 that, these steps are necessary process, but I am

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2 also concerned of the continuous extension of the  
3 review product, the continuous bombardment with the  
4 industry attacking the industry itself to keep it out  
5 of our community when it's very similar to what goes  
6 on, whether it's energy policy or any of that.

7 It's paralysis by analysis in a  
8 community we could -- we're already the community  
9 that used to be and I don't want our community to  
10 turn into the community of what it could have been  
11 and what we are. Tremendous amount of upside, like I  
12 said earlier, generational employment opportunities  
13 that are sustainable. Thank you.

14 MR. DAVIS: Thank you. Any further  
15 speakers?

16 UNIDENTIFIED SPEAKER: Someone over  
17 here.

18 MR. DAVIS: Sure. Thank you. Please,  
19 come forward. State your name again, please.

20 MS. LAUZON: My name is Beth Lauzon,  
21 L-A-U-Z-O-N. And I totally agree. We don't want to,  
22 you know, get out of here Micron, we're not  
23 interested. But my whole life has been allied --  
24 nobody talks about this, allied chemical Solvay  
25 process. Onondaga Lake's been most polluted lake in

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2 the whole country.

3 I mean, do we have to start this over  
4 again? And yes, how do we get there? And yes, it  
5 was the 1800s, I get that. How do we get to that?  
6 We got there by people saying jobs, jobs, jobs, jobs,  
7 jobs. And that's wonderful. I would love to apply  
8 to Micron right now. They wouldn't hire me, but I  
9 would love to apply for them.

10 But can't we just bring in  
11 manufacturing industry and not freaking pollute our  
12 land for forty, fifty years? We had -- we can't even  
13 swim in Onondaga Lake still. I suppose we could, but  
14 nobody's going to swim in Onondaga Lake anymore.  
15 They go eat one or two fish maybe, possibly, because  
16 their mixing zone was the lake.

17 Mixing zone from Micron is going to be  
18 the Oneida River. If we don't look at it now, we  
19 will never look at it. And you know what's going to  
20 happen? Because this industry works so fast, in  
21 about ten years, they won't even be making the same  
22 chips. It will be different. The chemicals will be  
23 different, as they say. The chemicals are different  
24 now, but we're not looking at that because we're ten  
25 years behind.

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2 That's how we operate in New York  
3 State. That's how we get paralyzed, understood. We  
4 get paralyzed that way, but there's got to be a  
5 common ground. There's got to be a middle ground.  
6 Bring the industry in. Yes, our young people should  
7 have jobs. But yes, they shouldn't have to not swim  
8 in Lake Ontario, not swim in our Oneida Lake, not  
9 swim in Oneida River because we let them destroy it  
10 like we let them destroy Onondaga Lake. Don't do it  
11 again.

12 You're sitting right here, all these  
13 people, they have jobs, they have great jobs; you can  
14 do it. You don't need to slow it down to a crawl so  
15 Micron says, I'm out of here. Even that -- that may  
16 happen, but you don't need to do it.

17 You can do that. There's a middle  
18 ground we're saying, whatever you want Micron, you  
19 got it. And forget it, Micron. We'd like to  
20 maintain our rivers clean. There's a middle ground  
21 somewhere in there. They could -- and Micron can do  
22 it. Make them spend the money. That's all I need to  
23 say.

24 MR. DAVIS: Thank you. Any further  
25 speakers?

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2 MR. KOSKOWSKI: Hello. I'm Justin  
3 Koskowski, K-O-S-K-O-W-S-K-I. I live in Oswego, New  
4 York. I'm a representative for Local 669, Road  
5 Sprinkler Fitters. We're about sixteen thousand  
6 strong across the whole United States, about a  
7 thousand in New York.

8 This is a building that would be a  
9 great success for us, be a game changer for  
10 everybody, middle -- middle class and moving forward  
11 from elementary kids to kids graduating now, who have  
12 a career either in the trades or in the industrial  
13 moving forward. Thank you.

14 MR. DAVIS: Thank you. Any further  
15 comments? Okay. I'm going to take a five-minute  
16 break because I need to. And I mean, the comment  
17 period's open. We have people that likely could be  
18 showing up for lunchtime, so that's why we extended  
19 this period through a lunchtime break, so people  
20 could arrive.

21 So as new people come in, the hearing  
22 is not closed. It will not close until one o'clock,  
23 but to afford those people that may be coming at  
24 their lunchtime to speak. But I am going to take a  
25 five-minute break, so that I can run to the restroom.

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2 Thank you.

3 Giving a minute here for people to get  
4 settled, so that the speakers have their opportunity  
5 to speak.

6 (Off the record; 11:54 a.m.)

7 (On the record; 12:19 p.m.)

8 MR. DAVIS: Great. Thank you,  
9 everyone. I don't have to speak as loud. It's more  
10 echoing in here. The first to speak will be Steph  
11 Adams. Thanks, Steph. Three minutes. If you need  
12 more time after that, the -- Mary Thompson's going to  
13 speak next. And then if you need more time, you can  
14 come back.

15 MS. ADAMS: Okay. Thank you. My name  
16 is Steph. I live in Syracuse. I'm a historian. I  
17 work in a local history museum, but my comments today  
18 are entirely my own.

19 A number of times politicians have  
20 said Micron is our next Erie Canal moment. And while  
21 the canal did have a tremendous economic impact, that  
22 came at great cost and that the canal had severe  
23 negative environmental impacts, displaced native --  
24 native communities and was a workplace safety  
25 nightmare. I'm concerned that history is, in a way,

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2 repeating itself.

3 I'm worried about the forever  
4 chemicals, not just for myself and other residents,  
5 but for people working in the facility. In my  
6 opinion, the D.E.I.S. does not adequately outline  
7 workplace safety plans or systems of community  
8 oversight, and more importantly accountability.

9 The D.E.I.S. again and again feels  
10 like it's asking for our blind trust, but how can we  
11 trust when you give us only forty-five days to review  
12 a massive plan and one day to publicly comment, half  
13 an hour's drive away from the city no less? I want  
14 good, safe jobs for people already here in the  
15 facility, not just building the facility.

16 In vague promises of opportunity for  
17 the local community and historically marginalized  
18 groups do not necessarily translate to reality  
19 without good faith engagement as the makeup of  
20 today's meeting has shown. The vague notion of  
21 opportunity for a rubber stamp is not engagement nor  
22 is it justice.

23 From a past two hundred years,  
24 Syracuse and the surrounding area has seen  
25 infrastructure and massive industrial projects coming

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2 in benefiting few and then disrupting the many,  
3 disrupting the environmental area. And what point is  
4 there to studying and teaching and talking about  
5 history if we don't ever learn from it?

6 We have an opportunity to do this  
7 right from the start. So I encourage you to please  
8 do that, starting with extending the comment period  
9 and opening up more opportunities for people to  
10 publicly comment not just in one municipality. Thank  
11 you.

12 MR. DAVIS: Thank you. Next would be  
13 Mary Thompson.

14 MS. THOMPSON: Good morning, afternoon  
15 I'm not sure which it is. My name is Mary Thompson.  
16 I'm the C.E.O. of the Home Builders and Remodelers of  
17 Central New York. We're a regional trade  
18 organization with eight counties in the region, here  
19 to voice our strong support for the Micron project  
20 and for the conclusions presented in the draft  
21 environmental review.

22 Our members that develop land  
23 recognize the high standards in this review. Micron  
24 has demonstrated a strong commitment to mitigating  
25 environmental impacts by incorporating rigorous

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2 sustainability measures into its development plans.  
3 Their active engagement with local, state and federal  
4 environmental agencies have ensured compliance with  
5 regulations and transparency throughout the project.

6 By taking accountability for potential  
7 environmental effects and working proactively to  
8 address them, Micron is setting a high standard for  
9 responsible development in the region, and we thank  
10 them for that. This project represents more than  
11 just a major investment in our region's economy.  
12 It's a generational opportunity to build a stronger,  
13 more resilient community.

14 Micron's presence will bring thousands  
15 of high-quality jobs, spark innovation, and  
16 strengthen our local workforce. But most  
17 importantly, it underscores a pressing need that we  
18 can no longer afford to ignore: the urgent demand for  
19 more housing.

20 Micron's arrival highlight --  
21 highlights a critical need for more housing in our  
22 region. This project should be viewed as a catalyst  
23 for proactive, smart planning, encouraging state and  
24 local governments, developers and communities to work  
25 together on solutions that meet housing demands while

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2 preserving environmental quality.

3 As Micron and its supporting  
4 businesses bring in new workers and their families,  
5 our region must grow in a way that is inclusive,  
6 sustainable, and forward thinking. That means making  
7 housing a central part of this effort, not just for  
8 newcomers but for those of us that already live here.  
9 This is our chance to plan smart, to prioritize  
10 affordability, and to ensure we don't leave anyone  
11 behind.

12 Micron is not just building a factory;  
13 it is helping to build a future. The company's  
14 investment in education, training and partnerships  
15 with local schools and colleges will ensure that  
16 today's students are prepared for tomorrow's careers.  
17 This is an opportunity to keep our young people here  
18 in New York with good paying jobs, meaningful  
19 futures, and as productive citizens.

20 MR. DAVIS: Ten seconds.

21 MS. THOMPSON: The Micron project also  
22 offers a powerful reminder that progress doesn't have  
23 to happen in isolation. It takes community  
24 collaboration. Thank you.

25 MR. DAVIS: Thank you. Again,

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 there'll be an opportunity to speak again for  
3 additional three minutes. I do have another speaker  
4 that is registered. Bill Spreter.

5 MR. SPRETER: First of all, thank you  
6 very much for holding this hearing. I do appreciate  
7 it. I'm Bill Spreter. I'm the President of the  
8 Central New York Chapter of the New York State  
9 Alliance for Retired Americans. So, I want to say as  
10 a union member, as a person in the community, I  
11 welcome the fact that Micron's coming to our town.

12 I remember the time when we had real  
13 good manufacturing in this town. And I remember that  
14 it was unionized manufacturing that made this town  
15 and made the middle class. And I appreciate that.  
16 And I hope that is what Micron is aiming for in the  
17 future.

18 However, I do have concerns. We've  
19 heard from various environmental groups. We've heard  
20 from professors, some from E.S.F., we've heard from a  
21 Le Moyne professors. We've heard from workers  
22 groups. And we're concerned because Micron doesn't  
23 necessarily, in its past, have the same kinds of  
24 things that we anticipate in New York State, such as  
25 good paying labor jobs.

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2 We would like to have the jobs as  
3 middle-class jobs. Many of the jobs that will be in  
4 manufacturing may not be, in fact, middle class.  
5 We're concerned about that. We're concerned about  
6 workers' safety. I attend Workers Memorial every  
7 year. And a lot of people in New York State die as a  
8 result of being on the job. And these workers are  
9 going to be working with hazardous chemicals, PFAS,  
10 PFOS. And I -- I'm not one to tell you what they  
11 mean and how dangerous they can be, but I know that  
12 they can be dangerous after hearing presentations on  
13 them.

14 So, I'm just hoping that Micron does  
15 everything in its power to mitigate any effects on  
16 the workers, to make sure that the workers are really  
17 protected. It's not just the product that's  
18 protected, but that the workers are protected in a  
19 safe environment, that they can go home to their  
20 families.

21 So, these are some of our concerns.  
22 Our concerns also rise with the idea of wetlands. I  
23 remember where I lived in Baldwinsville, we had an  
24 awful lot of problems with water. Well, with all of  
25 this concrete being built, which is great, all of

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2 this being taken over, we have to have wetlands. And  
3 from what I've heard, if Micron could make a  
4 commitment that the wetlands would be greater than  
5 what they anticipate now to create, to take place --  
6 to take the place of the wetlands that now exist, we  
7 would really appreciate it.

8 Because all those people who are  
9 around them and the whole community will depend on  
10 the fact that there will be no flooding. And you  
11 know that's been in the news elsewhere. Som we're  
12 con -- concerned about the safety of the environment,  
13 concerned about the safety of the water, concerned  
14 about the safety of the employees and we want them to  
15 have good paying jobs.

16 And in that sense, I hope that Micron  
17 doesn't take the -- the kinds of things that other  
18 employers have done, like T.C.G. Player and other  
19 employers where they actively fight against the  
20 union, threaten the unions and threaten them to get  
21 out.

22 So please, Micron, make good on real  
23 commitments that you've heard here today with other  
24 speakers. Thank you very much. Appreciate it.

25 MR. DAVIS: Thank you. Anybody else

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 that hasn't spoken that would like to speak? Mary,  
3 would you like to come back up?

4 MS. THOMPSON: No.

5 MR. DAVIS: I hit -- I cut you out  
6 before. No?

7 MS. THOMPSON: That's okay.

8 MR. DAVIS: Okay. Thank you. Anybody  
9 else? Okay. This is a notice hearing that will end  
10 at one, so people again could arrive during their  
11 lunchtime to speak. So, it will remain open as I get  
12 more Coke, I might have one coming my way as we  
13 speak. Perfect. All right. Next speaker, Richard  
14 Wood. You hardly had time to settle into your seat.

15 MR. WOOD: Yeah, really.

16 MR. DAVIS: Yes.

17 MR. WOOD: Where do I --

18 MR. DAVIS: Microphone right here in  
19 front of you.

20 MR. WOOD: Oh, excellent.

21 MR. DAVIS: Yeah. You will have three  
22 minutes to speak. At the end of the three minutes, I  
23 will ask you if there is any other speakers. If  
24 there is an additional opportunity for you to speak,  
25 you will have an additional three minutes, okay?

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2 MR. WOOD: Thank you.

3 MR. DAVIS: Sure.

4 MR. WOOD: Sorry about that. I didn't  
5 get my --

6 MR. DAVIS: That's Okay. Your time  
7 hasn't started yet.

8 MR. WOOD: All right.

9 MR. DAVIS: You can stand at the mic  
10 and face up if that's -- so that the Stenographer can  
11 hear you.

12 MR. WOOD: Oh, Of course.

13 MR. DAVIS: Yes. Thank you.

14 MR. WOOD: Sorry about this. Okay.  
15 So, good afternoon. My name is Richard Wood. I'm a  
16 licensed professional engineer in New York State. I  
17 represent the Faith Impact Team of the Central  
18 Crossroads Conference of the Upstate New York Synod  
19 of the Evangelical Lutheran Church in America.

20 My comments today speak to the need  
21 throughout the life of the Micron facility. I'm  
22 terribly sorry about this. My comments speak to the  
23 need throughout the life of the Micron facility for a  
24 strong mutual good neighbor relationship with open  
25 two-way communication between the community and

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2 Micron.

3 To help maintain this relationship, we  
4 urge, that is our consultancy, the community  
5 engagement board be created to monitor and address  
6 the many facets of facility construction, operation  
7 and community impact that are identified in the  
8 D.E.I.S. as well as impacts that may well arise over  
9 facilities lifetime that are not identified.

10 The C.E.B., this Community Engagement  
11 Board, should be charged and empowered to monitor  
12 facility operation regulation and interaction with  
13 the community and to provide a strong open  
14 communication channel with Micron and the community,  
15 with and between Micron and the community.

16 The C.E.B. could be an expansion of  
17 the current community engagement committee which so  
18 far appropriately has addressed itself mainly to  
19 economic impacts and community benefits, or it could  
20 be a new body charged with monitoring facility  
21 operation and interaction with the community.

22 The role of the D.E.I.S. is to provide  
23 factual basis for deciding between facility options  
24 including the option of no facility based on present  
25 knowledge. Many impacts can be addressed at this

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2 stage only by reference to compliance with applicable  
3 regulations. The application of regulations and in  
4 some cases the regulations themselves cannot be  
5 specified clearly at this stage.

6           Impacts not foreseen in the D.E.I.S.  
7 may arise as well. Thus, many impacts will be fully  
8 understood only in the future when details of  
9 regulation, facility technology and facility  
10 operation are established and actual operations  
11 observed. Further, many changes in technology,  
12 environmental conditions, facility operation, and the  
13 surrounding community can be expected over the forty-  
14 year life of this facility.

15           Thus, community understanding of an  
16 engagement with facility impacts on the environment  
17 and the community must be an ongoing process  
18 sustained by the C.E.B. This process must be  
19 informed by detailed understanding of facility  
20 technology, construction, operation, impact  
21 monitoring and interaction with the environment and  
22 the community.

23           MR. DAVIS: Ten seconds.

24           MR. WOOD: Ten seconds?

25           MR. DAVIS: Ten seconds.

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2 MR. WOOD: Okay.

3 MR. DAVIS: You can have additional  
4 opportunity but --

5 MR. WOOD: Okay.

6 MR. DAVIS: -- finish up right now and  
7 -- and how about that --

8 MR. WOOD: Okay.

9 MR. DAVIS: -- you continue your chain  
10 -- your train of thought.

11 MR. WOOD: Yup. In closing, the  
12 Micron facility will bring many benefits and changes  
13 to Central New York. The Faith Impact Team wishes to  
14 welcome Micron as a neighbor both now and into the  
15 future. Micron will bring many opportunities for  
16 community interaction and growth.

17 To embrace these opportunities and the  
18 changes they will bring a good neighbor relationship  
19 with strong open communication is essential. This  
20 includes understanding the facility and its  
21 operations and impacts. We hope that Micron will  
22 engage the community in decisions affecting Central  
23 New York and our environment with openness and good  
24 faith.

25 We believe that a strong adequately

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 resourced Community Engagement Board is essential to  
3 create and maintain this relationship to benefit the  
4 entire community. The faith impact team looks  
5 forward to participating in this relationship. Thank  
6 you.

7 MR. DAVIS: Thank you. Any other  
8 speakers that would wish -- wish to speak? Okay.  
9 Please, come forward. Please, state your name and  
10 spell it for the Stenographer please.

11 MR. CAPLAN: Peter Caplan, C-A-P-L-A-  
12 N. I live in Baldwinsville. Not having had the  
13 opportunity to review the E.I.S., I wanted to, one,  
14 find out within that community fund that Micron is  
15 setting aside for various improvements, if there's  
16 any thoughts about supporting or underwriting some  
17 alternative energy for the Micron employees that are  
18 going to be buying homes, whether or not there is any  
19 provisions for solar or wind power to offset what  
20 Micron might be using and whether or not they would  
21 be investing in community energy programs throughout  
22 the region.

23 I was also interested, has there been  
24 any assessment on the -- the businesses that will  
25 come in as a result of Micron coming here? Have they

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 done an economic analysis? And again, I apologize  
3 for not having had the opportunity to read the E.I.S.  
4 But I'm just curious what the downstream economic  
5 impact beyond Micron is, if they are anticipating  
6 other businesses, industries that are planning on  
7 relocating in support of Micron or as a means of just  
8 providing additional services.

9 So, I wasn't sure if that was included  
10 or if there are some insights as to what other  
11 economic activities would be a result of Microns  
12 coming to town. And I appreciate the time. Thank  
13 you.

14 MR. DAVIS: Thank you. Any other  
15 speakers that would like to speak at this time?  
16 Okay. I will -- again, it's twelve thirty-seven.  
17 Well, come --

18 MR. WOOD: I have a couple of  
19 additional points.

20 MR. DAVIS: Please -- please stand  
21 back up. Yeah, you can make additional points at the  
22 microphone. Thank you.

23 MR. WOOD: All right. Okay. Just a  
24 couple of additional things in my statement. Some  
25 examples of facility impacts that should be addressed

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 by a Community Engagement Board process include,  
3 without limitation the following. Ground water  
4 impacts that may be observed during construction as  
5 identified by groundwater monitoring, impacts on  
6 wetland species habitats. So, we've certainly have  
7 done analysis, but until we actually observe what  
8 happens, there may be differences.

9 Advances in pollution control  
10 technologies such as management of P.F.A.S.,  
11 understanding that regulations require the use of  
12 best available technology. Advances in facility  
13 process technology and operating methods which are  
14 almost certain to come over the life of this facility  
15 and create perhaps important changes. So to fulfill  
16 this -- fulfill this role, the C.E.B. must have a  
17 close collaborative relationship with plant  
18 management and communication channels with the  
19 public, such as a website and public meetings.

20 It must have sufficient resources to  
21 implement its mission, including funding for  
22 technical and communication support. And that's the  
23 additional points that I was not able to get into my  
24 previous statement. So, thank you very much.

25 MR. DAVIS: Thank you. And for the

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 record, that was Richard Wood for the transcript.  
3 Thank you. Any further comments to be made? Okay.  
4 Please, come back to the mic. State your name again,  
5 please.

6 MR. SPRETER: Bill Spreter, New York  
7 State Alliance for Retired Americans. I have a  
8 further question or comment. I know in some  
9 industrial development agencies when a company comes  
10 in, they get tax breaks. It's frequently those tax  
11 breaks that run school taxes. And the schools here  
12 need the money to keep on going.

13 And it's, of course, from the property  
14 taxes a lot of it. Much many people don't like it,  
15 but if more of that money gives -- comes to a tax  
16 break to a facility coming into that area and  
17 deprives a school of needed money, then the rest of  
18 the taxpayers have to take up the burden.

19 So, I would hope under any facilities  
20 agreement that the schools in this area, the whole  
21 Central New York area, will not be adversely impacted  
22 by a lack of tax revenue as a result of some  
23 giveaways to a Micron. We love Micron. We'd like to  
24 see it come in. We'd like to see it thrive and  
25 people thrive with it, but that's part of the future.

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2 Another concern that I would have is  
3 that Micron wants to be a good neighbor. And I think  
4 that's what this gentleman was talking about. Micron  
5 needs to be a good neighbor and keep in communication  
6 with the people about all the other things that are  
7 going on with Micron and how it affects them.

8 And we know that we've had a neighbor  
9 before called Allied Chemical that created an awful  
10 lot of problems for us, for the future. And while  
11 we're an organization of retirees, we look to the  
12 future and we're concerned about what will happen to  
13 our kids and our grandkids if something gets out of  
14 hand in terms of the chemicals in the water or in the  
15 air.

16 And I know that through new  
17 technology, that probably can be mitigated. So we  
18 hope that Micron invests in that as well. Thank you.

19 MR. DAVIS: Thank you. Again, any  
20 further speakers?

21 MR. WOOD: Yeah, one more time.

22 MR. DAVIS: Sure. Yes.

23 MR. WOOD: I would just like to say  
24 thank you for being here and for providing this  
25 process. I think it's important. Appreciate the

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 opportunity. Thank you.

3 MR. DAVIS: And again, that was  
4 Richard Wood for the -- appreciate it. Further  
5 speakers, commenters at this time? We may have some  
6 more folks that arrive within the next nineteen  
7 minutes that wish to speak like Mr. Wood did. So,  
8 this remains open for the next nineteen minutes. You  
9 can all sit and -- and wait for that time period. It  
10 will not officially close until one o'clock. Thank  
11 you.

12 (Off the record; 12:42 p.m.)

13 (On the record; 12:59 p.m.)

14 MR. DAVIS: For anyone in the  
15 audience, if there's any more speakers that would  
16 like to speak in this morning public hearing session.  
17 Okay. Hearing none, I'm going to adjourn the hearing  
18 at this time for this morning session.

19 Any comments that the public would  
20 like to be included in the administrative record for  
21 this hearing need to be presented and submitted to  
22 our staff at this hearing. Please leave any prepared  
23 remarks with staff if you wish to leave your prepared  
24 remarks.

25 If you elected not to speak, you may

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 still submit written comments until August 11 to  
3 OCIDA and C.P.O. using the email and mailing address  
4 that have been posted on the screen behind me and are  
5 also available on both the OCIDA and C.P.O. websites.  
6 Written comments carry the same weight as comments  
7 given here today.

8 We appreciate having you turn out to  
9 make your comments. We respect all your comments.  
10 And you can be assured that they'll be given the  
11 appropriate consideration in our evaluation regarding  
12 the -- this proposal. Thank you very much. The  
13 hearing is now adjourned.

14 (Off the record; 01:00 p.m.)

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2 STATE OF NEW YORK

3 I, CARI RORABACK, do hereby certify that the  
4 foregoing was reported by me, in the cause, at the time  
5 and place, as stated in the caption hereto, at Page 1  
6 hereof; that the foregoing typewritten transcription,  
7 consisting of pages number 1 to 117, inclusive, is a true  
8 record prepared by Associated Reporters Int'l., Inc. from  
9 materials provided by me.

10 IN WITNESS WHEREOF, I have hereunto  
11 subscribed my name, this the 31st day of July, 2025.

12 *Cari Roraback*

13 CARI RORABACK, Reporter

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1 7/24/2025 - Micron Semiconductor Manufacturing Project

2 STATE OF NEW YORK

3 ONONDAGA COUNTY INDUSTRIAL DEVELOPMENT AGENCY

4 U.S. DEPARTMENT OF COMMERCE CHIPS PROGRAM OFFICE

5 U.S. ARMY CORPS OF ENGINEERS

6  
7 Public Hearing on NEPA-SEQRA Draft Environmental  
8 Impact Statement and Clean Water Act Section 404

9 Permit Application

10 Micron Semiconductor Manufacturing Project,  
11 Clay, New York

12 SESSION THREE

13 VIDEO RECORDED PUBLIC HEARING

14 DATE: July 24, 2025 at 6:00 p.m.

15 LOCATION: Liverpool High School

16 4338 Wetzels Road

17 Liverpool, New York 13090

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20 Reported by Cari Roraback

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1 7/24/2025 - Micron Semiconductor Manufacturing Project

2 APPEARANCES:

3 JEFF DAVIS ESQ., BARCLAY DAMAN counsel FOR OCIDA

4 ROBERT PETROVICH, EXECUTIVE DIRECTOR OF OCIDA

5 DAVID FRENKEL, DIRECTOR OF THE CHIPS PROGRAM

6 LT. COL. ROB BURNHAM, COMMANDER OF THE BUFFALO

7 DISTRICT, U.S. ARMY CORPS. OF ENGINEER

8 MARTY WARGO, CHIEF OF BUFFALO DISTRICT REGULATORY

9 BRANCH

10 CARLOS AGUIRRE, SPANISH INTERPRETER

11 MAGGIE RUSSELL, ASL INTERPRETER

12 ZENNA PRELI, ASL INTERPRETER

13 PUBLIC SPEAKERS:

14 ANDY MAGER

NICHOLAS GERNHARDT

15 CHRISTY DANNIBLE

GUY HART JR.

16 AUSTIN MILLER

JIM WHEELER

17 LAUREN KOCHIAN

ED STRONSKI

18 MELISSA LOPEZ

HILARY-ANNE COPPOLA

19 CHIP FIKE

RAYMOND YANG

20 MIKE GRECO

LOREEN PRINTUP

21 DARIN PRICE

FRANK FARNSWORTH

22 DAVID CASELAS

KRISTINA FITZSIMMONS

23 HUNTER SCHAROUN

EMMA KAPUTA

24 BARBARA HUNT

25

1 7/24/2025 - Micron Semiconductor Manufacturing Project

2 ROGER MERCIER  
3 ANTHONY LONGO  
4 FRED MILLER  
5 LORENZO TESORIERO  
6 NEIL WEBB  
7 DAVID KEYS  
8 GEORGE ROBBINS  
9 MOADE JAGUSAH

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1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 (The public hearing commenced at 6:00  
3 p.m.)

4 MR. PETROVICH: Good evening,  
5 everyone. Before we get started here, I want to make  
6 the audience aware that we have a Spanish-language  
7 interpretation, so, Carlos.

8 (Translator speaks)

9 Okay. Thank you. Good evening.  
10 Thank you for coming. Before we get started with  
11 this session, we did hear of a couple of housekeeping  
12 matters.

13 There are obviously illuminated exit  
14 signs at the back of this auditorium, and we also  
15 have restrooms around the corner from the exits as  
16 well, if those are needed. We also have, in case of  
17 emergency, law enforcement security personnel on site  
18 this evening.

19 We have, in addition, American Sign  
20 Language, and as we just heard, a Spanish-language  
21 interpreters available for anyone that needs -- in  
22 the audience that needs those services. And should  
23 they be required, please let us know at the front of  
24 the registration desk, and we will accommodate you in  
25 that regard.

1 7/24/2025 - Micron Semiconductor Manufacturing Project

2 My name is Robert Petrovich. I'm the  
3 Executive Director of the Onondaga County Industrial  
4 Development Agency, or OCIDA. I, along with OCIDA's  
5 legal counsel, Jeff Davis, will be moderating this  
6 public hearing this evening.

7 Seated with me at the table is David  
8 Frankel, who is the Director of the Environmental  
9 Division of the CHIPS Program Office, or C.P.O.,  
10 which is part of the U.S. Department of Commerce.  
11 Mr. Frankel will be making his brief opening --  
12 opening remarks shortly.

13 I would also like to introduce  
14 Lieutenant Colonel Robert Burnham, Commander of the  
15 Buffalo U.S. Army Corps of Engineers. Colonel  
16 Burnham will be making opening remarks as well in a  
17 few minutes. And also seated at the table is Martin  
18 Wargo, the Chief of the Buffalo District Regulatory  
19 Branch.

20 The purpose of this evening's hearing  
21 is to give members of the public an opportunity to  
22 provide verbal comments on Environmental Review of  
23 Micron's proposed Semiconductor Manufacturing Project  
24 and Connected Actions, which OCIDA and C.P.O. are  
25 jointly conducting under the New York State

1       7/24/2025 - Micron Semiconductor Manufacturing Project  
2       Environmental Quality Review Act, or SEQRA, and the  
3       National Environmental Policy Act, or NEPA, as well  
4       as to provide comments on the review of Micron's  
5       proposed impacts to the waters of the United States  
6       under Section 404 of the Clean Water Act, which is  
7       being conducted by the Army Corps of Engineers.

8                   OCIDA and C.P.O. released the Draft  
9       Environmental Impact Statement, or D.E.I.S., for the  
10      Micron project on June 25, 2025. The Army Corps of  
11      Engineers issued the Public Notice of Micron's permit  
12      application under Section 404 of the Clean Water Act  
13      on June 27, 2025.

14                   Information on how to provide written  
15      comments on either the Draft E.I.S. or the Section  
16      404 review is displayed on alternating slides on the  
17      stage -- on the screen on the stage. For -- most of  
18      you in attendance who are familiar with the proposed  
19      project. However, I would like to provide a brief  
20      review of what has occurred thus far in the  
21      environmental review process.

22                   On July 14, 2023, OCIDA received an  
23      Application for Financial Assistance from Micron New  
24      York Semiconductor Manufacturing, L.L.C.

25                   As most of you are aware, Micron

1       7/24/2025 - Micron Semiconductor Manufacturing Project  
2       intends to invest approximately one hundred billion  
3       dollars over the next twenty years to build a  
4       leading-edge semiconductor manufacturing campus in  
5       the Town of Clay, the expanded White Pine Commerce  
6       Park located at 5171 Route 31 in the Town of Clay,  
7       New York.

8                       The proposed project must be reviewed  
9       under SEQRA. In accordance with the requirements of  
10       SEQRA, on September 24, 2023, OCIDA declared itself  
11       as a leading agency for SEQRA -- for SEQRA purposes.  
12       OCIDA has issued a Positive Declaration due to the  
13       Proposed Project's potential to result in one or more  
14       significant adverse impacts and declared its intent  
15       to prepare a Draft Environmental Impact Statement.

16                      OCIDA then undertook the next step,  
17       which is scoping. Scoping is a process that develops  
18       a written document, the Scope, which outlines the  
19       topics and analyses of potential environmental  
20       impacts to be studied and addressed in the Draft  
21       E.I.S.

22                      Following public comment, OCIDA  
23       adopted the Final SEQRA Scope on December 14, 2023.  
24       The public was also previously given an opportunity  
25       to comment on the Scope for this project in March

1           7/24/2025 - Micron Semiconductor Manufacturing Project  
2           2024. Following the adoption of the Final SEQRA  
3           Scope, OCIDA engaged with C.P.O. and others to begin  
4           the process of preparing the Draft E.I.S., which  
5           evaluates the potential environmental effects of the  
6           proposed project.

7                               During development of the Draft  
8           E.I.S., OCIDA regularly consults with other SEQRA --  
9           SEQRA involved and interested agencies, including the  
10          New York State Department of Environmental  
11          Conservation and the New York State Department of  
12          Transportation, to ensure that all environmental  
13          impacts were identified and fully evaluated in the  
14          Draft E.I.S.

15                              On June 2025, OCIDA determined that  
16          the Draft E.I.S. was complete from commencement of  
17          the public review, pursuant to SEQRA, and opened the  
18          public comment period. The purpose of this evening's  
19          session is for the public hearing -- at this public  
20          hearing is to receive comments on the Draft E.I.S.,  
21          as well as for the Section 404 review, which Colonel  
22          Burnham will outline shortly.

23                              Please note, this is not a question-  
24          and-answer session. We will not respond or reply to  
25          comments expressed by the public during this hearing.

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 We will likewise not respond to any questions posed  
3 by the public during this hearing. Think I said that  
4 twice. OCIDA and C.P.O. will respond to all comments  
5 as part of the Final E.I.S.

6 This is an opportunity for the public  
7 to place their comments on the Draft E.I.S. and  
8 Section 404 review on the record. OCIDA encourages  
9 the public to participate in the process. This is  
10 your opportunity to have your voice heard. However,  
11 this hearing is not your only opportunity to submit  
12 comments on the E.I.S. -- Draft E.I.S. or the 404  
13 review.

14 If you do not wish to make a comment  
15 here this evening at the -- at this hearing, you may  
16 also submit your comments on the Draft E.I.S. or the  
17 404 review, which Colonel Burnham will address  
18 shortly, using the information displayed on the  
19 alternating slides in this room.

20 We have extra copies of notices on how  
21 to comment available for you if you wish to take a  
22 copy with you. The OCIDA notice and contact  
23 information for submitting comments can also be found  
24 on OCIDA's website. Public comments will be accepted  
25 through August 11 of 2021.

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 Your input both verbal comments  
3 received here tonight as well as written comments  
4 received by OCIDA and CPO will help C -- OCIDA and  
5 C.P.O. prepare a Final E.I.S., which will be released  
6 after all comments have been received and considered.  
7 It's important to note that equal weight will be  
8 given to both verbal and written comments.

9 There is a Court Reporter here who is  
10 making a record of all comments made. We ask those  
11 in attendance to please show respect for the person  
12 that is speaking, even if you do not agree with the  
13 comment. And also, please hold applause or other  
14 noise down so that we may make an accurate record of  
15 this proceeding.

16 At this juncture, I would like to turn  
17 the microphone over to David Frankel.

18 MR. FRANKEL: Good evening, ladies and  
19 gentlemen. As Bob mentioned, my name is David  
20 Frankel. I am the Director of the Environmental  
21 Division of the CHIP Program Office, or C.P.O., which  
22 is part of the U.S. Department of Commerce.

23 C.P.O. is the lead federal agency for  
24 the environmental review of this project under the  
25 National Environmental Policy Act, or NEPA, based on

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 C.P.O.'s role in providing direct funding to Micron  
3 for the proposed semiconductor manufacturing  
4 facility.

5 When a project requires both a federal  
6 and state environmental review, it is not uncommon  
7 for lead agencies at the federal and state level to  
8 work together to prepare a single comprehensive  
9 environmental document. C.P.O. has been working with  
10 OCIDA to prepare the Draft E.I.S. on that basis. The  
11 E.I.S. is a joint document under NEPA and SEQRA. My  
12 role today is to accept all comments as part of the  
13 NEPA process on behalf of C.P.O. and the U.S.  
14 Department of Commerce.

15 C.P.O. also encourages public  
16 participation in the process and welcomes all  
17 comments on the Draft E.I.S. We will give equal  
18 weight to verbal comments at today's hearing and  
19 written comments submitted to CPO or OCIDA by August  
20 11th. As Bob noted, after we close the public  
21 comment period, CPO and OCIDA will respond to all  
22 comments received when we prepare the Final E.I.S.

23 While C.P.O. and OCI -- OCIDA jointly  
24 prepared this E.I.S., because it is a comprehensive  
25 document that identifies potential environmental

1       7/24/2025 - Micron Semiconductor Manufacturing Project  
2       effects of the Micron project, it will also serve as  
3       a resource for other agencies conducting their own  
4       reviews of the Micron project in other connected  
5       actions to the project.

6                   On that note, I will now like to turn  
7       it over to Lieutenant Colonel Burnham for open  
8       remarks to the U.S. Army Corps of Engineers. Thank  
9       you for your attendance today at this public hearing,  
10      and we appreciate your participation in the process.

11                   MR. BURNHAM: Thank you, David. Good  
12      evening, ladies and gentlemen. Again, I'm Lieutenant  
13      Colonel Rob Burnham, Commander of the Buffalo  
14      District U.S. Army Corps of Engineers. I will be the  
15      presiding -- I will be the Presiding Officer for the  
16      Clean Water Act Section 404 aspect of this public  
17      hearing on behalf of the U.S. Army Corps of  
18      Engineers.

19                   Seated at the desk here with me to my  
20      right, your left, is Mr. Martin Wargo. He's the  
21      Chief of Buffalo District's regulatory branch.

22                   While the Department of Commerce is  
23      the lead federal agency on the E.I.S. for this  
24      project, the Corps of Engineers is a cooperating  
25      agency on the E.I.S. and we are here to specifically

1       7/24/2025 - Micron Semiconductor Manufacturing Project  
2       obtain information evidence and receive public  
3       comment to assist in the regulatory review of a  
4       permit application by Micron New York Semiconductor,  
5       as well as for two connected actions proposed by  
6       National Grid for a gas main and electric substation  
7       expansion.

8                       Because the Micron and National Grid  
9       projects proposed the placement of fill into  
10       federally regulated wetlands and streams,  
11       collectively referred to as the Waters of the United  
12       States, permits are required from the Corps of  
13       Engineers pursuant to Section 404 of the Clean Water  
14       Act.

15                      Department of the Army authorization  
16       is therefore required for the following. For the  
17       Micron Semiconductor Manufacturing Campus, the  
18       permanent loss of approximately one hundred and  
19       ninety-four acres of federally regulated wetlands and  
20       temporary impacts to an additional two point nine  
21       five acres, as well as the permanent loss of six  
22       thousand two hundred and eighty-three feet of  
23       federally regulated streams and ditches and temporary  
24       impacts to an additional one hundred and thirty feet.

25                      For the National Grid substation work,

1       7/24/2025 - Micron Semiconductor Manufacturing Project  
2       the permanent impact to approximately four acres of  
3       wetlands and one thousand five hundred and forty-five  
4       feet of regulated ditches, as well as temporary  
5       impacts to an additional eleven acres of wetlands and  
6       six hundred and eighty-three feet of streams.

7               And for the National Grid gas main  
8       work, the permanent impact to approximately point  
9       zero eight seven acres of wetlands, conversion of  
10      point zero three three acres of forested wetlands,  
11      and temporary impacts to approximately seven point  
12      four acres of wetlands and one hundred and seventy-  
13      five linear feet of streams.

14              The purpose of the proposed work is to  
15      -- to construct and operate a commercially viable and  
16      globally competitive advanced DRAM fabrication  
17      facility on a single unified site in New York State.

18              The Corps of Engineers is neither a  
19      component for, nor an opponent of, the proposed  
20      projects. Our role is to determine whether these  
21      proposed fill activities are contrary to the public  
22      interest or not. This hearing will play an important  
23      part in that determination.

24              This hearing will be conducted  
25      according to the procedures set forth in Title 33 of

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 the Code of Federal Regu -- Regulations Part 327.  
3 The public comment period for the Corps of Engineers  
4 Public Notice also closes on August 11, 2025. Hard  
5 copies to the Public Notice are available in the  
6 registration area.

7 Please note that there is a typo on  
8 some of the copies of the Public Notice indicating  
9 the comment period closes on August 18. The correct  
10 date is August 11. Details on how to comment on the  
11 proposed wetland and stream impacts may be found in  
12 the Public Notice as well as displayed on the screen  
13 in the front of the room.

14 The comments made here plus all  
15 submitted written information will become part of the  
16 Corps of Engineers Section 404 administrative record  
17 and will be used to evaluate the probable impacts,  
18 including the cumulative impacts, of the proposed  
19 activity on the public interest.

20 The ultimate decision on the submitted  
21 applications will reflect the national concern for  
22 both the protection and utilization of important  
23 resources. The Corps of Engineers permit decision  
24 will come after completion of the E.I.S. because we  
25 are also relying upon that for -- for purposes of

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 NEPA compliance.

3 Based on time limitations, if anyone  
4 desires an opportunity for rebuttal to any of the  
5 information presented at this hearing, we ask you to  
6 -- to please do so in writing and provide that to  
7 someone at the registration table and it will be --  
8 become part of the administrative record.

9 General comments may also be submitted  
10 until close of public comment period. Thank you and  
11 I look forward to hearing from your comments tonight.

12 MR. FRANKEL: Thank you, Colonel  
13 Burnham. I would now like to turn the administration  
14 of the public hearing over to OCIDA's Counsel, Jeff  
15 Davis, who will go through the process and how we  
16 will conduct the hearing and receive comments. So,  
17 Jeff?

18 MR. DAVIS: Thank you. Good evening.  
19 If you do wish to come forward and make a comment  
20 this evening, I'll ask that you please state your  
21 name and address and do so clearly and slowly so that  
22 the Reporter can make an accurate record.

23 Comments will be limited to three  
24 minutes to afford everyone who wishes to comment an  
25 opportunity to do so. There is no ceding of time to

1       7/24/2025 - Micron Semiconductor Manufacturing Project  
2       others. If there's time at the end of the session,  
3       speakers may return to the microphone and we -- and  
4       will be afforded an additional three-minute  
5       opportunity to speak.

6                If anyone has spoken at the early --  
7       this morning session or this afternoon session and  
8       you wish to speak again, we will take those comments  
9       after everyone in this session has had their first  
10      opportunity to speak. However, time permitting, our  
11      goal is to allow everyone who wishes to speak the  
12      opportunity to do so.

13               So, I'm going to call up the names.  
14      We have microphones at the front of each aisle, and  
15      I'll call names in order. I'll call the first and  
16      then the second speaker, so the person on deck, if  
17      you will, so that we can move through as quickly as  
18      possible, getting you -- so everyone has an  
19      opportunity to speak.

20               I just ask that you move to the front  
21      of the microphone quietly to not interfere with the  
22      current speaker. I also ask if you could please take  
23      your cell phones and turn them to mute or off so that  
24      no one is interrupted when they are speaking.

25               With that, our first speaker will be

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 Andy Mager, and our second speaker will be Nicholas  
3 Gernhardt. And I may have mispronounced that last  
4 name, but I think it's G-E-R-N-H-A-R-A-T.

5 MR. MAGER: Good evening. Thank you  
6 for the opportunity to speak here. My name is Andy  
7 Mager, M-A-G-E-R, address 559 Buckingham Avenue in  
8 Syracuse, 13210.

9 I'd like to start by recognizing that  
10 we gather tonight on the land of the Onondaga Nation,  
11 a sovereign indigenous nation who has inhabited this  
12 region and sought to teach us how to live  
13 harmoniously with all of the natural world. And I  
14 hope that all will keep that in mind as we move  
15 forward with considering this project.

16 I also want to respectfully say that I  
17 appreciate hearing the desire to hear public comments  
18 from a number of you. But if you really wanted the  
19 public to be able to comment thoughtfully on this,  
20 you would not hold one single public hearing. You  
21 would not limit the comment time to forty-five days.

22 Onondaga County held this report for  
23 three months. According to many sources that  
24 violated public notice laws, so that should have been  
25 available to the public. Those of you considering it

1       7/24/2025 - Micron Semiconductor Manufacturing Project  
2       for Onondaga County largely are paid professionals  
3       who do this on your work time. Those of us in the  
4       public are given half that time this -- when we're  
5       not professionals doing that, when we have our own  
6       jobs, our own families, our own lives.

7               So, I need to start by saying while  
8       I've followed this project for -- since discussion  
9       about it began, I've not had the time to review all  
10       the documents in -- in any -- by any means. But I  
11       bring a number of concerns.

12               And my overall perspective on this is  
13       that I ask that we move forward in a way that seeks  
14       to maximize the benefit for those who are already  
15       hurting in our community, those without jobs, those  
16       living in poverty, those who are marginalized in  
17       various ways.

18               And that we also seek to minimize the  
19       harms because a project of this scale is going to  
20       cause harm. It's going to use vast quantities of  
21       water and electricity of -- all of which are limited.

22               So, in terms of those environmental  
23       issues specifically, right? There's a massive energy  
24       demand for this project, right? I've heard it's the  
25       same amount of energy as consumed by the States of

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 Vermont and New Hampshire. New York State has a  
3 really important commitment to reducing our  
4 greenhouse gas emissions and increasing renewable  
5 energy. That needs to be considered as part of this.

6 I don't know exactly what's included  
7 in the plan, but I urge that it -- that Micron be  
8 mandated to have very significant investments in on-  
9 site renewable energy, wind energy, solar energy.  
10 And that this idea that --

11 MR. DAVIS: Ten seconds.

12 MR. MAGER: -- that nuclear power is  
13 renewable needs to be cast aside because it's not  
14 renewable. The last thing I'll say is that in  
15 projects like this, the way to protect communities is  
16 to have a community benefits agreement, so that  
17 there's a guarantee that what is projected to happen  
18 does happen. So, I hope that that will happen moving  
19 forward. Thank you.

20 MR. DAVIS: Thank you. Nicholas and  
21 then next will be Christy Dannible.

22 MR. GERNHARDT: Hi, my name is  
23 Nicholas Gernhardt, and my address is 460 Stafford  
24 Ave, Syracuse, New York, 13206. I just wanted to  
25 come tonight to speak in support of the Micron

1       7/24/2025 - Micron Semiconductor Manufacturing Project  
2       project and to share my gratitude with the  
3       opportunity for the community to comment on the  
4       project.

5                   I'm a lifelong member of Central New  
6       York. I do believe that Micron will have a positive  
7       impact on our community. And I -- I believe that the  
8       project supports strong labor practices, as well as  
9       workforce engagement and apprenticeships. It  
10      includes investments in education and skill  
11      development.

12                   I also believe the plan emphasizes  
13      meaningful, local and sustainable economic  
14      investment. I believe that overall, it promotes long  
15      term community growth. And I believe that having  
16      this project here is a good idea because I think New  
17      York State supports the strong environmental  
18      practices that from what I've seen Micron has shown.

19                   And I think if this project is held in  
20      a different area, that those standards might not be  
21      upheld the way they would here. So, I think that's  
22      important to note, and that's what I got. Thank you.

23                   MR. DAVIS: Thank you. Christy  
24      Dannible. And after that would be Guy Hart, Jr.

25                   MS. DANNIBLE: Hi, my name is Christy.

1       7/24/2025 - Micron Semiconductor Manufacturing Project  
2       Thank you for giving us this opportunity. And I have  
3       some things written down. I am actually opposed to  
4       having this plant here because of the environmental  
5       impact that it could possibly have.

6                   Some of the past Micron plants in  
7       Manassas, Virginia have already had pollution  
8       citations and stuff and health issues that have been  
9       coming up. Also, Micron is going to be generating a  
10      substantial amount of wastewater containing various  
11      chemicals, some potentially hazardous and designated  
12      as forever chemicals.

13                   What are the precise details of  
14      Micron's wastewater treatment processes in removing  
15      harmful substances before they discharge into the  
16      county sewage system? Also, what are the specific  
17      plans for the long-term management and disposal of  
18      hazardous waste generated by the plant, given that  
19      they could also be shipping to facilities across  
20      several states?

21                   What are the plans for robust,  
22      independent oversight and enforcement of  
23      environmental regulations to prevent accidents,  
24      leaks, or spills during chemical transport, storage,  
25      or usage?

1 7/24/2025 - Micron Semiconductor Manufacturing Project

2 Micron's operations are projected to  
3 emit nearly five million tons of carbon dioxide  
4 annually. That's equivalent to the emissions of  
5 about five hundred thousand cars, potentially  
6 jeopardizing the state's climate goals. What  
7 specific, independently verifiable measures will  
8 Micron implement to significantly reduce these  
9 emissions and ensure the project aligns with state  
10 and federal climate goals?

11 Also, Micron's construction are -- is  
12 going to impact the wetlands and potentially displace  
13 endangered species like the Indiana bat. What are  
14 the detailed and scientifically sound mitigation  
15 plans to address the loss of these wetlands and  
16 habitats and to project -- and to protect endangered  
17 species?

18 Will there be independent experts  
19 involved in evaluating and monitoring the  
20 effectiveness of mitigation measures, and will their  
21 findings be publicly accessible? It's also -- Micron  
22 is projected to create significant traffic  
23 congestion, particularly during the initial  
24 construction phase, what specific and immediate  
25 infrastructure upgrades are planned to mitigate

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 traffic impacts during construction --

3 MR. DAVIS: Ten seconds.

4 MS. DANNIBLE: -- in the long-term  
5 operation? Thank you.

6 MR. DAVIS: Thank you. Guy Hart Jr.,  
7 and then Austin Miller.

8 MR. HART: Good evening, Guy Hart Jr.,  
9 6 Broadhead Drive, Cicero. So, I'm a lifelong  
10 resident of Central New York. I lived on Oneida Lake  
11 most of that time. I moved in and out of town for  
12 university studies and chasing some things in the  
13 south, but in general, I've lived here.

14 And I remember Oneida Lake when it was  
15 brown because everybody's raw sewage went into the  
16 lake, on the whole lake. And I had an uncle who  
17 hasn't been here in twenty years and was out fishing  
18 with my dad yesterday, and he said, I couldn't  
19 believe we are in fifteen feet of water I could see  
20 all the way to the bottom.

21 And I informed him that Oneida Lake is  
22 now a pelagic lake, how much cleaner it is than it  
23 used to be. Thanks partly to invasive species from  
24 ships coming through the lake, but also mostly  
25 because of the state's program with sewage treatment

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 around the lake.

3 And that kind of example is what I  
4 look at when I see a company like Micron come into  
5 Syracuse. There are impacts that they will make, a  
6 couple hundred acres of wetland that are going to  
7 have to be mitigated. I would love to get that kind  
8 of treatment I know I never will, but all kidding  
9 aside, we need those chip fabs in this country. They  
10 are going to come to this country. They are going to  
11 have an environmental impact. There's going to be  
12 carbon footprint from those chip fabs coming to this  
13 country, whether it's in Texas or it's in Michigan or  
14 it's in Syracuse.

15 For too long, our region has seen a  
16 drain of our brain power, our population, and our  
17 resources to other places. And I think this is the  
18 opportunity for Syracuse to sort of be that shining  
19 city on a hill where we welcome something like this  
20 coming into our region. It works, and then there's  
21 more of it.

22 I'm amazed by how many people I talk  
23 to who go to places like Asheville, North Carolina,  
24 or they go to places like Charleston, South Carolina,  
25 or they move to somewhere like Boulder, Colorado, or

1       7/24/2025 - Micron Semiconductor Manufacturing Project  
2       Denver, because they want to get away from all the  
3       things here that they don't like.

4                   And those places have high traffic and  
5       carbon footprints that are ever growing because the  
6       population is growing, because they welcome growth.  
7       So, I'm hoping that that's what we end up with here.  
8       I think it's a sensible project, and I just wanted to  
9       make my -- my statement about it. Thank you.

10                   MR. DAVIS: Thank you. Austin Miller,  
11       and after Austin will be Jim Wheeler.

12                   MR. MILLER: Thank you, everyone. My  
13       name is Austin Miller, and I have lived on 5756 New  
14       Street for the past nineteen years of my life. Spent  
15       the majority of my childhood here. Now, first of  
16       all, I would like to thank you all for allowing this  
17       public speaking event to happen, even if it is only  
18       for one event, for only one day.

19                   Now, I would like to start this off  
20       with asking a rhetorical question to everyone that  
21       lives here. How many times have you been bitten by  
22       mosquitoes this summer? How many times have we  
23       needed to fog out our neighborhoods with chemicals,  
24       many of which haven't been tested with long-term  
25       effects on non-animal house pets or minor wildlife,

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 including insectoids, not in -- not including  
3 mosquitoes?

4 This will be our new reality we are  
5 heading to, I fear, if our natural -- if the natural  
6 habitat for bat populations around this area  
7 disappear. Bats that have already been in sharp  
8 decline around this area before Micron has started  
9 the project in this area.

10 The things that will be affected just  
11 from Micron opening the -- the buildings around these  
12 areas would be light pollution disturbing their  
13 flight paths, noise pollution driving them for  
14 roosts, polluted air and water conditions ruining  
15 their food supply, and because of the destruction of  
16 the forests, net -- they may not return to nests that  
17 they have to in the past.

18 It's not just bats; every bird, fox,  
19 amphibian, and pollinator will be impact -- impacted,  
20 especially the ones small enough to be silenced  
21 before they're even noticed. Many of these impacts  
22 will begin on day one if you guys opening Micron.

23 Now, I recognize Micron has pledged to  
24 restore wetlands and create new green spaces. I  
25 must, however, clarify that restoration is not

1       7/24/2025 - Micron Semiconductor Manufacturing Project  
2       preservation. Many restorations efforts, especially  
3       in large developments done by other companies, end up  
4       had -- being thin, shallow, limitations of the  
5       ecosystems they -- they have replaced. You cannot  
6       bulldoze an area that takes decades or centuries to  
7       form naturally and plant with freshly planted trees  
8       in a line pond and call it equal.

9                       Now, with billions of dollars sitting  
10       in the -- sitting in this, I understand very clearly  
11       like this much -- like this project must continue on  
12       for the local community. However, I think that  
13       things -- I ask Micron and every official here today  
14       to make a real commitment when it comes to both  
15       serving the community and serving the environment  
16       that is around said community. Commit to clear,  
17       legal-binding protections for remaining habitats.  
18       Commit to wildlife corridors and habitat  
19       connectivity, not just buffer zones. And commit to  
20       third-party monitoring of air, water, and noise  
21       pollution from day one of opening.

22                       Because if you truly want to be a part  
23       of this community, then you do start protecting what  
24       makes this place worthwhile. Thank you.

25                       MR. DAVIS: Thank you. Jim Wheeler,

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 and then Lauren Kochian.

3 MR. WHEELER: Hi, my name is Jim  
4 Wheeler, 9146 Mill Road. I've lived at that address  
5 for forty years. I have a brief operation. And my  
6 concern is that the -- I had a meeting at the Town of  
7 Clay, Army Corps of Engineers, and I asked the  
8 question to them as to what -- what's -- what's your  
9 answer to displacing all the wetlands? Where's the  
10 water going to go?

11 I know you're doing wetland mitigation  
12 twenty miles north. Water doesn't magically go from  
13 there up to the new wetlands. What's going to happen  
14 to all the extra water that's going to run through my  
15 property? And I'll probably end up with Lake Micron,  
16 I guess.

17 I asked the question before, and I was  
18 told I would get a response. To this date, I have  
19 not. That was like a year and a half ago or so. So,  
20 I guess that's my concern. Thank you.

21 MR. DAVIS: Thank You. Thank you,  
22 Lauren, and we have Ed Stronski.

23 MS. KOCHIAN: Hello, my name is Lauren  
24 Kochian. I'm the President of the Museum of Science  
25 and Technology in Downtown Syracuse. So, I want to

1       7/24/2025 - Micron Semiconductor Manufacturing Project  
2       speak about my experience with Micron having worked  
3       with them for about three years and working in the  
4       field of STEM Science Education for about a decade.

5               What I've enjoyed about working with  
6       Micron is we're very likeminded institutions.  
7       They're incredibly committed to STEM education in the  
8       communities in which they exist. And we really do  
9       live in a STEM region. Micron is not the only STEM  
10      institution in Central New York, but they will be  
11      obviously one of the largest.

12              My experience with Micron is it's not  
13      just that they bring incredible financial resources  
14      to STEM education, but they also bring a really great  
15      boots-on-the-ground grassroots commitment to STEM  
16      education. K through twelve too, so they really  
17      understand that the commitment to education starts at  
18      an early age.

19              So, working with places like the MOST,  
20      YMCA Boys and Girls Club, and with schools, because  
21      it really is this sort of holistic approach that gets  
22      kids ready for all of the jobs that, quite frankly,  
23      our kids are not ready for.

24              All of these jobs in Central New York,  
25      in STEM, and when I say STEM, I mean everything. The

1       7/24/2025 - Micron Semiconductor Manufacturing Project  
2       M is not just math, it's medicine and manufacturing.  
3       Our kids are not filling these jobs. A lot of these  
4       companies, the Lockheeds and all these companies are  
5       recruiting from other places. Companies like Micron  
6       specifically want the kids to come from our  
7       community, and that is really important.

8                   And -- and I think also Micron  
9       understands that if they help us prepare these kids  
10      for these types of jobs, and they don't actually work  
11      at Micron, even though these jobs are six-figure  
12      great jobs, and they do other things in our  
13      community, that's okay. They're still willing to  
14      make that investment for our kids.

15                   And I -- I think what's really  
16      important about that is I understand, as somebody who  
17      also cares about the environment, I understand the  
18      concerns about our environment, but let's face it,  
19      Chips are in everything everybody is holding in their  
20      hands today. Your phone, your computer, your video  
21      games, your car, your medical, everything that we  
22      use, chips are not going away. Those jobs are not  
23      going to go away. I don't think any of us are  
24      willing to give those up. So, the transformative  
25      effect that this can have on this community, I don't

1       7/24/2025 - Micron Semiconductor Manufacturing Project  
2       think we should give that up.

3                   And I certainly don't think that we  
4       should overlook the opportunity that Micron could  
5       bring specifically to some of the poorest kids in our  
6       entire country right here in Central New York, and I  
7       think that's a really important thing to consider  
8       when you're also considering the environmental  
9       impact. So, I thank you for your time today.

10                   MR. DAVIS: Thank you. We have Ed and  
11       then Melissa Lopez.

12                   MR. STRONSKI: Hello, Ed Stronski, S-  
13       T-R-O-N-S-K-I, and I'm from Liverpool, New York.  
14       It's my understanding that liquid helium is used for  
15       cooling in the production of microchips. While  
16       helium is an inert gas and not a dangerous  
17       environmental contaminant, the energy, fluids,  
18       materials used to sustain and employ it in liquid  
19       form could be in the scope of hazardous materials.

20                   I haven't had a chance to look at this  
21       in-depth because of the short timeframe between the  
22       release of the report, but my cursory review of the  
23       D.E.I.S. found no mention of helium.

24                   So, what the question boils down to  
25       is, are the helium systems included in the report and

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 just not identified as related to the helium, or is  
3 this an omission that requires being addressed in the  
4 Final E.I.S. report? Thank you.

5 MR. DAVIS: Thank you. Melissa Lopez.  
6 And after Melissa would be Hilary-Anne Coppola.

7 MS. LOPEZ: Good evening, everybody.  
8 My name is Melissa Lopez, and I grew up here in  
9 Syracuse, New York. I'm a member of Local 81  
10 plumbers, pipefitters, HVAC technicians, and welders,  
11 and I just wanted to make sure that everybody knew  
12 that this project has the potential of benefiting  
13 every tradesperson in our Central New York area.

14 A lot of our guys have to travel even  
15 out of state just to support their family. And this  
16 could mean that the next generations of workers don't  
17 have to go anywhere. They can stay right here where  
18 their kids are, where their loved ones are.

19 They don't have to spend six months,  
20 you know, in Washington or in Texas and -- and just,  
21 you know, miss everything. Their -- their kids'  
22 games, their, you know, the graduation ceremonies,  
23 like, you name it. Our guys and gals have missed  
24 important family moments because they could not stay  
25 home for work, and this is so huge that I feel like

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 it's very important.

3 Yes, I -- I agree the environmental  
4 concerns are very important to -- to address and to  
5 solve in the future. However, I also believe that  
6 this has the potential to benefit every single person  
7 in the Syracuse -- Central New York area, including,  
8 you know, educators.

9 Like, the amount of money, I -- I was  
10 going to -- going to say, that is going to come into  
11 our school districts is -- is -- is going to be so  
12 huge because people are going to be coming from  
13 everywhere. So, I just want you guys to con -- to  
14 consider that. Thank you.

15 MR. DAVIS: Thank you. Hillary-Anne  
16 Coppola, and after Hillary will be Chip Fike.

17 MS. COPPOLA: Good evening, all.  
18 Thank you. My name is Hillary-Anne Coppola. I live  
19 in the Town of Fayetteville. I was born in the City  
20 of Syracuse, and I've lived in Onondaga County my  
21 whole life. I'm a graduate of SUNY E.S.F. and a  
22 local community organizer working around  
23 environmental issues that affect the land and water  
24 where we live.

25 I first want to begin by reminding

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 everybody that you cannot drink money. I think it's  
3 wonderful that Micron is investing so much in our  
4 community, but the fact of the matter is that there  
5 is the potential for polluting the entire Great Lakes  
6 watershed.

7 PFAS, forever chemicals, as well as  
8 hundreds of other chemicals are used to wash the  
9 chips. It's part of the process, and there is a lack  
10 of regulation in that area. That is a gap in the  
11 D.E.I.S. that needs to be addressed.

12 Another gap in the D.E.I.S. is  
13 mitigating greenhouse gas emissions. Micron has said  
14 that they will purchase clean energy credits. Those  
15 energy credits do not exist in the State of New York.  
16 There simply are not enough. The energy resources  
17 that Micron will need are beyond what we have the  
18 capacity for. Therefore, Micron needs to also invest  
19 in renewable energy infrastructure such as  
20 geothermal, solar, and wind, as well as improving  
21 battery storage and grid infrastructure.

22 I mentioned the PFAS and the chemicals  
23 issues. We already have a highly polluted lake.  
24 Yes, restoration has been done, but that is a  
25 Superfund site that will need ongoing remediation,

1       7/24/2025 - Micron Semiconductor Manufacturing Project  
2       containment, and monitoring forever. That happened  
3       because of industrial pollution. We do not want that  
4       here again.

5                   Lastly, as folks probably know, this  
6       is the largest industrial development project in New  
7       York State history. It is the largest semiconductor  
8       facility plan in the U.S. to this point. Forty-five  
9       days is not enough. The document with its appendices  
10      are nearly twenty thousand pages long.

11                   It is not humanly possible to read  
12      that and get a good sense of what is being planned,  
13      what needs to be addressed, and submit that comment  
14      to the lead agencies. It is not enough. I am  
15      requesting hundred and twenty days for public  
16      comment.

17                   This was released during the summer.  
18      A lot of the public is very busy during the summer.  
19      A lot of the public may not be paying attention to  
20      comms where this information is going out and more  
21      time is needed in order for them to do that.

22                   In terms of the public interest that  
23      the Army Corps representative mentioned in terms of  
24      the wetlands, as a member of the public, my interest  
25      is in wetlands conservation, endangered species

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 conservation. We are in a mass extinction event.  
3 And mitigation and restoration for wetlands and  
4 habitats, roosting sites for the endangered bats  
5 needs to be done to the highest possible standard.  
6 Thank you very much.

7 MR. DAVIS: Thank you. Chip Fike and  
8 following Chip will be Raymond C. Yang.

9 MR. FIKE: Good evening. My name is  
10 Chip Fike. I live at 7567 Florian Way, Liverpool,  
11 New York. I've lived in this area -- excuse me, I've  
12 lived in this area since 1961. I've seen a lot of  
13 jobs leave. I want this to go through only because  
14 we need the jobs.

15 I respect everybody's views and  
16 comments, but if you go up to the Walmart in Central  
17 Square, there is a restored wetland to the left. I  
18 tell everybody this because they didn't get that  
19 Walmart built for almost ten years because of the  
20 comments and everything. They restored the wetland.  
21 It's not perfect. But after twenty years of being up  
22 there, the wildlife has come back, and it has gotten  
23 better over time.

24 The other thing I want to ask is we  
25 all know what's going on in the Pacific. We all know

1       7/24/2025 - Micron Semiconductor Manufacturing Project  
2       what's going on with Taiwan. We all know who the --  
3       who the country is next door. If they decide to go  
4       in there, that chipset has better -- better ramp it  
5       up quick because like one person said, we all have  
6       microchips in everything in our lives now.

7                   If that country goes into that  
8       country, because I was in the military for twenty-  
9       five years, I was on peacekeeping missions in the  
10      Sinai, if that country goes in there, they're going  
11      to control ninety-five percent of the microchips in  
12      the United States -- or not in the United States, but  
13      in the world, excuse me.

14                   The Chips Are For America Act, as far  
15      as I'm concerned, it needs to ramp up very, very  
16      quickly. I understand the political applications.  
17      We have to have these talks and everything, but I  
18      think for me and for everybody else, this is -- this  
19      has to go real quick.

20                   Another thing I want to bring up real  
21      quick, who is going to pay for the twenty-seven-mile  
22      water pipeline from Lake Ontario? Okay. I did some  
23      research two years ago. Somebody said it was six  
24      hundred million dollars. I guarantee you it's  
25      probably over a billion dollars. And I guarantee you

1       7/24/2025 - Micron Semiconductor Manufacturing Project  
2       it's probably going to be on us to pay for that.  
3       Micron's putting in hundred billion dollars. Could  
4       they pay for it? I mean, it would be nice if they  
5       could.

6                               And the only other thing is, has  
7       Micron or the State of New York talked to Onondaga  
8       County about the road infrastructure and everything?  
9       You see it going on in Cicero. It's a nightmare  
10      getting home. And it's a nightmare down near  
11      Brighton Ave. But I'm wondering if they're going to,  
12      you know, expand 31 all the way through Cicero.

13                              MR. DAVIS: Ten seconds.

14                              MR. FIKE: Okay, thank you. But  
15      that's all I have to say. Thank you very much.

16                              MR. DAVIS: Thank you. Raymond Yang -  
17      - Yang, excuse me. And after Raymond is Mike Greco.

18                              MR. YANG: Good evening, everyone. My  
19      name is Raymond Yang. I just purchased a property in  
20      Clay, zip code is 13041. And I'm originally from  
21      Taiwan. I spent the past twelve years in Downstate  
22      New York City, Queens.

23                              I had a good opportunity to learn all  
24      the projects because last year I went to be the  
25      interpreter for Mayor Ben Walsh and the executive

1           7/24/2025 - Micron Semiconductor Manufacturing Project  
2           Ryan Mahone, with a Taiwan Chiayi City Mayor, Mayor  
3           Huang. So, I'm very excited to know all the  
4           information.

5                               I'm so happy for all the community  
6           here because everyone is going to be very good  
7           because, you know, like the gentleman just mentioned  
8           that ninety-five percent of the chips are from  
9           Taiwan. And now the tension is, you know, with China  
10          is very significant right now.

11                              I do believe that we might need to  
12          rush, but I don't want to -- want people here to be  
13          the victims for all the, like, rough decisions. Like  
14          for the hearings, I believe we only have one hearing,  
15          and I think we should do more and do more research  
16          for that.

17                              My only question is, if everything is  
18          good, perfect, the worst-case scenario, something bad  
19          happens. Let's say there's bad traffic, air  
20          pollution, water pollution. Who is responsible for  
21          that, and how do we fix all the problems? Thank you.

22                              MR. DAVIS: Thank you. Mike Greco,  
23          and then Loreen Printup. Am I pronouncing that  
24          correctly?

25                              MR. GRECO: Good evening, everybody.

1       7/24/2025 - Micron Semiconductor Manufacturing Project  
2       It's been so far a very enlightening, this hearing  
3       today, of all the problems that this plant can exists  
4       to have. I live in 8204 Justin Drive here in Clay,  
5       Country Meadows. I love the area. It's very nice,  
6       and the community is great.

7                   Now that Micron's coming in about a  
8       mile down the road, we've had some problems in our  
9       community area with 481 exit ramps coming through  
10      Country Meadows. We've had -- we've had a traffic  
11      light put up there to save on accidents.

12                   But as a construction concern starts  
13      in November, I don't see anything from the state  
14      developing any new roads to conduct all the traffic  
15      for the trucks and diesels going down -- oh, probably  
16      right off of 41 Down Caughdenoy Road. That road  
17      cannot handle the traffic. We're not building  
18      anything. The state's not moving -- putting a new  
19      exit in. The construction's going to start in  
20      November, and the people of Country Meadows, which is  
21      right down the street from it is concerned.

22                   I think the delay in construction  
23      should start -- start past November into December,  
24      maybe January, until new roads can be built to  
25      facilitate the proper traffic from the plant.

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 Because right now, if you -- the traffic concerns now  
3 in 31 are terrible.

4 I mean, the Route 481 Exit should be  
5 built to allow truck traffic to -- to go to the plant  
6 without affecting residential areas. And it's our  
7 major concern for our development. But I'm excited  
8 about the project, but I'm not happy about the road  
9 construction problems that we have in the area.  
10 Thank you.

11 MR. DAVIS: Thank you. Is there a --  
12 I think it's Loreen Printup.

13 MS. PRINTUP: Greetings. Nyawenha  
14 Sgenon (native language). I am -- I live in Tully,  
15 5439. I was born and raised here. I'm a member of  
16 the Tuscarora Nation, part of the Haudenosaunee. I'm  
17 here to speak for the wetlands. I'm here to speak  
18 for the fish, for the birds, for the grasses, for  
19 they are my brothers and my sisters. They do not  
20 have a voice. That's my responsibility to caretake  
21 and to protect them.

22 I'm not very familiar with this  
23 process. This is all new to me. I have lived in  
24 harmony with the land since I was born and so has my  
25 ancestors. I want to express that we need to open

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 our hearts to our land and our surroundings,  
3 especially our waters, to not take that for granted.

4 This man here mentioned what will  
5 happen if there's an accident. This lady mentioned  
6 the danger of the Great Lakes. It's easy for you to  
7 say it's going to be fine. There's no guarantees for  
8 that. I'm also here to speak for my grandkids and  
9 their kids.

10 Who in here is thinking about the  
11 young ones that are being born, what they'll have to  
12 deal with? Can you honestly say it's going to be  
13 perfect? Honestly. I'm here to be honest, and I  
14 expect that from you. I didn't expect to speak, but  
15 I've kept my voice quiet all my life.

16 So now I speak for the Earth. And I  
17 have one word to say. You might not all know this  
18 word and what it means, but I -- I suggest you look  
19 it up, Cobalt Red. Children are being made to work  
20 for pennies a day for a chip.

21 MR. DAVIS: Ten seconds.

22 MS. PRINTUP: Thank you.

23 MR. DAVIS: Thank you. Next is a name  
24 I cannot read, but I think I can read the last name,  
25 and it is Price, P-R-I-C-E. Is it Darin? Thank you.

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2 Sorry, I just couldn't read the handwriting. After  
3 Darin will be Frank Farnsworth.

4 MR. PRICE: Good evening. I'd like to  
5 say that I'm -- well, first of all, I'm a Cicero  
6 resident for over thirty years, and I'm in full  
7 support of this project. It is time that we have the  
8 opportunity, our children have the opportunity, and  
9 families, our children can stay at home. They can  
10 stay at home and have real, livable wage, good jobs  
11 in our community.

12 I've heard people speak, and you know,  
13 I feel, you know, what they're talking about and I  
14 understand what they're talking about, but now I  
15 think it's time with this investment that Mike Brown  
16 is putting and what the New York State is putting  
17 forth, this is going to be a great opportunity moving  
18 forward for our families and to have a strong  
19 community right here in Cicero, Central New York.  
20 And I'd just like to say I fully support this  
21 project. Thank you.

22 MR. DAVIS: Thank you. Frank  
23 Farnsworth, and after Frank will be David Caselas.

24 MR. FARNSWORTH: Good evening. My  
25 name is Frank Farnsworth, and I reside in Syracuse.

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2       Aside from my time in college at the Rochester  
3       Institute of Technology, I've spent my entire life,  
4       thirty-seven years, here in Onondaga County. Grew up  
5       in North Syracuse, lived in Liverpool, Brewerton,  
6       Cicero.

7                       For the past eleven years, I've made  
8       my home in the City of Syracuse. For over thirteen  
9       years, I've worked in Enterprise computer design and  
10      manufacturing, designing the very types of hardware  
11      that Micron's product will ultimately power.

12                      For twelve of those years, I worked at  
13      a private, family-owned company here in Central New  
14      York, doing that work at a relatively impressive  
15      scale. But after we were brought -- bought out by a  
16      large out-of-state corporation, the facility was  
17      eventually shut down and over one hundred and fifty  
18      jobs were lost.

19                      I now work for a remote -- remotely  
20      for a tech company based in Nevada. Not necessarily  
21      because I wanted to work for an out-of-state company,  
22      but because the opportunities in my field are  
23      relatively limited, if not non-existent.

24                      I love this area. My family loves  
25      this area. We want to stay here. But simply put, we

1       7/24/2025 - Micron Semiconductor Manufacturing Project  
2       absolutely need companies like Micron to make that  
3       possible. And that's why I'm here speaking in  
4       support of the Micron project today.

5                   This facility isn't just about making  
6       microchips. It's about restoring a future for those  
7       of us who want to live, work, and raise families  
8       right here in Central New York. A future where  
9       talented people don't have to leave to just make a  
10      living.

11                   I've heard the concerns raised here  
12      today. I was watching it on Facebook live earlier,  
13      listening here tonight, and I truly do respect them.  
14      But we need to look at the full picture. Micron has  
15      a global track record of environmentally responsible  
16      fabrication, including ISO 14001 certified  
17      facilities, dangerous long-chain PFAS eliminations,  
18      and water reclamation systems.

19                   This isn't just a build now, ask  
20      questions later. The state and federal government  
21      will be watching closely and enforcing every step.  
22      It's not a free pass. It's a partnership.

23                   Ultimately, the greater Syracuse area  
24      has a real and likely once-in-a-lifetime chance to  
25      lead, not just in job creation, but in building

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2       something responsibly in the open, with local voices,  
3       and for the next generation. Let's not let fear stop  
4       us from building something extraordinary. Let's do  
5       this together the right way. Thank you.

6                   MR. DAVIS: Thank you. David, and  
7       then Kristina Fitzsimmons.

8                   MR. CASELAS: Good evening. My name  
9       is David Caselas. I live in Geddes Street, Syracuse,  
10      New York, zip code 13204. I'm here representing the  
11      Latino community, specifically the Mexican community.  
12      Understand that there's a million Mexicans living in  
13      this state. So, I'm representing the Mexican  
14      community and the Latino community.

15                   So, my question is, why haven't you  
16      given us this material in Spanish? We want the  
17      material in Spanish. We want a report of the process  
18      and disposal of the -- the water that you're going to  
19      be contaminating. We want it in Spanish.

20                   And we do not need your jobs. We do  
21      not need your jobs. We need a clean environment. We  
22      reject contamination of the lakes. We reject the  
23      lies of -- of capitalism. We demand respect for the  
24      Latino community. We demand respect for the Mexican  
25      community. One million Mexicans living in this

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 state. Thank you.

3 MR. DAVIS: Thank you. Kristina  
4 Fitzsimmons.

5 MS. FITZSIMMONS: Hello. My name is  
6 Kristina. I grew up here. I moved away due to lack  
7 of opportunity. I moved down to Jupiter, Florida,  
8 West Palm Beach, hotbed of engineers. I came home  
9 recently to realize we do have a hotbed of engineers  
10 here. We have so much talent here from music, so  
11 Micron's lucky to be having us.

12 My high hopes are that we get the most  
13 amount of innovation from the company. We get the  
14 best water filtration tech for our water. I'm also  
15 concerned about our wildlife. I love the idea of  
16 wildlife corridors. I love the idea that we could be  
17 the shining city on the hill.

18 The spirit of Syracuse is strong, and  
19 I think Micron will find a very nice home here. It  
20 isn't a matter of national security that we have  
21 these chips. We are in a war for compute with A.I.  
22 coming around, and I would love for this city to  
23 become a stronghold for all of our children.

24 I love our waters. I love Oneida  
25 Lake. I grew up around here, and I believe that we

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2       can find the compromise if we all work together. I  
3       don't think that we could -- that we should -- if we  
4       mess up, you know, ten acres of wetland, who's to say  
5       we can't put in, you know, five hundred more acres of  
6       wetland? Micron has a good budget for  
7       sustainability, guys, just so you know.

8                       So, we really can -- we can -- I see a  
9       vision where we could make this lot in this area even  
10      more beautiful with that budget and have this be  
11      Micron's shining example of sustainability. So, I am  
12      -- I am -- I am excited for this, and I am hopeful,  
13      and I feel very fortunate. So, thank you.

14                     MR. DAVIS: Thank you. Those are all  
15      the speakers that filled out a comment card at the  
16      beginning of this evening's session. So, I will open  
17      it up now for anyone that wishes to speak that did  
18      not fill out a comment card to please, if you would  
19      like to, acknowledge yourself. I'll have you come  
20      down.

21                     Since you don't have a -- a name  
22      written, I'll ask you to state your name and spell it  
23      for the Court Reporter. But I'll open up this  
24      opportunity for anyone that has not spoken that would  
25      like to speak.

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2 MR. SCHAROUN: Yes. My name is -- oh,  
3 sorry. My name is Hunter Scharoun. Hunter, S-C-H-A-  
4 R-O-U-N. I live in Liverpool, New York. I feel like  
5 when we come with big projects like this, they say,  
6 like, on paper it works. But I feel like we focus  
7 more on if we can do it and whether or not we should  
8 do it.

9 These environmental concerns are  
10 scary, to say the least. And I feel like with the  
11 rejection of a hundred twenty days for public  
12 comment, that it feels like we are just trying to  
13 push this project along as fast as possible, while  
14 also a little bit disregarding the opinions of the  
15 public with their only being one hearing, because  
16 people are busy. They sometimes can't make it on  
17 this one day.

18 Also, the concerns brought up that  
19 these documents are not translated into Spanish, it  
20 feels like this project is being pushed along just as  
21 fast as possible and were trying to -- they're trying  
22 brush us off.

23 I feel like -- especially with -- at a  
24 town hall meeting this Monday, there was a wide  
25 rejection towards the building of a McDonald's on

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2 Taft Road. And I feel like the public, we don't want  
3 to be -- we don't want to urbanize for multi-billion-  
4 dollar corporations to come in here, when I feel like  
5 money could be better invested into the community to  
6 help the average person, like, succeed, rather than  
7 giving contracts to multi-billion-dollar  
8 corporations. Thank you.

9 MR. DAVIS: Thank you. Any further  
10 speakers?

11 MR. PRZEPIORA: Hello, my name is John  
12 Przepiora, P-R-Z-E-P-I-O-R-A. I reside in the City  
13 of Syracuse. Born here, lifelong resident. Became a  
14 professional engineer after going away to college,  
15 studied regional planning at the Maxwell School  
16 before becoming city engineer in Syracuse and  
17 Commissioner of water.

18 But my concerns about this project are  
19 -- are many, but what I don't hear a lot talked about  
20 is the -- the induced growth that the project will --  
21 will spur. The estimates in the D.I.S. is for sixty-  
22 four thousand population, twenty-seven thousand new  
23 households.

24 That -- the number of households that  
25 were -- are estimated to happen in Onondaga County,

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2 you know, equal to about forty percent of the  
3 existing number of households in the City of  
4 Syracuse. So, this is not a small impact that's  
5 going to be spurred by the Micron in migration.

6 The Section 3.15.32 is -- covers a lot  
7 of these growth inducing impacts, but it's very  
8 confusing to -- to understand. And I think the --  
9 the potential for adverse impacts of this is not well  
10 thought through. People have talked about how this  
11 project is being rushed. The tran -- the  
12 transportation issues are -- are lagging be -- you  
13 know, lagging behind. But I think that the growth of  
14 the community hasn't been thought through in a -- in  
15 -- in an important way.

16 In the cumulative impact section,  
17 Table 4.2.1, it talks about that there's maybe fifty-  
18 eight hundred housing units are -- are in the  
19 pipeline right now. But that's way short of the  
20 twenty-seven household units that are -- that are  
21 projected to be necessary.

22 The growth inducing effects section  
23 poorly explains how -- how that -- how that growth  
24 will be met. It praises in the abstract the benefits  
25 of -- of -- of -- or you know, resulting from the --

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2       the fab development, the rising home values, but  
3       minimizes the adverse impacts which will likely arise  
4       without adequate preparation, infusion of funding,  
5       and citizen oversight and engagement, which has been  
6       grossly lacking with this project to date.

7               So, my suggestion is, and I will  
8       submit my detailed comments in -- in writing, but the  
9       whole section on growth inducing effects needs to be  
10      looked at carefully. It talks about the fact that --

11             MR. DAVIS: Ten seconds.

12             MR. PRZEPIORA: -- comprehensive plans  
13      need to be updated. We -- we are not ready for that  
14      migration that this project is going to promote.  
15      Thank you very much.

16             MR. DAVIS: Thank you. Any further  
17      speakers that have not spoken yet that would like to?

18             MS. KAPUTA: Hi, my name is Emma  
19      Kaputa, that's K-A-P-U-T-A. I live at 114 Redfield  
20      Place in Syracuse. Obviously, this is a huge  
21      project. With it is going to come a potential for a  
22      lot of growth for our community economically.  
23      There's also a lot of risks that we haven't talked  
24      about. So just the things our community is going to  
25      have to endure, like the traffic concerns, you know,

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2 tax increases as property values rise in the area.

3 I'm wondering, these high paying jobs  
4 that are coming into the area, are there any, you  
5 know, movements to make sure that those jobs are  
6 going towards revitalizing our local economy rather  
7 than promoting, you know, transplants?

8 I'm, you know, for our community  
9 that's going to be under these strains, I think it's  
10 important that those jobs revitalize our area rather  
11 than bringing in outside talent. We have a lot of  
12 very smart people in this area. And I just think  
13 it's important that we work together as a local  
14 entity to make sure that our people get these jobs,  
15 since we're the people dealing with these  
16 consequences. So, thank you.

17 MR. DAVIS: Thank you. Any other  
18 folks that would like to speak that have not spoken  
19 yet? Yes, please. Please state your name and where  
20 you're from.

21 MS. HUNT: Hi, my name is Barbara  
22 Hunt. I'm from Baldwinsville, New York. And I'm --  
23 I am a little upset that this environmental impact  
24 statement has only -- it's only taking place today.  
25 And I don't feel that there's enough time to really

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2 prepare to be able to, like, read through everything  
3 to be able to study all of the papers to give it the  
4 full understanding.

5 And I also feel, along with other  
6 people, that this is being rushed. I'm not saying  
7 that there aren't good aspects to bringing Micron  
8 here, but the environment is where a lot of people  
9 are getting disconnected from. We rely on the  
10 environment for our health. The organisms are  
11 connected to us, and a lot of people don't understand  
12 that big picture.

13 And you know, there's been some talk  
14 about some of the things that Micron is doing to help  
15 alleviate some of the environmental impact, but I  
16 don't feel that enough care has been in that.

17 And one of the questions that I have  
18 is if they are purposely working to help some of the  
19 endangered animals, like the harrier and the Indiana  
20 bat and some of the other organisms, are they  
21 bringing in biologists that have had success with  
22 those organisms? Are they making sure that they're  
23 building a team that is going to be -- have the --  
24 have a lot of experience to be able to help those  
25 organisms?

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2 And there are so many more organisms  
3 that are not being addressed, like the pollinators.  
4 Pollinators are really important, and we're  
5 decreasing the amount of pollinators just on a  
6 regular basis. And then to clear, you know, over  
7 five hundred acres is going to decrease that even  
8 more, and there's a lot of negative impacts regard --  
9 because of that.

10 And I just don't feel that the public  
11 really understands the connection. Organisms, clean  
12 water, it's all stuff that we rely on. People are  
13 too accustomed to entering Wegmans and buying what  
14 they need and then going back home, and they're  
15 missing that connection.

16 So, I feel that there needs to be a  
17 better education about that environmental impact, and  
18 I feel that it is the duty of the -- of Micron to be  
19 able to bring in the best who are super knowledgeable  
20 to try to alleviate any of the negative environmental  
21 pressures that organisms that are voiceless are going  
22 to have to endure.

23 MR. DAVIS: Ten seconds.

24 MS. HUNT: Thank you.

25 MR. DAVIS: Thank you. Any further

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 speakers that would like to speak? Yes. Oh --

3 UNKNOWN MALE: Grab my microphone.

4 MR. DAVIS: Sorry, I thought you were  
5 coming in front.

6 MR. MERCIER: Roger Mercier, 8248  
7 Wheatberry Way, Clay. I just want to say I'm against  
8 this because it's going to change Cicero and the Town  
9 of Clay in a negative way, and we live there, and we  
10 have to put up with all the congestion of the city  
11 right now, and then that's going to be moved all to  
12 the northern suburbs. It's too much to handle.

13 MR. DAVIS: Thank you. Any further  
14 speakers that have not spoken yet? One coming here.  
15 Please state your name.

16 MR. LONGO: Anthony Longo, Bayberry,  
17 Liverpool. I'm listening to a lot of the comments  
18 here, and I respect the environmental comments, and I  
19 think this project, in my opinion, remember, it was  
20 originally supposed to start in June of 2024, and now  
21 it's been pushed to November 2025.

22 And again, I respect the environmental  
23 concerns, and I think Micron and the Commerce  
24 Department and OCIDA has done a wonderful job at  
25 mitigating this project, but there are people in this

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2 community who are in poverty, who want a step up, who  
3 want to stay here.

4 There are a lot of people in this  
5 community who don't want to go to another community.  
6 They want to stay here. They want Syracuse to go to  
7 the next level. And for me, I support this project  
8 one hundred percent. My frustration is it's not  
9 moving fast enough. I wish we were coming out of the  
10 ground now.

11 And -- and again, the environmental  
12 concerns are important, but I think that people take  
13 more precedent over some environmental issues like an  
14 Indiana bat, I'm sorry. So, again, I support this  
15 project one hundred percent. This project needs to  
16 move forward.

17 I had to leave this area back in the  
18 '90s when I graduated college. I've moved back. I  
19 remember Syracuse in the 1990s when one factory after  
20 another was closing. I saw families ripped apart. I  
21 saw neighbors leave, and there was nothing more  
22 depressing than that. I decided to pursue my career  
23 elsewhere. I also have a master's degree in urban  
24 planning.

25 But sometimes you have to take that

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2           next step up, and you have to move forward, and you  
3           have to trust the system that it's worked, that  
4           you're mitigating this thing correctly, and I think  
5           that's what Micron has done, and I think that's what  
6           a lot of people in this community are trying to do.

7                         So, again, I support this project, and  
8           I want to thank everybody for putting these public  
9           meetings together.

10                        COURT REPORTER: Can you spell the  
11           last name, please?

12                        MR. DAVIS: Excuse me, sir, could you  
13           spell your last name for us?

14                        MR. LONGO: L-O-N-G-O, L-O-N-G-O. L-  
15           O-N-G-O. First name is Anthony.

16                        MR. DAVIS: Yes.

17                        MR. LONGO: All right.

18                        MR. DAVID: Now that's stuck in my  
19           head. Thank you. It's been a long day. Anyone else  
20           that would like to speak at this time that hasn't  
21           spoken? Okay. So, I'll open it up for anybody that  
22           spoke earlier in this session that either had more to  
23           say, maybe got cut off at the three-minute cutoff,  
24           and that would like to come back up for an additional  
25           opportunity to speak.

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2 Okay. Anybody would like to speak?

3 I'll ask one more time. We're here until nine  
4 o'clock, so if there's no one that wants to speak at  
5 this time, what we have been doing in the other  
6 sessions is taking a break. People may come into the  
7 lobby over the -- and what we've found is that people  
8 come in later on for the later part of the session.  
9 They might come into the lobby and fill out some more  
10 cards.

11 So, we will pause the public hearing  
12 if there's no one else that wants to speak now, and  
13 then as more people arrive and want to fill out cards  
14 or want to speak, we will then come back and un-pause  
15 and let people speak again.

16 So, I'll ask one more time if anyone  
17 here would like to speak right now for a second  
18 opportunity, please do so. Yeah, one individual  
19 coming. Thank you.

20 MR. CASELAS: Hello. My name is David  
21 Caselas. It's me again, representing the Latino  
22 community, the Mexican community. I forgot to say  
23 something. We also want the report in Spanish  
24 proving that you're going to be following  
25 international environmental laws and policies. We

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2 want those reports in Spanish and, of course, in  
3 English.

4 UNIDENTIFIED SPEAKER: We demand the  
5 respect of the Latin community and the Mexican  
6 community.

7 MR. CASELAS: Thank you.

8 MR. DAVIS: Any further comments at  
9 this time?

10 MR. STRONSKI: Yes. Hi, Ed Stronski.  
11 Just a point on the quick turnaround, the quick  
12 release of the report. I just draw the analogy to  
13 the I-81 issues where there were a lot of iterations,  
14 and the D.E.I.S. did bring up some important points.

15 One of the things there was East  
16 Genesee and Linden Corridor, some big traffic stuff  
17 that really hadn't been fully addressed. So, the  
18 timeframe of having the D.E.I.S. come out and people  
19 being able to comment on it, look at it in depth  
20 actually did address some real issues. So, and --  
21 that was then finalized in the F.E.I.S.

22 I see that -- I see that as, you know,  
23 people talking about this quick turnaround. I've  
24 seen an example where, you know, the legitimate  
25 amount of time for people to chime in had a real

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2 effect on the final report.

3 So just to give some substance to that  
4 idea that, yeah, it does make a difference in the  
5 amount of time on something. So that's just my  
6 observation that sticks in my head about that. Thank  
7 you.

8 MR. DAVIS: Thank you. Any further  
9 speakers at this time? I'll ask one more time. Any  
10 further speakers at this time? Okay. Seven twenty.  
11 We will pause. Perhaps some more folks will come in  
12 throughout the remaining hour and forty minutes of  
13 this comment session. Thank you.

14 (Off the record; 07:20 p.m.)  
15 (On the record; 07:47 p.m.)

16 MR. DAVIS: I am going to ask people  
17 if they could come back in and sit back down that are  
18 interested in speaking, listening to the remaining  
19 portion of the public hearing. It is seven forty-  
20 seven. We're going to un-pause. During this break,  
21 we did receive two comment cards for speakers, and so  
22 I will call up the commenters to speak.

23 As have been the rules from the  
24 beginning, you'll have three minutes to speak, and  
25 then I'll ask -- at the end of that three minutes,

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2 I'll call the next speaker. If there's an  
3 opportunity to speak after that, you will be  
4 recalled. The first speaker will be Fred Miller.

5 MR. MILLER: Good evening. My name is  
6 Fred Miller. I'm a resident of the Town of Clay. I  
7 assume about thirty years with community issues,  
8 conservation issues, and other issues involved with  
9 the cleanup of Onondaga Lake. Somewhat there are  
10 correlations to this project, and another other side  
11 of the fence, there are none.

12 Nonetheless, my comment will be brief.  
13 My main concern happens to be with PFAS water  
14 quality, PFAS pollution on-site, off-site, into the  
15 river, and into the water quality that would affect  
16 our drinking water system.

17 My position is very clear that every  
18 possible element of engineering and science that's  
19 available now, and as it morphs into better  
20 technologies in the future should be implemented to  
21 protect the people of the Town of Cicero, Town of  
22 Clay, and Onondaga County.

23 As you well know, the Army Corps and  
24 your New England Office and PFAS fiasco in the  
25 Skowhegan, Maine area, recent research ongoing has

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2       detected PFAS from the site right off in the coastal  
3       area of Maine. But I hope that -- my intent is that  
4       the Corps and all the parties interested work at  
5       hundred and one percent and make sure that the future  
6       generations of these communities are not affected by  
7       PFAS drinking water pollution.

8                   At my age bracket, I'm not too  
9       concerned with twenty forty-one, but those who are  
10      twenty, forty, fifty-years-old, even sixty with  
11      grandchildren, that's what we have to focus on with  
12      all intensity and make sure that all the agencies  
13      involved do not fall victim to the tremendous  
14      political outside pressure from both parties to  
15      cheerlead this project forward, and that those  
16      agencies aren't subjected to political pressure, and  
17      they use engineering and science and the best sources  
18      possible to move forth and make sure that the current  
19      people and the future generations and the children of  
20      the future in this community in this county, in this  
21      state, that we can do the best for this specific  
22      project to make sure that we're hundred and one  
23      percent to do a total job on it.

24                   That's the conclusion of my comment.

25      Thank you for your time. I appreciate it.

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2 MR. DAVIS: Thank you. Next speaker  
3 will be Lorenzo Tesoriero.

4 MR. TESORIERO: Good evening. My name  
5 is Lorenzo Tesoriero. I'm a Liverpool High School  
6 Alumni, and I currently live in Brewerton in the Town  
7 of Cicero. I am the business manager of Syracuse  
8 Local 30 Heat and Frost Insulators and I represent  
9 over hundred members.

10 We stand in support of Micron coming  
11 to Clay, New York. Local labor unions are already  
12 working heavily in our communities with pre-  
13 apprentice programs to gear up for the influx of work  
14 we will be receiving. Micron is going to generate  
15 hundreds of construction jobs on top of thousands of  
16 career opportunities that will already be bringing.

17 Micron will not only provide jobs for  
18 our current generation but for many generations to  
19 come thereafter. It will open the door to many new  
20 career opportunities in STEM and STEAM. This is a  
21 huge step in putting Syracuse back on the map.

22 I'm a father of three children, and  
23 I've had countless conversations with people whose  
24 children have had to leave Syracuse to pursue careers  
25 that aren't in demand here. With Micron, it will

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 provide our children and Syracuse residents an  
3 opportunity to stay, to grow, and to excel. Thank  
4 you.

5 MR. DAVIS: Thank you. Next speaker  
6 will be Neil Webb.

7 MR. WEBB: Good evening. My name is  
8 Neil Webb. I'm a twenty-year resident of the Town of  
9 Cicero and was raised and moved away from this area.

10 As I was growing up, watching kind of  
11 a poor economic state deteriorate in the city region,  
12 and it's really encouraging to see a project of this  
13 scale and magnitude come to the area and actually  
14 offer promise from what we've seen is a long drain of  
15 industry overall in the past history of the decades  
16 before now.

17 It's really promising for both me and  
18 my family, with the hope of having family actually  
19 remain in the area like many of the others have come  
20 in the past. So, I am here to cheer for and support  
21 this project. Thank you.

22 MR. DAVIS: Thank you. Once again,  
23 I'll open it up if there's anyone that did not fill  
24 out a comment card yet that would like to speak at  
25 this time. Anyone else that would like to speak at

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 this time? Was that a hand wave? Okay, yes. Thank  
3 you. Please state your name.

4 MS. COPPOLA: Hilary-Anne Coppola.  
5 Sorry, I didn't have enough time to say the rest of  
6 what I wanted to say previously, and this will be  
7 very short. Another gap in the D.E.I.S. is around  
8 workplace development, worker safety, and uplifting  
9 jobs for people in this area who need them the most.

10 Micron has provided investments, made  
11 promises, but it has made no enforceable commitments  
12 for good jobs for people, which means people are able  
13 to advocate for themselves, people are able to  
14 unionize, people have a good rate of pay, and people  
15 can actually access those jobs.

16 So, there's no plan for public  
17 transportation for people in the poorest parts of our  
18 county to actually get to those jobs in order to  
19 receive the benefits. So that's another gap at the  
20 D.E.I.S., and there's a gap in Micron's coming to the  
21 table around -- entering into public commitments with  
22 groups and leaders that are organizing around that  
23 issue. Thank you.

24 MR. DAVIS: Thank you. Any other  
25 folks who would like to speak at this time? Okay.



1       7/24/2025 - Micron Semiconductor Manufacturing Project  
2       filtered, it's put back into circulation as opposed  
3       to taking on, like, maybe fifty million gallons as a  
4       closed system, using it, recycling it within your  
5       system, but not putting it back into the waterways?

6               My other question I have is regarding  
7       the traffic situation. I know I saw one of the  
8       reports said they realized -- that you realized that  
9       thirty-one is going to need to be greatly expanded.  
10      As a Clay resident and traveling on the roads, are --  
11      already they're fairly busy.

12              We're going to need infrastructure and  
13      traffic control points to manage that, and I just  
14      want to know clearly what the plan is for that. I  
15      understand with this, you're not really answering the  
16      questions, but you will comment on them in the -- in  
17      the future. So, those are my two big things,  
18      particularly with the water -- with the amount of  
19      water that's being used.

20              My concern, being the health  
21      profession, is there's going to be chemicals and  
22      effects from that that may not show up for ten to  
23      fifteen to twenty years. And so, we got to make sure  
24      that this is safe for our families currently and our  
25      children and grandchildren of people who are to be in

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 this area if this is going to be here.

3 We've all seen and heard of pollution  
4 that's occurred. We want to make sure that this  
5 doesn't happen here.

6 MR. DAVIS: Great. Thank you very  
7 much.

8 MR. KEYS: Thank you.

9 MR. DAVIS: Yes, we will be  
10 responding. You didn't hear the opening remarks, but  
11 I'm taking all comments now in the comments we  
12 responded to in the Final E.I.S. document, all  
13 comments, both written and provided here this  
14 evening.

15 MR. KEYS: Perfect.

16 MR. DAVIS: Okay.

17 MR. KEYS: Thank you, guys.

18 MR. DAVIS: Thank you.

19 MR. KEYS: Have a good evening.

20 MR. DAVIS: You too. Is there anyone  
21 else that wishes to speak at this time? I see a lot  
22 of the same faces in the room as the last time I  
23 asked this, but I will continue to ask. Anyone else  
24 who wish to speak at this time? Okay. Seeing none,  
25 I will once again pause for -- we have thirty-eight

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 minutes left in the scheduled hearing time. Thank  
3 you.

4 (Off the record; 08:22 p.m.)

5 (On the record; 08:40 p.m.)

6 MR. DAVIS: Okay. I'm going to go  
7 back live. I've turned the mic on over here so we  
8 should be good. I think we're all set with the mic.  
9 We're good. I got it. So, I'm going to un-pause.  
10 We did have a speaker come in and register to speak  
11 in the last few minutes, George Robbins.

12 So, George, I'd ask you to come to the  
13 mic. Now, that one, please, because that one's on.  
14 State your name, address, and then please provide  
15 your comments for the record. Thank you.

16 MR. ROBBINS: Hello. Thank you for  
17 having me. My name is George Robbins. I live in the  
18 City of Syracuse. I just had one question because  
19 I've been to a number of Micron meetings. The last  
20 one was the -- you had the Army Corps of Engineers in  
21 Clay at the town -- at the Town Hall, and very  
22 interesting on the water issues.

23 I've been to a number of eighty-one  
24 project meetings too, and I just had one question  
25 because the number of employees over the years that

1       7/24/2025 - Micron Semiconductor Manufacturing Project  
2       you're going to hire, I'm trying to recall, somewhere  
3       between ten and fifty thousand, eventually, and then  
4       each one of those employees has families that drive  
5       cars.

6                       So, with the 81 project especially 481  
7       and 690 and traffic out here, are they going to be  
8       able to accommodate when there's multiple family  
9       members driving at the same time too? Are they  
10      really accounting -- I know they had plenty of  
11      statisticians -- statisticians for the eighty-one  
12      project. But are they really accounting for the  
13      amount of traffic for the size that Micron is and the  
14      proposed jobs that are going to be coming down the  
15      pike? Because they're not expanding lanes on four  
16      481.

17                      I used to live out in Los Angeles, so  
18      the smartest thing they did when they were building  
19      the freeways was to expand them six to -- four to six  
20      lanes. They're not doing that here. They're not  
21      forward thinking, actually. So, you've got a huge  
22      company here with huge -- not very big plans. Any  
23      thoughts on that?

24                      MR. DAVIS: So, this is not a  
25      question-and-answer period. It's a question only

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 period. This session will respond to all questions  
3 that are provided here in written comment in the  
4 Final E.I.S.

5 MR. ROBBINS: Uh-huh. Okay. Do you  
6 coordinate with 81 at all? Are you coordinating at  
7 all with the 81 project?

8 MR. DAVIS: Again, we'll -- we'll  
9 respond to all questions and comments in the Final  
10 E.I.S.

11 MR. ROBBINS: Oh, okay.

12 MR. DAVIS: Thank you.

13 MR. ROBBINS: All right. Thank you.

14 MR. DAVIS: Is there anyone else that  
15 wishes to speak at this time? Okay. Any other  
16 questions, comments at this time? Okay. We will  
17 pause again and see if anyone else shows up for  
18 further comment.

19 (Off the record; 08:43 p.m.)

20 (On the record; 08:51 p.m.)

21 MR. DAVIS: Okay. We have another  
22 speaker that has come in to register, so we will go  
23 back on the record, un-pause if you will. And we  
24 have MoAde Jagusah, and I'll ask you to please come  
25 to the mic. This is a question period. It's not a

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 question-and-answer period, but please state your  
3 questions and comments for the record. We have a  
4 Court Reporter here and offer your time. Thank you.

5 MS. JAGUSAH: My first question is in  
6 regards to the lead in the water of the pipes when it  
7 comes to the City of Syracuse, whether there is any  
8 intention on replacing or providing funding to  
9 replace the lead water pipes in order to ensure the  
10 safety of the human beings who live here, as well as  
11 ensure that the water you guys are using is clean.  
12 So that's my -- my first question.

13 My second question is regarding the  
14 land that is going to be needed. There's going to be  
15 housing needed around that, and I'm wondering whether  
16 there is any consideration as to the demographic  
17 shifts that are being enforced by the City of  
18 Syracuse and whether anybody in any governmental  
19 agency or any business or any nonprofit involved in  
20 this project has any interest specifically in any  
21 piece of land that exists within the City of Syracuse  
22 when it comes to housing, because there is currently  
23 talk of a lot of housing demolition being going on.

24 And that housing demolition is  
25 something that would be done across a large number of

1       7/24/2025 - Micron Semiconductor Manufacturing Project  
2       people, and I'm wondering if there's any  
3       consideration for the displacement plan for those  
4       people. Because those people currently do not have a  
5       displacement plan, and the moving of people is being  
6       done, supposedly at least in the intention of making  
7       sure that there are the correct types of workers for  
8       this project in the correct locations.

9                   And I am wondering if Micron or anyone  
10       involved in Micron, or like I said, is involved in  
11       any of those demographic shifts that are happening,  
12       because the ethnic cleansing that is going on in  
13       Syracuse right now of African-Americans specifically  
14       from the south side of Syracuse is something that  
15       should interest everybody involved in the project.  
16       Yeah, do you guys answer questions or anything like  
17       that? Okay.

18                   MR. DAVIS: Not at this session, no.

19                   MS. JAGUSAH: Uh-huh.

20                   MR. DAVIS: This time we may go off.  
21       We have a three-minute consistent for every speaker.  
22       And so, if it does go, I'll ask if anyone else wants  
23       to speak.

24                   MS. JAGUSAH: Uh-huh.

25                   MR. DAVIS: If you want to speak again

1       7/24/2025 - Micron Semiconductor Manufacturing Project  
2       and no one else comes up, you will have another three  
3       minutes to speak, so you can compose yourselves more  
4       if you'd like to think about what your thoughts are  
5       going to be.

6                   MS. JAGUSAH: Sounds good. Thank you.

7                   MR. DAVIS: You're welcome.

8                   MS. JAGUSAH: Yeah. In regards to the  
9       wetlands, I'm wondering if there's any thoughts in  
10      mind regarding insurance as to flooding that will be  
11      happening.

12                   MR. DAVIS: Sure. Is there anyone  
13      else that wishes to speak at this time? Seeing no  
14      one, if you would like another opportunity to speak.

15                   MS. JAGUSAH: In regards to the  
16      flooding that will be happening as a consequence of  
17      this project, I do believe that the filling in of  
18      this unprecedented number of wetlands will increase  
19      flooding in the general water basin area that the  
20      project is happening.

21                   And because Syracuse is close enough  
22      to that water basin, the fact that Syracuse's south  
23      side, which is predominantly African-American,  
24      already experiences predominant, how do you say,  
25      higher rates of flooding than other parts of cities.

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 When you overlay the map of redlining and covenants  
3 that happened in Syracuse, that map overlays with the  
4 flood zones.

5 So, if you guys are going to be  
6 filling in the wetlands, what sorts of financial  
7 incentives are you going to be giving people in order  
8 to ensure that their flooding is assuaged? Thank  
9 you.

10 MR. DAVIS: Thank you. Are there any  
11 other speakers that wish to speak at this time?  
12 Okay. We have four minutes. We may have another  
13 speaker that arrives late, so three minutes. We'll  
14 have three more minutes, and then at that time, I'll  
15 officially close the public hearing session. Thank  
16 you.

17 (Off the record; 08:57 p.m.)

18 (On the record; 08:59 p.m.)

19 MR. DAVID: Is there anyone here at  
20 this time that wishes to speak? Hearing none, seeing  
21 none, I will close the public hearing. All comments  
22 that were submitted at this public hearing and those  
23 that were received in writing will be responded to in  
24 the Final E.I.S.

25 Any comments that the public would

1       7/24/2025 - Micron Semiconductor Manufacturing Project  
2       like to include in the administrative record for this  
3       hearing need to be presented or submitted to our  
4       staff so that we can respond to those in the F.E.I.S.

5                   If you elected not to speak this  
6       evening, you may still submit written comments until  
7       August 11 to OCIDA or C.P.O. using the mailing  
8       address or email address that have been posted on the  
9       screen behind me and are -- they're both also  
10      available on the OCIDA and C.P.O. websites. Written  
11      comments carry the same weight as comments that have  
12      been given here today.

13                   All of us here appreciate you having  
14      turned out this evening and presenting your views.  
15      We respect your comments and can be assured that  
16      we've given the appropriate consideration in the  
17      evaluation regarding this -- this proposal. Thank  
18      you very much. At this time, we are adjourned.  
19      Thank you.

20                   (The hearing concluded at 09:00 p.m.)

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1           7/24/2025 - Micron Semiconductor Manufacturing Project  
2  
3           STATE OF NEW YORK  
4           I, CARI RORABACK, do hereby certify that the  
5           foregoing was reported by me, in the cause, at the time  
6           and place, as stated in the caption hereto, at Page 1  
7           hereof; that the foregoing typewritten transcription,  
8           consisting of pages number 1 to 78, inclusive, is a true  
9           record prepared by Associated Reporters Int'l., Inc. from  
10          materials provided by me.

11                                IN WITNESS WHEREOF, I have hereunto  
12           subscribed my name, this the 31st day of July, 2025.

13           *Cari Roraback*  
14           CARI RORABACK, Reporter

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| <p><b>Wheatberry</b> 57:7<br/> <b>Wheeler</b> 2:16 26:11 28:25 29:3,4<br/> <b>WHEREOF</b> 79:10<br/> <b>White</b> 7:5<br/> <b>wide</b> 50:24<br/> <b>wildlife</b> 26:25 28:18 37:22<br/> 48:15,16<br/> <b>willing</b> 31:13,24<br/> <b>wind</b> 20:9 35:20<br/> <b>wish</b> 9:14,21 16:19 17:8 58:9<br/> 70:24 77:11<br/> <b>wishes</b> 16:24 17:11 49:17 70:21<br/> 73:15 76:13 77:20<br/> <b>WITNESS</b> 79:10<br/> <b>wonderful</b> 35:3 57:24<br/> <b>wondering</b> 39:11 54:3 74:15 75:2<br/> 75:9 76:9<br/> <b>word</b> 43:17,18<br/> <b>work</b> 11:8 13:25 14:8,14 19:3<br/> 31:10 33:25 43:19 45:14,19,21<br/> 46:7 49:2 54:13 64:4 65:13<br/> <b>worked</b> 30:2 45:9,12 59:3<br/> <b>worker</b> 67:8<br/> <b>workers</b> 33:16 75:7<br/> <b>workforce</b> 21:9<br/> <b>working</b> 11:9 30:3,5,19 34:22<br/> 55:18 65:12<br/> <b>workplace</b> 67:8<br/> <b>works</b> 25:20 50:6<br/> <b>world</b> 18:13 38:13<br/> <b>worst-case</b> 40:18<br/> <b>worthwhile</b> 28:24<br/> <b>writing</b> 16:6 53:8 77:23<br/> <b>written</b> 6:14 7:18 10:3,8 11:19<br/> 15:15 22:3 49:22 70:13 73:3<br/> 78:6,10</p> <hr/> <p style="text-align: center;"><b>X</b></p> <hr/> <p style="text-align: center;"><b>Y</b></p> <hr/> <p><b>Yang</b> 2:19 37:8 39:16,17,18,19<br/> <b>yeah</b> 60:18 62:4 75:16 76:8<br/> <b>year</b> 29:19 39:24<br/> <b>years</b> 7:3 24:17 26:14 29:5 30:3<br/> 37:19,21 38:9,23 39:21 44:6<br/> 45:4,7,9,12 63:7 69:23 71:25<br/> <b>yesterday</b> 24:18<br/> <b>YMCA</b> 30:20<br/> <b>York</b> 1:2,11,17 5:25 6:24 7:7<br/> 8:10,11 13:4 14:17 20:2,24</p> | <p>21:6,17 24:10 30:10,24 32:6<br/> 32:13 33:9,13 34:7 35:15 36:7<br/> 37:11 39:7,22 44:16,19 45:14<br/> 46:8 47:10 50:4 54:22 65:11<br/> 79:2<br/> <b>young</b> 43:11</p> <hr/> <p style="text-align: center;"><b>Z</b></p> <hr/> <p><b>ZENNA</b> 2:12<br/> <b>zero</b> 14:9,10<br/> <b>zip</b> 39:20 47:10<br/> <b>zones</b> 28:19 77:4</p> <hr/> <p style="text-align: center;"><b>0</b></p> <hr/> <p><b>07:20</b> 62:14<br/> <b>07:47</b> 62:14<br/> <b>07:55</b> 68:8<br/> <b>08:19</b> 68:9<br/> <b>08:22</b> 71:4<br/> <b>08:40</b> 71:5<br/> <b>08:43</b> 73:19<br/> <b>08:51</b> 73:20<br/> <b>08:57</b> 77:17<br/> <b>08:59</b> 77:18<br/> <b>09:00</b> 78:20</p> <hr/> <p style="text-align: center;"><b>1</b></p> <hr/> <p><b>1</b> 79:5,7<br/> <b>11</b> 9:25 15:4,10 78:7<br/> <b>114</b> 53:19<br/> <b>11th</b> 11:20<br/> <b>13041</b> 39:20<br/> <b>13090</b> 1:17<br/> <b>13204</b> 47:10<br/> <b>13206</b> 20:24<br/> <b>13210</b> 18:8<br/> <b>14</b> 6:22 7:23<br/> <b>14001</b> 46:16<br/> <b>18</b> 15:9<br/> <b>1961</b> 37:12<br/> <b>1990s</b> 58:19</p> <hr/> <p style="text-align: center;"><b>2</b></p> <hr/> <p><b>2021</b> 9:25<br/> <b>2023</b> 6:22 7:10,23<br/> <b>2024</b> 8:2 57:20<br/> <b>2025</b> 1:14 6:10,13 8:15 15:4<br/> 57:21 79:11<br/> <b>24</b> 1:14 7:10<br/> <b>25</b> 6:10</p> |
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| <p><b>27</b> 6:13</p> <hr/>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <p><b>8248</b> 57:6</p> <hr/>                     |
| <p style="text-align: center;"><b>3</b></p> <hr/>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <p style="text-align: center;"><b>9</b></p> <hr/> |
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| <p style="text-align: center;"><b>5</b></p> <hr/>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                   |
| <p><b>5171</b> 7:6<br/> <b>5439</b> 42:15<br/> <b>559</b> 18:7<br/> <b>5756</b> 26:13</p> <hr/>                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                   |
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| <p style="text-align: center;"><b>8</b></p> <hr/>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                   |
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1 7/24/2025 - Micron Semiconductor Manufacturing Project

2 STATE OF NEW YORK

3 ONONDAGA COUNTY INDUSTRIAL DEVELOPMENT AGENCY

4 U.S. DEPARTMENT OF COMMERCE CHIPS PROGRAM OFFICE

5 U.S. ARMY CORPS OF ENGINEERS

6  
7 Public Hearing on NEPA-SEQRA Draft Environmental  
8 Impact Statement and Clean Water Act Section 404

9 Permit Application

10 Micron Semiconductor Manufacturing Project,  
11 Clay, New York

12 SESSION TWO

13 VIDEO RECORDED PUBLIC HEARING

14 DATE: July 24, 2025 at 2:01 p.m.

15 LOCATION: Liverpool High School

16 4338 Wetzels Road

17 Liverpool, New York 13090

18  
19  
20 Reported by Cari Roraback

21  
22  
23  
24  
25

1 7/24/2025 - Micron Semiconductor Manufacturing Project

2 APPEARANCES:

3 JEFF DAVIS ESQ., BARCLAY DAMAN counsel FOR OCIDA

4 ROBERT PETROVICH, EXECUTIVE DIRECTOR OF OCIDA

5 DAVID FRENKEL, DIRECTOR OF THE CHIPS PROGRAM

6 LT. COL. ROB BURNHAM, COMMANDER OF THE BUFFALO

7 DISTRICT, U.S. ARMY CORPS. OF ENGINEER

8 MARTY WARGO, CHIEF OF BUFFALO DISTRICT REGULATORY

9 BRANCH

10 CARLOS AGUIRRE, SPANISH INTERPRETER

11 MAGGIE RUSSELL, ASL INTERPRETER

12 ZENNA PRELI, ASL INTERPRETER

13 PUBLIC SPEAKERS:

14 JODY MANNING

JOHNNY M.

15 DAN TROIANO

LINDA LEMURA

16 ELLEN BLOCK

ANDY TADDEO

17 TOM LAW

EVELYN INGRAM

18 LES MONOSTORY

DAVID BOTTAR

19 MATTHEW TAROLLI

ALICE DOVE

20 JOSS WILLSBROUGH

MERIKE TREIER

21 LOUISE HOTALING

ANTHONY TUBOLINO

22 STEVEN KOEGEL

ROGGIE DREW

23 JIM NISTICO

STEVE FOURNIER

24 SYDNI BARNETT

25

1 7/24/2025 - Micron Semiconductor Manufacturing Project

2 CAL ROBINSON  
TIMOTHY RIINA-FERRIE  
3 TRENT GARDNER  
DR. WARREN HILTON  
4 RAUL HUERTA  
RAYMOND D'HOLLANDER  
5 BRENT BLEIER  
BRAD SANTEE  
6 SUSAN FLICK  
LIZA BERNARD

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1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 (The public hearing commenced at 2:01  
3 p.m.)

4 MR. PETROVICH: Good afternoon,  
5 everyone. This is a continuation of the public  
6 hearing, the afternoon session public hearing on the  
7 NEPA, SEQRA Draft Environmental Impact Statement and  
8 Clean Water Act Section 404 Permit Application in  
9 connection with the Micron Semiconductor  
10 Manufacturing Project in Clay, New York.

11 A couple of housekeeping items for  
12 this afternoon before we get started is to make sure  
13 that you understand where the exits are, that are  
14 clearly marked, and that the restrooms are located  
15 just outside of the exits if they're needed. And we  
16 have law enforcement and security personnel on site,  
17 should that also be needed this afternoon.

18 We also have American Sign Language  
19 and Spanish Language Interpreters available right  
20 over here. And should anyone need those services,  
21 please let the registration desk personnel know, and  
22 we'll be happy to get you connected with those  
23 services. And I think now we're going to have it  
24 said in Spanish.

25 (Spanish translation)

1 7/24/2025 - Micron Semiconductor Manufacturing Project

2 MR. PETROVICH: Okay. Thank you. My  
3 name is Robert Petrovich. I'm the Executive Director  
4 of the Onondaga County Industrial Development Agency,  
5 or OCIDA. I, along with legal counsel, Jeff Davis,  
6 who will be moderating this public hearing.

7 Seated with me at the table is David  
8 Frenkel, who is the Director of the Environmental  
9 Division of the CHIPS Program Office, or C.P.O.,  
10 which is part of the U.S. Department of Commerce.  
11 Mr. Frenkel will also be making some opening remarks  
12 very shortly.

13 I would also like to introduce  
14 Lieutenant Colonel Robert Burnham, Commander of the  
15 Buffalo District of the U.S. Army Corps of Engineers.  
16 Colonel Burnham will be making opening remarks as  
17 well. Also seated at the table is Marty Wargo, Chief  
18 of the Buffalo District Regulatory Branch.

19 The purpose of today's hearing is to  
20 give members of the public an opportunity to provide  
21 verbal comments on the Environmental Review of  
22 Microns Proposed Semiconductor Manufacturing Project  
23 and Connected Actions, which OCIDA and C.P.O. are  
24 jointly conducting under the New York State  
25 Environmental Quality Review Act, or SEQRA, and the

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 National Environmental Policy Act, or NEPA, as well  
3 as to provide comments on the review of Microns  
4 proposed impacts to waters of the United under  
5 Section 404 of the Clean Water Act, which is being  
6 conducted by the Army Corps of Engineers.

7 OCIDA and C.P.O. released the Draft  
8 Environmental Impact Statement of E.I.S. for the  
9 Micron Project on June 25, 2025. The Army Corps of  
10 Engineers issued public notice of Microns permit  
11 application under Section 404 of the Clean Water Act  
12 on June 27th, 2025.

13 Information on how to provide written  
14 comments on either the Draft E.I.S. or the Section  
15 404 review displayed on alternating slides behind us  
16 and -- and also I think in the front the room, unless  
17 this is in front of the room.

18 With respect to the SEQRA process  
19 today, most of you in attendance are familiar with  
20 the project. However, I would like to provide a  
21 brief review of what has occurred thus far in the  
22 environmental review process.

23 On July 14th, 2023 OCIDA received an  
24 application for financial assistance from the Micron,  
25 New York Semiconductor Manufacturing, L.L.C. entity.

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 Most of you are aware Micron intends to invest  
3 approximately one hundred billion dollars over the  
4 next twenty years to build a leading-edge  
5 semiconductor manufacturing campus in the Town of  
6 Clay and to the expand in White Pine Commerce Park  
7 located at 5171 Route 31 in the Town of Clay, New  
8 York.

9 The proposed project must be reviewed  
10 under SEQRA in accordance with the requirements of  
11 SEQRA. And on September 14th, 2023, OCIDA declared  
12 itself as the lead agency for SEQRA purposes. OCIDA  
13 issued a positive declaration due to the proposed  
14 projects potential to result in one or more  
15 significant adverse impacts and declared its intent  
16 to prepare a Draft Environmental Impact Statement.

17 OCIDA then undertook the next step,  
18 which is scoping. Scoping is a process that develops  
19 a written document, The Scope, which outlines the  
20 topics and analysis of potential environmental  
21 impacts to be studied and addressed in the Draft  
22 E.I.S.

23 Following public comment, OCIDA  
24 adopted the final SEQRA Scope of December 14th, 2023.  
25 The public was also previously given an opportunity

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 to comment on the Scope for this project on in March  
3 of 2024. Following the adoption of the final SEQRA  
4 Scope, OCIDA to engage with C.P.O. and others to  
5 begin the process of preparing the Draft E.I.S.,  
6 which evaluates the potential environmental effects  
7 of the proposed project.

8                   During development of the Draft E.I.S.  
9 OCIDA regularly consulted with other SEQRA involved  
10 and interested agencies, including the New York State  
11 Department of Environmental Conservation and the New  
12 York State Department of Transportation to ensure  
13 that all environmental impacts were identified and  
14 fully evaluated in the -- in the Draft E.I.S.

15                   On June 25, 2025, OCIDA determined  
16 that the Draft E.I.S. was complete for commencement  
17 of the public review pursuant to SEQRA and open the  
18 public comment period. The purpose of this afternoon  
19 session, as well as this evening session to come, is  
20 for the public -- it is for a public hearing to  
21 receive comments on the Draft E.I.S., as well as for  
22 the Section 404 review, which Colonel Burnham will  
23 outline shortly.

24                   Please note this is not a question-  
25 and-answer session. We will not respond or reply to

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 comments expressed by the public during this hearing.  
3 We will, likewise, not respond to any questions posed  
4 by the public during this hearing. OCIDA and C.P.O.  
5 will respond to all comments as part of the final  
6 E.I.S.

7 This is an opportunity for the public  
8 to place their comments on the Draft E.I.S. and the  
9 Section 404 review on the record. OCIDA encourages  
10 the public to participate in the process. This is  
11 your opportunity to have your voice heard, however,  
12 this hearing is not your only opportunity to submit  
13 comments on the Draft E.I.S. or the 404 review.

14 If you do not wish to make a comment  
15 here at this hearing, you can also submit your  
16 comments on the Draft E.I.S. or the 404 review, which  
17 we'll address shortly, using the information  
18 displayed on the slides in this room. We have extra  
19 copies of notices on how to comment available for you  
20 if you wish to make -- if you wish to take a copy.

21 The OCIDA notice and the contact  
22 information for submitting comments can also be found  
23 on OCIDA's website. Public comments will be accepted  
24 through August 11th, 2025. Your input, both verbal  
25 comments received here this afternoon, as well as all

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 written comments that are received by OCIDA and  
3 C.P.O. will help OCIDA and C.P.O. prepare a final  
4 E.I.S., which will be released after all comments  
5 have been received and considered.

6 It's important to note that equal  
7 weight will be given to both verbal comments and  
8 written comments. There is a Court Reporter here  
9 this afternoon, who will be making a record of all  
10 comments made. We ask those in attendance to please  
11 show respect for the person that is speaking, even if  
12 you cannot agree with the comment and also to please  
13 hold applause or other noise, so that we may make as  
14 an accurate record as possible in this proceeding.

15 At this point, I would like to turn  
16 this over to David Frenkel, our C.P.O. colleague, for  
17 his comments.

18 MR. FRENKEL: Good afternoon. As Rob  
19 mentioned, my name is David Frenkel. I am the  
20 Director of the Environmental Division for the CHIPS  
21 Program Office or C.P.O., which is part of the U.S.  
22 Department of Commerce.

23 C.P.O. is the lead federal agency for  
24 the environmental review of this project under the  
25 National Environmental Policy Act, or NEPA. Based on

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 C.P.O.'s role in providing direct funding to Micron  
3 for the proposed semiconductor manufacturing  
4 facility.

5 Our project requires both the federal  
6 and state environmental review. It is not uncommon  
7 for lead agencies at the federal and state level to  
8 work together to prepare a single comprehensive  
9 document. C.P.O. has been working with OCIDA to  
10 prepare the Draft E.I.S. on that basis. The E.I.S.  
11 is a joint document under NEPA and SEQRA, and my role  
12 today is to accept public comments as part of the  
13 NEPA process on behalf of C.P.O. and the U.S.  
14 Department of Commerce.

15 C.P.O. also encourages public  
16 participation in this process and welcomes all  
17 comments on the Draft E.I.S. We will give equal  
18 weight to verbal comments of today's hearing and  
19 written comments submitted to C.P.O. or OCIDA by  
20 August 11th.

21 As Rob noted, after the close of the  
22 public comment period, C.P.O. and OCIDA will respond  
23 to all comments received when we prepare the final  
24 E.I.S. While C.P.O. and OCIDA jointly prepared this  
25 E.I.S, because it is a comprehensive document that

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 identifies the potential effects of the Micron  
3 project, it will also serve as a resource for other  
4 agencies conducting their own reviews of the Micron  
5 project and other actions connected to the project.

6 On that note, I would now like to turn  
7 it over to Lieutenant Colonel Burnham for opening  
8 remarks of the U.S. Army Corps of Engineers. Thank  
9 you for your attendance today at this public hearing,  
10 and we appreciate your participation in this process.

11 MR. BURNHAM: Thank you, David. Good  
12 -- good afternoon, ladies and gentlemen. Again, I'm  
13 Lieutenant Colonel Rob Burnham, Commander of the  
14 Buffalo District Army Corps of Engineers. I -- I  
15 would be pre -- presiding. I would be the presiding  
16 officer for the Clean Water Act Section 404 aspect of  
17 this public hearing on behalf of the Army Corps of  
18 Engineers. Seated up here with me to my right, your  
19 left is Mr. Marty Wargo, the Chief of the Buffalo  
20 District Regulatory Branch.

21 While the Department of Commerce is  
22 the lead federal agency on the E.I.S. for this  
23 project, the Corps of Engineers is the cooperating  
24 agency on E.I.S., and we are here to specifically  
25 retain information and evidence and receive public

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 comment to assist in the regulatory review of a  
3 permanent application by Micron, New York  
4 Semiconductor as well as for two connected actions  
5 proposed by National Grid for a gas main and electric  
6 sub -- substation expansion.

7 Because of the Micron in that National  
8 Grid Projects proposed the placement of fill into  
9 federal regulated wetlands and streams, collectively  
10 referred to as the waters of the United States,  
11 permits are required from the Corps of Engineers  
12 pursuant to Section 404 of Clean Water Act. The  
13 Department of the Army authorization is therefore  
14 required for the following.

15 For the Micron Semiconductor  
16 Manufacturing campus, the permanent loss of  
17 approximately one hundred and ninety-four acres of  
18 federally regulated wetlands and temporary impacts to  
19 an additional two point nine five acres, as well as  
20 the permanent loss of six thousand two hundred and  
21 eighty-three feet of federally regulated streams and  
22 ditches and temporary impacts to an additional a  
23 hundred and thirty feet.

24 For the National Grid Substation work,  
25 the permanent impact to approximately four acres of

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 wetland and one thousand five hundred and forty-five  
3 feet of regulated ditches, as well as temporary  
4 impacts to an additional eleven acres of wetland and  
5 six hundred and eighty-three feet of stream.

6 And for the National Grid gas main  
7 work, the permanent impact to approximately point  
8 zero eight seven acres of wetlands, conversion of  
9 point zero three three acres of forested wetlands,  
10 and temporary impacts to approximately seven point  
11 four acres of wetlands and one hundred and seventy-  
12 five linear mainstream.

13 The purpose of -- the purpose for the  
14 proposed work is to construct and operate  
15 commercially viable and globally competitive advanced  
16 DRAM fabrication facility on a single unified site in  
17 New York State. The Corps of Engineers is neither a  
18 proponent for, nor an opponent of the proposed  
19 projects. Our role is to determine whether these  
20 proposed field activities are contrary to the public  
21 interests or not.

22 This hearing will play an important  
23 part in that determination. The hearing will be  
24 conducted according to the procedures set forth, the  
25 Title 33 of the Code of Federal Regulations Part 327.

1 7/24/2025 - Micron Semiconductor Manufacturing Project

2 The public comment period for the  
3 Corps of Engineers, public notice also closes on  
4 August 11th, 2025. Hard copies of the public notices  
5 are available in the registration area. Please note  
6 that there is a typo in some of the public notices  
7 indicating that comment period closes on August 18th.  
8 The correct date is August 11th.

9 Details on how to comment on the  
10 proposed wetland and stream impacts may be found in  
11 public notice, as well as displayed on the screen in  
12 the front of the room.

13 The comments made here, plus all  
14 submitted written information will become part of the  
15 Corps of Engineers Section 404 administrative record  
16 and will be used to evaluate the probable impacts,  
17 including the cumulative impacts of the proposed  
18 activity on the public interest.

19 The ultimate decision on the submitted  
20 applications will reflect the national concern for  
21 both the protection and utilization of important  
22 resources. The Corps of Engineers permit decisions  
23 will come after completion of the E.I.S. because  
24 we're also relying upon that for the purposes of NEPA  
25 compliance.

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 Based on the -- based on time  
3 limitations, if anyone desires an opportunity for  
4 rebuttal to any of the information presented in this  
5 hearing, we ask that you please do so in writing and  
6 provide that to someone at the registration table  
7 today, and it will become a part of administrative  
8 record.

9 General comments made may also be  
10 submitted until close of the public comment period.  
11 Thank you, and I look forward to your comments.

12 MR. PETROVICH: Thank you, Lieutenant.  
13 Thank you, Lieutenant Colonel Burnham. I would like  
14 to now introduce OCIDA's Counsel Jeff Davis, who will  
15 go over the process for how we will conduct the  
16 hearing and also manage the flow of speakers. Jeff?

17 MR. DAVIS: Thank you. Good  
18 afternoon. If you do come forward to make comments,  
19 we'll ask that you please state your name and address  
20 and also speak clearly and slowly so that the Court  
21 Reporter can make an accurate record.

22 We have two microphones here at the  
23 front of the room. Your comments will be limited to  
24 three minutes to afford everyone who wishes a comment  
25 an opportunity to do so. There's no ceding of time

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2 to others. If there is time at the end of the  
3 sessions, speakers may return to the microphone and  
4 will be afforded an additional three minute  
5 opportunity to speak.

6 Please note that if you already  
7 commented in the earlier session today and wish to  
8 make additional comments during this session, we're  
9 allowing persons who have not made comments the  
10 opportunity to go first. However, time permitting,  
11 our goal is to allow everyone who wishes to speak at  
12 this session an opportunity to do so.

13 I'll call those who have signed up to  
14 submit comments to the microphone one by one in order  
15 to allow as many, to be heard as possible, and we'll  
16 announce the next person to comment and ask them to  
17 proceed quietly to the front of the room while the  
18 commenter before them is speaking.

19 If you've not yet signed up but you  
20 wish to make a comment, you can complete a comment  
21 card in the back of the lobby. Again, there's two  
22 microphones on either side. And we're going to start  
23 things off today with our first speaker, Jody  
24 Manning. And the next speaker after that would be  
25 Johnny M.

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2 MR. MANNING: Thank -- thank you.

3 Jody Manning, Cicero, New York. As the Executive  
4 Director for New York State's first ever regional  
5 STEAM high school in the Syracuse City School  
6 District, I want to express my sincere appreciation  
7 for Micron's unwavering commitment to education in  
8 our region.

9 From day one, Micron has been a  
10 crucial partner in getting this transformational  
11 project off the ground. Their support has gone far  
12 beyond just funding. They have brought vision,  
13 collaboration, and a genuine investment in our  
14 students' futures. Thanks to Micron, we're building  
15 more than just a school; we're building a launchpad  
16 for the next generation of innovators right here in  
17 Central New York.

18 They've shown up at the table, not  
19 just as a sponsor, but as a true thought partner.  
20 This is the kind of public-private partnership that  
21 redefines what's possible for our schools, students  
22 and community. Thank you.

23 MR. DAVIS: Thank you. Next is Johnny  
24 M. And after Johnny, will be Dan Troiano?

25 MR. TROIANO: Troiano.

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2 MR. DAVIS: Troiano.

3 MR. JOHNNY M: Hello. John M. of  
4 Clay. I just understand that you're not able to  
5 respond. So, my understanding that there's about  
6 five million gallons of water coming out of one  
7 watershed, Lake Ontario, into another -- going into  
8 Micron. And then eventually being dumped into the  
9 Oneida river.

10 It's five million gallons per day not  
11 being used to make anything there, just being used  
12 for cooling, whatever. Primary -- probably all of  
13 those five million gallons are then going to be  
14 dumped into the Oneida River. And I just want to  
15 make sure that environmental issue has been touched.

16 Arizona has Taiwan Semiconductor built  
17 in Phoenix in the desert. So, I'm a little confused  
18 here with this water issue. I consider that a lot,  
19 as a layman, flooding potential. Thank you.

20 MR. DAVIS: Thank you. Dan? And then  
21 after Dan, is Linda LeMura.

22 MR. TROIANO: Dan Troiano. Hastings,  
23 New York, seven miles away. Welcome to the Micron  
24 bordello, home of the lying corporate welfare whore  
25 politician. Micron's locating here for our cheap

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 electricity.

3 Cheap electricity is news that  
4 thousands of National Grid customers are bailed out  
5 by politician Hochul, which they couldn't pay their  
6 bills. Ashley National Grid got the corporate  
7 welfare bailout check from Hochul. And speaking of  
8 corporate welfare, how about the millions given to  
9 three Oswego County nuclear plants every year to make  
10 them profitable? Nuclear plants that have had their  
11 licenses extended too many times at the expense of  
12 safety.

13 Building the Micron bordello is  
14 predicated on these three nukes that are scheduled to  
15 be decommissioned in four years. Experts agree to  
16 continue to operate these nukes as uncharted  
17 territory as far as accidents, leaks, meltdowns, et  
18 cetera, since no nuke has ever been run this long  
19 past its expiration date, not to mention no more than  
20 one hundred caps spent radioactive waste stored there  
21 on a fault line, that's had two earthquakes in the  
22 past year, waste that has to be kept safe for forty  
23 thousand more years. For reference, forty thousand  
24 years ago, we were spitting and pissing in caves.

25 And thanks to the Price-Anderson Act,

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2 the nukes don't carry enough insurance to cover a  
3 meltdown, and they're indemnified in cases of  
4 negligence or willful misconduct. The rest of us  
5 have to go to evacuate to the fairgrounds without our  
6 pets, without our firearms, and taxpayers are on the  
7 hook for any cleanup.

8 Micron will also dump and accelerate  
9 millions of tons of PFAS forever chemical carcinogens  
10 into the air and waters of the Oneida Lake's  
11 watershed and Oneida's, Oswego rivers where tens of  
12 thousands of people live and obtain drinking water  
13 from OCWA.

14 New York State doesn't regulate PFAS  
15 compounds, but Minnesota does. They outlawed all  
16 PFAS use to production and fined three and a half  
17 billion dollars for contaminating drinking water that  
18 has led to cancer deaths of at least twenty-one  
19 primary, middle and high school students in fifteen  
20 years, laws named for Amara Strande, who fought for,  
21 while she was dying of liver cancer at the age of  
22 twenty years old. And Minnesota needs millions more  
23 for cleanup of toxic waste.

24 All this so taxpayers can dish out  
25 corporate welfare due to the tune of four million

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2 dollars per job, most of the jobs pay twenty-one  
3 dollars an hour. Why would smart politicians like  
4 crying Schmuck Schumer and Chrisco Billygaffe pay  
5 four million dollars for a twenty-one dollar an hour  
6 job? Because this was never about jobs.

7 The first eleven recipients of CHIPS  
8 Act money spent over forty-seven billion dollars,  
9 buying back stock to artificially inflate stock  
10 value. And four more CHIP companies plan on spending  
11 fourteen billion dollars this year alone.

12 Stock buybacks. The CHIPS Act  
13 prohibits this, but it got lost on Pam Bondi's desk.  
14 And our local politicians are looking forward to  
15 creating a real estate feeding frenzy. Will raise  
16 our property taxes and throw us and our families out  
17 of our homes while their political pimps profit off  
18 our misfortune. That's Microns own words.

19 MR. DAVIS: Ten seconds.

20 MR. TROIANO: Confirm. Unfortunately,  
21 some people will no longer be able to afford to live  
22 here. The best part is that both political parties  
23 are in on it. A true bipartisan corporate welfare  
24 whore politician lovefest at our expense, the expense  
25 of our families, our health, our safety, our

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 environment, and our futures.

3 MR. DAVIS: Thank you.

4 MR. TROIANO: No problem.

5 MR. DAVIS: Linda is next and then  
6 Ellen Block.

7 MS. LEMURA: Good afternoon. Thank  
8 you for this opportunity. Linda LeMura, LeMoyne  
9 College, 1419 Salt Springs Road, Syracuse, New York.  
10 I am not a geologist nor a climatologist, and I do  
11 not play one on T.V.

12 However, I am married to one. And on  
13 our campus there's great debate about the carbon that  
14 will be released into the atmosphere. So I would  
15 like to speak to that in the spirit of the topic of  
16 today's meeting.

17 I quote, the issue of carbon storage  
18 in the wetlands to be disrupted is not quite as large  
19 as people might think. Yes, wetlands store large  
20 amounts of carbon in the soil because the high water  
21 saturation prevents decomposition.

22 So, the removal of all the wetland  
23 soil over several hundred acres seems like a lot. If  
24 the soil is allowed to decompose, the carbon goes  
25 back into the atmosphere. But if the soil is used

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2 elsewhere for the fill, the carbon impact will be  
3 lessened.

4 Now, Micron has stated that they will  
5 construct new wetlands as an offset for the release  
6 of the wetlands. I think that's important to note.  
7 The other message regarding flooding. We are given  
8 this opportunity to express our concerns and can  
9 mitigate that during processes like these, and they  
10 can and will be in fact addressed. I'd like to say  
11 as a native of Syracuse, a Northsider, I grew up in a  
12 time, and I'm trying not to age myself, when this was  
13 the patent capital of the world with manufacturing,  
14 and it's been a rough forty years here.

15 Nothing makes me happier than as a  
16 native Syracusan, Northsider, New Yorker, to see the  
17 hope and the promise that Micron will bring to our  
18 community to ameliorate poverty and to excite the  
19 next generation of young people regarding the -- the  
20 importance of science in the Twenty-first Century.

21 It's not a perfect project. If we  
22 could find one of those, call me at LeMoyne College,  
23 I'll make myself available. I am deeply grateful for  
24 this opportunity. And then I am at the end of,  
25 toward the end, don't date me, of my career. And to

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2 know that we'll be able to entice individuals to come  
3 to this community because of all that Micron, its  
4 supply chain businesses will do for this -- for this  
5 area that has already endured enough, I cannot thank  
6 Micron enough and everyone who made this possible,  
7 and to God for putting all the water here. I thank  
8 you.

9 MR. DAVIS: Thank you. Next is Ellen  
10 Block. And after Ellen will be Andy Taddeo.

11 MS. BLOCK: Good afternoon, gentlemen.  
12 My name is Ellen Block. I'm a sixteen-year homeowner  
13 in the town of Salina, and I'm also a candidate for  
14 legislator that would represent people in parts of  
15 Salina, Dewitt, Clay, and Cicero.

16 I think Micron could be a significant  
17 win for the area if the project is implemented with  
18 thought and care for the people and environment that  
19 already live here. I'm concerned that Micron has not  
20 shown that they will give back enough to our  
21 community. The country is experiencing a housing  
22 crisis and the building of above and market rate  
23 properties for employees moving to the area will only  
24 perpetuate this problem in greater Syracuse. I would  
25 want to know what exactly is Micron doing to create

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2 safe, affordable housing in the Syracuse area.

3 My other concern along the same vein  
4 is how many jobs will be created for the people in  
5 the community. I want to see a number of how many  
6 jobs at minimum will be created for people at the  
7 entry level or without higher education. These jobs  
8 will be necessary for fostering a good relationship  
9 with our community and for allowing many of our  
10 current residents to afford housing.

11 I'd also like to echo previous  
12 sentiments from this morning that I heard that Micron  
13 is putting the cart before the horse and buying up  
14 other available property before breaking ground. As  
15 someone who supports investing back into their  
16 community, these acquisitions decrease the  
17 availability of spaces that could be used to enrich  
18 our community in the next twenty years and in the  
19 more immediate future, rather than sitting dormant  
20 until more main Micron facilities are up and running.  
21 Thank you for your time.

22 MR. DAVIS: Thank you. Next is Andy  
23 Taddeo. If I could also ask the people silence their  
24 cell phones so it does not interrupt the speaker,  
25 that would be appreciative. After Andy will be Tom

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2 Lavi.

3 MR. TADDEO: Yeah, my name is Andy  
4 Taddeo. I live in Cicero, New York. I've been in  
5 Cicero for two-and-a-half years. I've already been  
6 impacted by this project because my previous address  
7 was Burnett Road in -- in Clay, which we love living  
8 there, so that was a -- a big -- big change for us.

9 I'm also talking about Emmanuel  
10 Lutheran Church, which is just recently celebrated  
11 our two hundred anniversary. We're about three-  
12 tenths of a mile from the Micron project, so we're  
13 worried about the impact that that's going to have on  
14 us.

15 One, is our church entrance is only  
16 about twenty-five feet from Route 31, so we're  
17 worried about the impact that that's going to have.  
18 That road is going to have to be widened. And what  
19 we'd like to have is, you know, some heads up when  
20 these things, you know let us know what's going to  
21 happen so we were able to prepare.

22 We have several things that the church  
23 we want to proceed with, but we can't make changes  
24 when we don't know what, even our future is going to  
25 be. We have several ministries that we do. We do

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2 them a monthly senior luncheon, and we do A.A.  
3 meetings once a week. We have the Kyle Schneider --  
4 Schneider Foundation, which helps veterans.  
5 Compassionate friends. We meet there once a month.  
6 I'm part of the Compassionate Friend Support Group,  
7 which is a support group for people who have lost  
8 their child or grandchild.

9 Are we going to be able to have those  
10 meetings if the, you know, the -- the construction is  
11 going to have major impacts on us? So, those are  
12 some of the things we're just concerned about. So,  
13 if you can take that into consideration, show some  
14 compassion and empathy for the -- the impact that's  
15 going to have on us, that would be greatly  
16 appreciated. Thank you.

17 MR. DAVIS: Thank you. Tom Lavi.  
18 After Tom will be Evelyn Ingram.

19 MR. LAW: I'm Tom Law, L-A-W.

20 MR. DAVIS: Well, then that might be a  
21 handwriting error or a reading error on my part. But  
22 let's go with Tom Law, L-A-W.

23 MR. LAW: Tom Law, Syracuse 140  
24 Mildred Ave, 13206. First comment is, this is, I --  
25 I can write a lot of notes and this is very, what you

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2 just say, tech -- technically clumsy for me not to  
3 have a place to set them down.

4 I would recommend that your -- your  
5 protocol for -- for the speakers be improved. I  
6 mean, these are normal setups, but podiums are also  
7 normal for an official speaker. So, I know you can't  
8 change this at the moment, but as you can see, I've  
9 got a few things here, and my time is precious as  
10 yours is. Okay?

11 So, first thing is an objection to  
12 your process. There are a few -- a few approaches to  
13 this, Mr. Petrovich and -- and our panel. One, I  
14 could complain about the size that it's too big, it's  
15 too small. I could complain about the considerations  
16 that the considerations we're not -- you might say  
17 heu -- heuristic. You know, broad enough and scaled  
18 and scoped properly.

19 Or I could complain about your method.  
20 That, what you're doing has questions and  
21 consequences, or limits to the consequences that are  
22 artificial, like the discharge permit. Is it going  
23 to actually pol -- re -- reflect a -- an incentive to  
24 polish the discharge water? That's my first major  
25 question.

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2 Is the technology to pretreat and then  
3 treat this discharge water, is it going to be  
4 adequate? Because from what I've heard, Onondaga  
5 County's wastewater people have been given a great  
6 plant, so to speak on Onondaga Lake, but if they're  
7 going to be responsible at some part for this  
8 treatment protocols or being a peer-review  
9 professional, I have no great confidence that this  
10 volume of water with corrosives and with metals,  
11 stray metals from layer depositions that we are up to  
12 ready for this.

13 Okay? That's a major question.  
14 Because in the public interest, is the water which we  
15 intake from Lake Ontario for drinking water, for this  
16 County is one of the main sources for drinking water.  
17 So, the effluent is going to go down to within maybe  
18 five, ten miles at the most of where --

19 MR. DAVIS: Ten seconds.

20 MR. LAW: -- the water drinking water  
21 comes in. Finally, wetlands don't get a lot of  
22 weight because we don't walk there. They haven't got  
23 a voice.

24 MR. DAVIS: Thank you.

25 MR. LAW: Yeah. And I'll be -- I'll

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 be adding written comments so I don't feel like  
3 cutoff is --

4 MR. DAVIS: As I said, you'll have  
5 another opportunity to speak. Next is Evelyn Ingram.  
6 After Evelyn will be, I think it is Leo Monostory?  
7 Monostory from Fayetteville, the C.N.Y. chapter. So  
8 Evelyn.

9 MS. INGRAM: Good afternoon. Evelyn  
10 Ingram, 7519 Oswego Road, Liverpool, New York. I  
11 serve as the regional spokesperson for Wegmans Food  
12 Markets, and I do not come here today alone. We have  
13 our executive store management team who was with us  
14 from our nine Central New York stores.

15 Jim Gosch is here with me, who serves  
16 as the store manager for our great northern location,  
17 which is in close proximity to the Micron site. And  
18 we are simply here today to share that we recognize  
19 the challenges and things that sometime may come with  
20 a business of project of this nature.

21 But Wegmans is in support of this  
22 initiative, recognizing the possibilities it has for  
23 our area, as well as the impact it will have on our  
24 community. We also have a very strong value system  
25 related to community service and community

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2 opportunity, and we are here in partnership with  
3 Micron to recognize that we want to do all we can to  
4 support our community and hope that this project will  
5 continue in the matter as it has -- in the matter as  
6 it has been.

7 MR. DAVIS: Thank you. Did I get the  
8 first name correct?

9 MR. MONOSTORY: It's Les Monostory.

10 MR. DAVIS: Okay. After Les will be  
11 David Bottar.

12 MR. MONOSTORY: I'm the Vice President  
13 of the Central New York Chapter of the Izaak Walton  
14 League of America, a national conservation  
15 organization, and President of the League's New York  
16 State Division, and also a member of the League's --  
17 well, we have a Green Lakes committee, I'm the New  
18 York State representative on that committee. I  
19 worked for the County of Onondaga, both as an  
20 environmental planner and for the county health  
21 department for thirty some years.

22 Most of my experience is with the  
23 cleanup of Onondaga Lake, which was a thirty-year  
24 process. I actually am the author of a short history  
25 of the Onondaga Lake reclamation, basically covering

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 the period of 1960s to 2020.

3 And the reason I bring up Onondaga  
4 Lake is because it was a process started with Senator  
5 Patrick Moynihan in the late '80s. And it created  
6 the Onondaga Lake management conference and that  
7 turned into the Onondaga Lake Partnership.

8 And my main point here in talking  
9 about the Micron project is that I would like to see  
10 a process for the Micron project that would  
11 incorporate a partnership similar to what we had with  
12 the Onondaga Lake cleanup, covering about three  
13 decades.

14 And we could call this the Micron  
15 partnership, or perhaps a Micron community  
16 partnership. But you know, we have a very short  
17 period here to comment on a twenty-thousand-page  
18 report.

19 What we need is continued public  
20 involvement and also communication with the federal,  
21 state, and county agencies that are involved with  
22 this Micron project. And so, my main point is not so  
23 much to comment or criticize the Micron D.E.I.S., but  
24 to recommend that the public be involved with this  
25 project over to period of, we don't know how many

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 years. And we also need information from the  
3 federal, state, and county agencies --

4 MR. DAVIS: Ten seconds, Mr. Les.

5 MR. MONOSTORY: -- that are going to  
6 be involved here. We were fortunate with the  
7 Onondaga Lake cleanup that we could hear from these  
8 agencies. Today, that is more limited than it was at  
9 that time. Thank you.

10 MR. DAVIS: Thank you. Next is David.  
11 After David is Terry King.

12 MR. BOTTAR: Good afternoon. My name  
13 is David Bottar, and I'm the Executive Director of  
14 the Central New York Regional Planning and  
15 Development Board. We're a -- we're a public  
16 planning agency formed by our five member counties  
17 here in Central New York back in 1966. So, we've  
18 been involved in this community for many years.

19 Besides being Director of the Regional  
20 Planning Board, I'm -- I'm also a life resident of  
21 Central New York. And it couldn't please me more to  
22 know that Micron has chosen our community to be the  
23 host community for their one hundred-billion-dollar  
24 investment. Think about it. One of the largest and  
25 most successful semiconductor companies in the world

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 has chosen to come to Central New York.

3 We know a company like this must  
4 complete their own due diligence before making a  
5 decision to invest such a large amount of money, in  
6 one project, in one community. Micron has evaluated  
7 our community, and concluded we have the capacity to  
8 host this project. We have the infrastructure, the  
9 people, the education, resources, healthcare, public  
10 safety, environmental resources, and public  
11 commitment to make this project a success. This is  
12 clearly addressed in the Draft D.E.I.S.

13 In evaluating this project, is as  
14 important to note, it's consistent with comprehensive  
15 plans, which have been completed in recent years by  
16 several counties in Central New York.

17 The project is also consistent with a  
18 plan, the regional planning board adopted in 2013.  
19 One of the major goals incorporated in this plan is  
20 to support the growth of a diverse economic base that  
21 will provide employment opportunities for a broad  
22 cross section of citizens across the five county  
23 region, increase the region's population from seven  
24 hundred and ninety-one thousand residents to a  
25 million residents, and increase the number of jobs

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 from three hundred and twenty thousand to over four  
3 hundred thousand by 2050. Who would've ever thought  
4 when we adopted these goals that we would have a  
5 chance to realize them in our lifetime, or at least  
6 our children's lifetime?

7 Based on the strong citizen  
8 involvement in preparing these plans, I'm not  
9 surprised that communities across Central New York  
10 have embraced this project. County-based Micron  
11 strategic planning committees have been a forum  
12 across Central New York. Towns and villages are  
13 updating their comprehensive plans or completing  
14 their first comprehensive plan ever to ensure that  
15 they're positioned to support and capitalize on the  
16 opportunities presented by Micron.

17 Major infrastructure improvements are  
18 being planned and implemented to ensure we meet the  
19 needs of the Micron project and the community at  
20 large. Our higher education institutions, and K  
21 through schools -- K through twelve schools have  
22 stepped --

23 MR. DAVIS: Ten seconds.

24 MR. BOTTAR: -- and healthcare  
25 organizations are moving forward with significant

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 expansion of their facilities. We were very  
3 fortunate that early in the process, the Town of Clay  
4 and Cicero supported this project, and we're  
5 fortunate that the entire -- entire region has  
6 stepped up to move it forward. Thank you.

7 MR. DAVIS: Thank you. Terry King,  
8 followed by Matthew Tarolli. Is there a Terry?  
9 Coming down the front, okay. No Terry? Okay. How  
10 about Matthew?

11 MR. TAROLLI: Good afternoon. My name  
12 is Matthew Tarolli. I live in Syracuse, New York,  
13 and I represent Onondaga and Cortland-Madison BOCES.  
14 O.C.M. BOCES has been at the forefront of providing  
15 meaningful educational opportunities to youth and  
16 adults for over fifty years.

17 This region has never seen the  
18 opportunity for advancement in educational capital  
19 and regional growth. We see the opportunity to work  
20 with community agencies, educational providers, and  
21 industry leaders and an opportunity for our regional  
22 population to prosper.

23 Micron has been a fantastic partner  
24 over the last couple of years, is they've taken the  
25 time to communicate with us at O.C.M. BOCES about

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 their needs for the region when it comes to workforce  
3 development. It is encouraging to work with a  
4 partner that is willing to be a learner and to help  
5 us know the skills needed to help workers have what  
6 they need know to be successful. Thank you for your  
7 time.

8 MR. DAVIS: Thank you. Next speaker  
9 will be Alice Dove, followed by Joss Willsbrough.

10 MR. DOVE: Hello, my name is Alice  
11 Dove, like the bird, soap and chocolate. I'm here  
12 because of SustainCNY's mission to ensure Micron's  
13 presence in New York happens with the smallest  
14 negative impact as possible and the greatest positive  
15 impact.

16 I live in Syracuse, I work in  
17 Syracuse. I was just recently let go from T.C.G.  
18 Player when eBay decided to close down our  
19 authentication center outside of the Syracuse  
20 Galleries with an announcement that was so short it  
21 triggered the WARN Act.

22 The reason why I mentioned that is  
23 with the impact -- with the experience that the hands  
24 of a large corporation in mind, we need to review  
25 dates. We need the review date to be extended from

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 forty-five days to a hundred and twenty days.

3 The document is twenty thousand pages  
4 long. A month and a half is barely enough time to  
5 assess what's in there, much less process and respond  
6 in a holistic sense. The decision made on this will  
7 impact not just your life, but the lives of children  
8 and your children's children.

9 Another seventy-five days is nothing  
10 in contrast to that, or even the scope of this  
11 project's intended timetable. We need to guarantee  
12 that Micron will be equitable in their hiring  
13 practices that must take place locally. I'm not even  
14 being an altruist here. I want to work in Micron.  
15 I'm interested in semiconductors, but that barrier's  
16 going to be significantly harder if Micron isn't  
17 interested in hiring people that live here and people  
18 that are in disadvantaged communities.

19 We need Micron to commit to renewable  
20 energy. Our energy grid here is already looking at  
21 an oncoming struggle. Electric bills are already  
22 high. The draw of these plants have -- will be the  
23 equivalent of states. States.

24 That's going to have a noticeable  
25 impact on the prices public consumers pay. They have

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2 to ease that burden through renewable resources of --  
3 and renewable sources of energy and buy an agreement  
4 to subsidize energy costs.

5           Lastly, I will reiterate that I live  
6 in Syracuse, I'm extremely nervous about the effects  
7 that this will have on the cost of living around  
8 here. It's so hard to find affordable places to  
9 rent, and this relocation for thousands of workers is  
10 going to squeeze that even more.

11           Micron has to ensure that they operate  
12 with care in regards to facilitating transportation  
13 to the plant for citizens of C.N.Y. that live beyond  
14 Clay. And they absolutely need to back housing  
15 growth to alleviate the burdens they're going to  
16 generate. Thank you for your time.

17           MR. DAVIS: Thank you. Next is Joss,  
18 followed by Merike Treier.

19           MR. WILLSBROUGH: My name is Joss  
20 Willsbrough. I'm a Syracuse City resident and a grad  
21 student at Syracuse University who is speaking in  
22 unanimous support of the recommendations outlined by  
23 SustainCNY, Neighbors of the Onondaga Nation, NYCLU  
24 and Jobs to Move America, including their legitimate  
25 request for a community benefits agreement.

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2 I begin with a demand to extend the  
3 current common period from forty-five days to a  
4 hundred and twenty days and to organize additional  
5 public hearings like this in multiple locations, the  
6 D.E.I.S. is a twenty-thousand-page document; forty-  
7 five days is woefully insufficient to allow time for  
8 a public response.

9 As a federally subsidized project, the  
10 recommendations of Sustain CNY reflect the minimum  
11 standards for equitable quality of life protections  
12 for the community impacts of Microns development in  
13 Central New York. And it addressed urgent and  
14 salient concerns about the environmental,  
15 socioeconomic health and safety harms of Micron.

16 Some specific concerns. Micron must  
17 create a comprehensive plan to generate or purchase  
18 new renewable energy using wind, solar, and grid and  
19 storage infrastructure without relying on the  
20 purchase of renewable energy credits.

21 Micron must ensure that their  
22 mitigation plan adequately replaces the valuable  
23 wetlands habitat, watershed and habitat for multiple  
24 endangered species that the project will destroy.

25 Micron must create a workforce development process

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2 focused on census tracks with the highest  
3 concentration of poverty in the C.N.Y. region. With  
4 hiring processes and programs that are free of access  
5 barriers, such as G.E.D. requirements, English  
6 language proficiency requirements, and discrimination  
7 against workers who are impacted by the criminal  
8 legal system.

9 And Micron must prioritize a  
10 cooperative effort with state and county government  
11 agencies to expand the availability of mixed income,  
12 affordable climate-friendly, and safe housing. Thank  
13 you.

14 MR. DAVIS: Thank you. Merike,  
15 followed by Louise Hotaling.

16 MS. TREIER: Hello, I'm Merike Treier,  
17 the Executive Director of the Downtown Committee of  
18 Syracuse, located in Syracuse, New York. And I'd  
19 like to thank Micron for their investments, their  
20 community partnerships, and their engagement to date.

21 For fifty years, our organization has  
22 focused on the revitalization of Downtown Syracuse.  
23 I've been fortunate to be part of this activity for  
24 the last twenty years. And over this time we have  
25 worked with many partners and stakeholders to adapt

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2 to changes around us, lay the groundwork and build a  
3 vibrant downtown center that attracts businesses,  
4 employees, residents, and visitors through the  
5 experiences and opportunities offered.

6 This revitalized Downtown and  
7 transformation story of Syracuse helped attract  
8 Micron to Central New York, and now the growth is  
9 going to be accelerated.

10 Like an ecosystem that fuels itself,  
11 the growth that comes with Microns investment in our  
12 community will now help us to continue to create a  
13 more vibrant downtown Syracuse for our entire region.  
14 Thank you.

15 MR. DAVIS: Thank you. Louise  
16 Hotaling, followed by Anthony Tubolino.

17 MS. HOTALING: Hi, my name's Louise  
18 Hotaling. I live in the Town of Clay. I'm right  
19 next to the Micron facility. My concern is the  
20 watershed that's going to come off of this project.

21 The few houses that are along that  
22 road within a quarter mile there will not even be  
23 able to use their septic systems any longer, because  
24 the water has to go somewhere. Where they took the  
25 test and they did the water testing down by where the

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2 railroad tracks were, they did it on a very dry  
3 summer. Any other time you go down there, you could  
4 have water up to your knees. Thirty-five years I've  
5 witnessed this. And then, we've had where the sewer  
6 system has gone into Oneida River recently.

7 Now, when you add a project this large  
8 with extra people, how can we ensure that we're not  
9 going to totally ruin our waterways? And we had  
10 problems with Onondaga Lake. Are we going to turn  
11 Oneida into the same thing?

12 We're promised many jobs, but how  
13 many? And we're -- we're -- they're dangling a  
14 golden chain in front of us. But at what cost? How  
15 many of us has looked at other Micron facilities and  
16 how the people live after they were there? Is this  
17 going to be another one where they're there for a few  
18 years and then they leave after the tax dodge wears  
19 out?

20 Also, the fact that too many people  
21 don't pay attention to the environment. And we are  
22 blessed to have water in this area. But if we ruin  
23 it, there's no bringing it back. We need to be  
24 assured that Micron will take the responsibility of  
25 cleaning up any waste and spills that they produce.

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2 It's hard to imagine that our kids  
3 drink water that could be polluted. And what about  
4 all the work that's going to be done? Us people that  
5 live next to that, are we supposed to listen to  
6 construction twenty-four seven? It's nice if you  
7 live in the city and you don't have to deal with it.  
8 But if you're right next door to it, trust me, it  
9 won't be pleasant.

10 The other thing that we have to take  
11 into consideration that we don't currently have  
12 enough medical personnel, schools large enough to  
13 handle this amount of project. So, we need to take a  
14 close look at what we're really agreeing to, and we  
15 need more time. More time for the people to actually  
16 read all those pages and be able to comment. This  
17 has been pushed out for this, to get the reports.  
18 But now it's pushed on us to hurry and make a  
19 decision. This isn't fair.

20 We need this time to really study  
21 what's going to happen and ask for Micron to really  
22 commit to keeping this environment that we've been  
23 blessed to have clean. And we're going to -- the  
24 ones that are living right next to it, we're going to  
25 breathe all that stuff that your plant is going to

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2 do.

3 So, I'm at the end of my life mainly.  
4 But what about the kids and that, that live close to  
5 that facility?

6 MR. DAVIS: Ten seconds.

7 MS. HOTALING: What will they be  
8 breathing? Think about this when you're so gung ho  
9 for Micron.

10 MR. DAVIS: Thank you. Next is  
11 Anthony, followed by Robert Lasko -- Laskowski.

12 MR. TUBOLINO: Good afternoon. I want  
13 to thank you for allowing me this opportunity to go  
14 on record. Hello, my name is Anthony Tubolino. I --  
15 I am a twenty-seven year member of the Operating  
16 Engineer's Local 158 out of the Syracuse, New York  
17 office.

18 I'm a business representative in the  
19 Local. We represent four thousand members in New  
20 York State. Our members operate heavy equipment on  
21 projects such as this. The project will help employ  
22 our members for many years to come, will not only be  
23 a job but a career builder for many years for our  
24 members.

25 It'll give a pathway to many of the

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2 trades to bring in new generations of members through  
3 apprenticeships, which offer great wages and  
4 benefits. It will give the surrounding areas a place  
5 for them to have careers and not leave the area. The  
6 project will build up the middle class.

7 Additionally, I am the Vice President  
8 of the Jefferson Lewis and St. Lawrence County  
9 Central Trades and Labor Council, A.F.L.C.I.O.O. Our  
10 council represents union workers from across the  
11 diversified fields, from aluminum workers to nurses,  
12 teachers, firefighters in the building trades over  
13 ninety-three hundred strong in the three counties.

14 We support Micron and the  
15 opportunities that it'll bring not only to Clay, but  
16 also the surrounding areas for growth and job  
17 creation. Thank you for my time.

18 MR. DAVIS: Thank you. Robert  
19 Laskowski, followed by Steven Koegel. Robert? Okay,  
20 Steven.

21 MR. KOEGEL: Good afternoon. My  
22 name's Steven Koegel, I'm the Vice President of  
23 Business Communications with Centro. Centro supports  
24 all projects that foster economic development and  
25 provide employment opportunities that help

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2 individuals better their lives.

3 And to fulfill our mission, to help  
4 move communities forward, our intent is to provide  
5 transportation services, bringing individuals to  
6 Micron and surrounding support businesses once  
7 operations at the site begin. Thank you.

8 MR. DAVIS: Thank you. Roggie Drew,  
9 followed by Jim Nistico.

10 MR. DREW: Good afternoon. Could I  
11 have a one minute warning instead of a ten second  
12 warning?

13 MR. DAVIS: Absolutely.

14 MR. DREW: Thank you so much. My name  
15 is Roggie Drew. I'm a Syracuse City resident. I'm  
16 glad to be here today and I'm glad to be a resident  
17 here on Onondaga Nation lands, where we are all  
18 speaking from. I'm speaking, I -- I was listening  
19 the beginning and hearing the representative from the  
20 Army Corps of Engineers said that your role is not to  
21 be for or against, but responsible to determine if  
22 it's the best interest of the public.

23 And, you know, the question that comes  
24 to mind is how do we determine that? How is -- what  
25 -- what is determined the best interest of the public

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2 when we're talking about, someone mentions five  
3 million gallons per day just for cooling, loss of  
4 hundreds of acres of wetland?

5 There's no replacing a wetland that  
6 has developed over millions of years. That's lost  
7 forever. When we're discussing increased cost of  
8 housing --

9 UNIDENTIFIED SPEAKER: I'll hold that  
10 for you -

11 MR. DREW: I'm still going to hold it,  
12 but I appreciate you. Increased cost of housing.  
13 When we're talking about PFAS chemicals, forever  
14 chemicals that we -- I'm sure so many folks here have  
15 -- have experienced with cancer.

16 When there's so many places in this  
17 region from past development that -- that are cancer  
18 hotspots. That's what we're talking about, forever  
19 Chemicals. So, when we're -- when we're in this  
20 question of the best interest of the public, how is  
21 that determined? What is weighed, is -- is economic  
22 benefit weighed above these things? Irreplaceable  
23 lands, irreplaceable waterways, irreplaceable the  
24 health of our communities?

25 And I -- I want to say that I do

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2 support this -- this hearing. And this is a twenty  
3 thousand page document. I also support this -- ask  
4 for more time. And that seems like a very reasonable  
5 request. I didn't look at the document at all. I  
6 looked at some summaries. I looked at Syracuse.com  
7 article, Twenty thousand pages? I -- I will never  
8 read it.

9 But certainly for folks that have that  
10 time and ability, there needs to be more time  
11 allotted for that. There needs to be an extension of  
12 public hearings in multiple locations. I've heard  
13 this request for hundred and twenty days. I support  
14 that as well.

15 MR. DAVIS: One minute.

16 MR. DREW: Thank you so much. And I -  
17 - yeah. I think -- I think I just want to end with  
18 that question. What -- that -- that we are clear  
19 about. To me, public -- public benefit with these  
20 questions of how many jobs are created?

21 These -- these are critical questions.  
22 These are the questions, right? These aren't --  
23 these aren't the side notes. So, when -- when -- if  
24 -- if this is being taken seriously, and these --  
25 this hearing means anything, I hope that these things

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2 are weighed very seriously, and that the bent, the  
3 desire of a multi-billion dollar corporation --  
4 corporation is not put -- put above the people here.  
5 I don't believe Micron has these -- these people --  
6 any of our interests in mind, number one. Micron has  
7 an interest in creating facility to make a product to  
8 sell.

9                   You all are responsible to consider  
10 everyone else's concerns here, and I hope that that  
11 is taken seriously. Thank you.

12                   MR. DAVIS: Thank you. Jim Nistico,  
13 followed by Steve Fournier.

14                   MR. NISTICO: Hi, my name is Jim  
15 Nistico, and I am a resident and a business owner in  
16 the Town of Clay. In fact, my residence is about a  
17 quarter mile from the Micron facility. And I here --  
18 I'm here to strongly support Micron.

19                   First of all, for the economic  
20 development and for the opportunity that Syracuse has  
21 not had for fifty years. Back when manufacturing was  
22 king here in Central New York, Syracuse was a fast  
23 growing metropolitan area, and that has since slowed  
24 down from 1970 to the year 2020, there has only been  
25 a three percent population growth, while all other

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2 areas in the country have grown more substantially.  
3 Thus, limiting the opportunity and economic  
4 availability in our area.

5 As a business owner, I look forward  
6 to, you know, working with Micron on various  
7 projects. And I know many of my fellow business  
8 owners in the area do as well. This is a real  
9 transformational project that a lot of people here in  
10 Central New York have been waiting for for a long,  
11 long time.

12 I do hear a lot of concerns about the  
13 environment. This nearly three-year process shows  
14 that there has been some diligence taken to make sure  
15 and ensure that there is the least -- the least  
16 damaging effects to the environment that a chip fab  
17 can do.

18 Especially for -- this is an immense  
19 project, one of the largest projects in the United  
20 States. Micron is a steward of the environment.  
21 There is an executive April Arnzen who lives in  
22 Boise. I guess she lives close enough to siphon a  
23 Wi-Fi from the Micron facility in Boise and doesn't  
24 seem to bother her, as far as the environmental  
25 thing.

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2 But anyways, I'm here to support  
3 Micron and I look forward to seeing this project move  
4 forward. Thank you very much.

5 MR. DAVIS: Thank you. Okay. Steve  
6 Fournier, followed by Sydni Barnett.

7 MR. FOURNIER: Good afternoon. I'm  
8 Steve Fournier, I'm the Market President for KeyBank  
9 here in Central New York, a lifelong resident of  
10 Central New York, and I'm thrilled to have an  
11 opportunity to speak to you, with you today.

12 I'm here as -- as well to support the  
13 Micron project, the progress they've made today but a  
14 little bit more context. As -- as a resident and --  
15 and with one organization for just about forty years,  
16 I had the opportunity to move several times to the  
17 Midwest and to the far west.

18 I chose to keep my family here for the  
19 quality of life. And for all this area has afforded,  
20 hasn't been without its challenges, but I truly  
21 believe there's a lot of resources that avail us here  
22 in Central New York.

23 The pros -- first of all, the -- the  
24 good work that this DEIS study has done over the  
25 course of the last couple years and where it's

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2 brought us to today, I -- I think it's the last  
3 speaker spoke to, it -- it -- I think it's -- it  
4 proves that, you know, this is the right place in the  
5 right time.

6 I -- I will also tell you that some of  
7 the things that Micron is looking to invest, close to  
8 a half a billion dollars in -- in various community  
9 projects, really augments some of the work that we're  
10 trying to undertake between affordable housing,  
11 standing up our neighborhoods and workforce  
12 development, and that is a sweet spot for us.

13 And what we've done over the last  
14 several years, since 2022 we've invested close to  
15 two-and-a-half million dollars into these three  
16 pillars of our foundation. And we need more help.  
17 We need more help, not just from the community we  
18 have but other outside sources to the -- to the  
19 community.

20 And -- and Micron has made that  
21 commitment, so, thrilled at the prospect of them  
22 helping augment some of the work that we're doing in  
23 -- in the community and what we're trying to do going  
24 forward.

25 The other thing I will share with you

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2 since the announcement is how well this business  
3 community here. I have a chance to work across the  
4 state, between Buffalo and Albany. And I can see  
5 firsthand how the both, the banking community and  
6 other aspects of this community has come together  
7 particularly in the financial services community.

8 You know, I've never in my forty years  
9 seen how we've tried to coalesce and solve some of  
10 the problems, or I should say, good problems that we  
11 might have as a result of what it's going to have.  
12 So, thank you for the opportunity to speak to you  
13 today. Thank you.

14 MR. DAVIS: Thank you.

15 MR. FOURNIER: Yeah.

16 MR. DAVIS: Next is Sydni, followed by  
17 Cal Robinson.

18 MS. BARNETT: Hello. My name is  
19 Sydni. I've lived in Cicero my whole life and  
20 recently moved to Syracuse. And I'm here to voice my  
21 concern over the environmental impact of this  
22 project. It's been said that the impact statement is  
23 twenty thousand pages long, so obviously it's an  
24 immense document. We kind of need more time to  
25 review it as a -- as a community. So, I'm here to

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2 support the one-hundred-and-twenty-day extension for  
3 -- for public comment.

4 I'm concerned over the environmental  
5 impacts of this project because it's been said that  
6 it will essentially double the water usage of  
7 Syracuse. The project will use the same amount of  
8 water as the entire City of Syracuse in one day, like  
9 each day that the facility is functioning. I'm very  
10 concerned over that because right now this region is  
11 rich in water. We know that's why Micron has been  
12 attracted to this region for its abundance of water.

13 But if the water usage of this  
14 facility will jeopardize that and deplete our waters,  
15 I think that's something we should be very watchful  
16 and concerned over. I'm also concerned over the use  
17 of PFAS chemicals in the microchip fabrication  
18 process. PFAS are forever chemicals that can fluid  
19 our waterways and subject us to health impacts over  
20 long periods of time.

21 I'm also concerned over the loss of  
22 wetlands, which are a habitat for many endangered  
23 species. So, the environmental impacts of this  
24 project are very concerning. And I know there is  
25 economic benefits to this project, but as has been

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2 said, I think, when determining what's best for a  
3 community, we should also consider the health impacts  
4 and environmental impacts over the long-term for our  
5 community. Thank you.

6 MR. DAVIS: Thank you. Next, Cal  
7 Robinson followed by Timothy Riina-Ferrie.

8 MR. ROBINSON: Good afternoon. My  
9 name is Cal Robinson. I'm a biology teacher and a  
10 resident of Liverpool, New York. I come with some  
11 concerns particularly about the environmental impact  
12 of this project as well as some of the economic  
13 claims that are being made.

14 Notably, this wetland that is going to  
15 be built upon, hosts populations of the Indiana bat  
16 and the northern long-eared bat. The Indiana bat has  
17 already lost fifty percent of its population since  
18 being listed on the endangered species list, and  
19 we're taking out a massive part of their habitat.

20 If this site is developed, Micron will  
21 be required to either build or set aside in new  
22 wetlands. Even if that occurs, that does not erase  
23 the fact that two hundred acres of wetland are going  
24 to be eliminated. And any new wetland that's set  
25 aside or that is created is not going to host the

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2 exact same community of species that this currently  
3 existing wetland does. Additionally, wetlands serve  
4 as a filter for pollutants and runoff.

5 The construction of a large facility  
6 such as that proposed by Micron is going to produce  
7 absolutely massive amounts of pollutants including  
8 PFAS, and there will be wet -- less wetland available  
9 to filter these pollutants. And that is one of the  
10 main jobs that wetlands do for us is they filter  
11 pollutants out of the environment.

12 Another key aspect of being a resident  
13 of Central New York is our large access to fresh  
14 water. As climate change persists, this is a very  
15 important resource. Micron may use, as the previous  
16 speaker mentioned, as much or more water per day than  
17 the entire City of Syracuse already does. Why do we  
18 want to allow a multi-billion-dollar company to have  
19 access to that water versus the residents of this  
20 area, when individuals and families need it?

21 On the topic of job creation, I want  
22 to know how many actual long-term jobs are going to  
23 be created by this. I know there's going to be a lot  
24 of construction jobs, which is excellent for that,  
25 that community, that industry. But after the

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2 construction is done, what jobs are going to be left?  
3 How many of the jobs in the facilities are going to  
4 be left for actual working employees versus  
5 automation and artificial intelligence performing a  
6 lot of the manufacturing?

7 Of those jobs that are there for  
8 people, what kind of educational requirements will  
9 they be? Are they going to require master's degrees,  
10 college degrees, vocational school? What about the  
11 people who can't afford that kind of debt that might  
12 be brought upon them -- brought upon them, excuse me,  
13 by that kind of requirement.

14 I'm also aware that there's going to  
15 be housing constructed along with the creation of  
16 this facility. These houses, are they going to be  
17 affordable for people who live in this area? Or are  
18 they just going to be cookie cutter, very large,  
19 several hundred-thousand-dollar houses that actual  
20 normal working people can't afford?

21 As a final statement, if Micron is  
22 allowed to build this -- over these wetlands, it's  
23 going to serve as an indication that endangered  
24 species and wetlands don't matter, water security  
25 doesn't matter, and money is always the priority.

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2 Thank you.

3 MR. DAVIS: Thank you. Timothy  
4 followed by Trent Gardner.

5 MR. RIINA-RERRIE: Hello. My name is  
6 Timothy. I'm a resident of Syracuse, New York. I've  
7 been for a long time. I'd just like to say that,  
8 it's -- Micron is a very exciting thing for us, I  
9 believe. I think everyone in Syracuse is very  
10 hungry.

11 We understand what this community has  
12 been through, how Carrier just left and left us  
13 essentially destitute. And how essentially large  
14 corporations come in, take our resources and then  
15 leave because they can. And we are left.

16 I guess, my worry is that -- I'm  
17 excited for Micron. I'm excited for economic  
18 development. This is an environmental impact  
19 statement. And the environmental impact of that  
20 Micron has the ability to unleash on the future  
21 generations of people all across New York State is  
22 absolutely astronomical. And they can always just  
23 leave.

24 Like, some of the previous speakers  
25 said, water is going to become more and more

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2 important as the years go by. We're extremely lucky  
3 to have such access to fresh water. And it's  
4 worrying that a plant like this could potentially  
5 ruin that groundwater, ruin that aquifer.

6 I'd also like to admonish, honestly,  
7 the County for putting this together in such a  
8 haphazard way. The twenty-thousand-page document  
9 that is meant to be for community outreach should  
10 also have supplementary documents.

11 You could have interviews. You could  
12 even have A.I. summarize parts of it and release that  
13 to the public after it's been vetted for accuracy. I  
14 mean, there are tools that could have been done to  
15 make this outreach actual outreach instead of just  
16 what seems like a hand wave to say, well, we did  
17 something forty-five days, twenty thousand pages, one  
18 day of public hearings.

19 I'd also like to point out that Micron  
20 is here for our resources. As some of the small  
21 business owners have pointed out, people all over  
22 Syracuse, small business owners, larger business  
23 owners, people who are interested in the community  
24 have done tremendous work to get to where we are  
25 today.

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2 It has not been easy after large  
3 manufacturing left. And I just like to point out  
4 that, I just like to be wary of Micron that they are  
5 just abusing these resources. They're going to take  
6 these communities, these channels that have been so  
7 purposely created, use them for their own purposes  
8 and essentially bleed the place dry.

9 And what if they're successful, are  
10 they going to build another plant? In the  
11 introduction of the proposal, the impact statement, I  
12 saw that it's a twenty-year plan. Twenty years is  
13 not a very long time to reassess something. And when  
14 they do reassess --

15 MR. DAVIS: Ten seconds.

16 MR. RIINA-FERRIE: And I would also  
17 just like -- oh, excuse me. I apologize. And I'd  
18 just like to say that the environment affects people,  
19 not just plants and animals that they pave over.

20 MR. DAVIS: Thank you. Trent Gardner  
21 followed by Warren Hilton.

22 MR. GARDNER: Good afternoon. I would  
23 like to also reiterate the hundred-twenty day comment  
24 period. I feel that the document is a little too  
25 extensive for the average person to be able to

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2 consume in the forty-five day period.

3 I would also like to highlight the  
4 socio-economic impacts that the proposed Micron  
5 facility would have. We already have a shortage of  
6 teachers, specifically in -- oh, specifically in  
7 special education for young kids. There is a  
8 shortage of available resources for these students,  
9 and I know many families are fighting and -- and  
10 competing for these resources for their children to  
11 get the services they need.

12 This is also reiterated in the health  
13 care systems, where mental health services and  
14 addiction services are understaffed. I know serve --  
15 several facilities have way more patients than is  
16 what they should be what is advised per therapist and  
17 per counselor.

18 The affordable housing, you're --  
19 we're already kind of hitting a bubble, where many  
20 housing developments have already shot up in value  
21 just because of the talks of Micron coming in. And  
22 then, when the plan is actually implemented, we're  
23 talking about all of these houses skyrocketing in  
24 value with first time homebuyers being  
25 disproportionately disadvantaged.

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2 We also talk about the rental  
3 properties that are available in Syracuse where  
4 there's -- it's hard to find for the average person  
5 an affordable apartment, affordable house to start a  
6 family. So, I know many young people are starting to  
7 delay having families as a way to save money, as a  
8 potential of buying a house or potential of getting  
9 into a neighborhood or potential of getting into a  
10 school that they want to go to.

11 Additionally, a lot of local areas are  
12 announcing budget cuts right now, which doesn't  
13 install much confidence in this plant coming into  
14 this area. With Mayor Walsh announcing over ten  
15 million dollars in budget cuts for 2026, how can we  
16 feel confident that a private company is going to  
17 come in, take some resources while all the rest of us  
18 are, we're fearful. We're afraid.

19 Additionally, all these services that  
20 are available to the public are already  
21 disadvantaged. With the burst of population, with  
22 the burst of economics coming into Syracuse --

23 MR. DAVIS: Ten seconds.

24 MR. GARDNER: -- how can the local  
25 people feel more confident that they are going to

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 receive the services that are already disadvantaged  
3 against them? Thank you.

4 MR. DAVIS: Thank you. Warren Hilton.

5 DR. HILTON: Good afternoon. Thank  
6 you. My name is Dr. Warren Hilton. I'm honored to  
7 be the President of Onondaga Community College.  
8 Thank you for hosting this forum, giving me the  
9 opportunity to speak.

10 I want to briefly tell you about our  
11 experience at Onondaga Community College with Micron  
12 Technology and how it is changing lives of the  
13 students of all ages at Onondaga Community College.

14 For the last three years, Micron has  
15 been a tremendous partner in education with us at  
16 O.C.C. Micron has given us the equipment, valued at  
17 five million dollars to help us outfit and build the  
18 Micron Clean Room Simulation Laboratory on our  
19 campus.

20 That gift was matched by Onondaga  
21 County and the State of New York. And Micron also  
22 committed an additional two point five million mainly  
23 for scholarships for students and others to -- other  
24 support to train technicians, most of which will work  
25 at companies locally, not just at Micron.

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2 The lab will open this coming fall.

3 And I hope each of you will have the opportunity to  
4 experience it, because it'll be a wonderful  
5 opportunity. Along with the funding that Micron has  
6 provided for us for the Clean Room and scholarships  
7 as I just described, Micron verified our academic  
8 curriculum before we began to offer it to ensure that  
9 it would lead to sustaining wage jobs in the semi-  
10 conductor industry.

11 We welcomed our first students in our  
12 Electromechanical Technology program in the fall of  
13 2023. This past May, several of them graduated and  
14 were the first to complete that degree. Five of  
15 those individuals are -- are currently working for  
16 Micron Technology in Boise. You may know one of  
17 them. One of them is R.J. Tinsley. R.J. graduated  
18 from Liverpool High School, where we're sitting.

19 In 2017, he earned an associate's  
20 degree at O.C.C., then went on to get a bachelor's  
21 degree at SUNY Cortland. He struggled to find a job  
22 after his bachelor's degree. And he was delivering  
23 food for local establishment. He found his way to  
24 O.C.C. for our Electromechanical degree and the rest  
25 is history, R.J. will be -- has started his career

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2 working for Micron in Boise.

3 After the -- his first year with us,  
4 he actually had a paid internship with ten other  
5 O.C.C. students. We have experienced tremendous  
6 growth in that program and -- and we are thankful  
7 that we're able to have it.

8 In the years since we started the  
9 program, our educate -- our education efforts have  
10 continued. We've hosted Micron Chip Camp. We've  
11 also hosted teachers from the area who are learning  
12 our curriculum. And we have over four hundred  
13 students in high school school who are taking this  
14 curriculum.

15 MR. DAVIS: Ten seconds.

16 MR. HILTON: So, as you can see from  
17 all of that, Micron has been an exceptional partner  
18 for us to work with. It is a partner that I believe  
19 should enjoy the support for their construction  
20 project. Thank you.

21 MR. DAVIS: Thank you. Those are the  
22 cards that I have for all new speakers that did not  
23 speak at a previous session. I have one card from a  
24 speaker who spoke earlier, which I will ask to come  
25 up. And then, I will open it up to anybody that has

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 not spoken and would like to speak. So, Greg  
3 Lancette, please, you're up next.

4 MR. LANCETTE: Thank you. My name is  
5 Greg Lancette. I am a resident of Clay, and I grew  
6 up in the City of Syracuse, student of Syracuse City  
7 School District. I'm here to talk and give comment  
8 on that, of course, in support of Micron and the  
9 project.

10 But I'm going to give a brief summary  
11 on a Syracuse Build Pathways to Apprenticeship  
12 Program that is underway. It's a multi-year program.  
13 When I first met Micron and started talking about our  
14 job opportunity program, they were very interested to  
15 hear some of the details.

16 They were very quick to ask if it was  
17 a theory or a program or if it was actually up and  
18 running. And fortunate for us, the program was a  
19 couple of years old that had already graduated four  
20 cohorts. And the program is designed for underserved  
21 communities, non-traditional construction workers,  
22 and it provides a basic skill set that makes  
23 residents of our community that have been typically  
24 overlooked prepared for a career in construction.  
25 They are taught curriculum that is NABTU, North

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 America Building Trades Union, multi-core craft  
3 curriculum, and they are given preparatory skills.  
4 And many of the graduates are currently apprentices  
5 in building trades local unions. And they are going  
6 through their pres -- progressions.

7 The original design of the program was  
8 built for the upcoming replacement of Interstate 81,  
9 and the proof is then in the pudding and the data and  
10 Micron has agreed to support that both intellectually  
11 and even financially, because that is one of the  
12 criteria to give job and career opportunities in the  
13 construction industry to residents and demographics.

14 And people in our community that  
15 traditionally have not had those opportunities or  
16 have not learned skill sets in their schooling system  
17 prior to us meeting them. The program has graduated  
18 its ninth cohort currently. And there is a -- we do  
19 not have an open cohort right now, because the  
20 Pathways to Apprenticeship Program is doing a summer  
21 camp with the Syracuse City School District right now  
22 as we speak. It's one p.m. to five p.m. this summer.

23 So, they're not here today to speak on  
24 that, but I am here to tell you that that is one of  
25 Micron's commitments that they made to our community,

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2 to make sure everybody in the Central New York  
3 community has an opportunity to learn, earn, and stay  
4 with sustainable wages in Central New York.

5 The program has had so much success.  
6 It has expanded into Tompkins County Ithaca,  
7 graduated their first cohort a few weeks ago.

8 MR. DAVIS: Ten seconds.

9 MR. LANCETTE: And the Oswego cohort  
10 actually starts in two months. So, thank you for  
11 your time and thank you for this opportunity.

12 MR. DAVIS: Thank you. Are there any  
13 speakers who did not fill out a card but now having  
14 sat here for a little while are interested in  
15 speaking? Yes. So, if you could come down, come  
16 down to microphone. Since you didn't complete a  
17 card, I'm going to ask you to please state your name  
18 and spell your name, so that the Reporter can  
19 appropriately capture it. And we'll start here with  
20 you.

21 MR. HUERTA: I'll give her my card, so

22 --

23 COURT REPORTER: Your name?

24 MR. HUERTA: Sure.

25 MR. DAVIS: Please state your name.

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2 MR. HUERTA: My name is Raul Huerta.

3 MR. DAVIS: Okay.

4 MR. HUERTA: I'm from the Southwest.

5 And this is what I want to say to you. I'm from a  
6 family that founded Santa Fe. We enslaved people to  
7 steal gold out of the hills. What you are doing will  
8 have an impact on you and your families and your  
9 families' honor from now till the end of time. Okay?

10 I moved here in 1985 over a lot of  
11 objections. My wife took a job at Colgate. We came  
12 here. I went down to Onondaga Lake. You can't eat  
13 the fish there. You cannot eat the fish out of that  
14 lake. They're poisoned.

15 And that process started when the  
16 Jesuits decided to destroy the salmon that were --  
17 that were coming there, and that destroyed chunks of  
18 the people, the Onondaga people. Now, just a few  
19 yards away from that is where the great law of peace  
20 was declared and created when Hiawatha worked with in  
21 Onondaga.

22 And that is what created the great law  
23 of peace. Now, probably you all don't know about the  
24 great law of peace. You should learn about it. And  
25 you should learn from the fact that you cannot eat

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2 any of those fish.

3 And you guys are starting a mess with  
4 twenty percent -- twenty percent of the world's fresh  
5 water, which is what is in the Great Lakes. I  
6 watched in my home State of New Mexico people pumping  
7 water out of the Ogallala Aquifer, and that created  
8 huge desertification. It could drop the water table.  
9 You guys have to really think about that.

10 Now, I'm a Rotarian. And what do you  
11 do when you're a Rotarian? What's the first thing?  
12 Is it the truth? Is it fair to all concerned, is the  
13 second one. And I want you to think about the very  
14 last part of that. Will it be beneficial to all  
15 concerned? That involves the planet, that involves  
16 everyone on this planet, that involves the Earth and  
17 that involves everything.

18 And seriously, stealing that gold that  
19 we did made us wealthy. Okay? But we still are  
20 ashamed of what happened. Okay? You guys need to  
21 think like that. Seriously, twenty percent of the  
22 world's fresh --

23 MR. DAVIS: Ten seconds.

24 MR. HUERTA: -- water is in the Great  
25 Lakes. Thank you. Take care. Bye.

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2 MR. DAVIS: Thank you. Any other  
3 speakers that would like to speak, please? If you  
4 could state your name and address, that'd be helpful.  
5 Thank you.

6 MR. D'HOLLANDER: Yeah, I'll give her  
7 the information in detail.

8 MR. DAVIS: Sure.

9 MR. D'HOLLANDER: Raymond D'Hollander,  
10 Manlius, New York. I'm a retired civil engineer that  
11 worked for decades on cleaning up Superfund and other  
12 contaminated sites that originated before modern  
13 environmental laws and regulations came into effect.  
14 Modern industrial plants in New York do not create  
15 these impacts.

16 I can tell you from personal  
17 experience cleaning things up. We don't clean up  
18 modern industrial plants. Federal and state  
19 regulations beginning in the 1970s and 1980s largely  
20 eliminated pollution, so we now have clean water and  
21 clean air.

22 I was around back then. It's very  
23 different today for the quality of water. Also,  
24 we're now protecting wetlands. We're also managing  
25 stormwater, which was not being done in the 1960s,

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 1970s. I've actually read much of the D.A.I.S.

3 I am pleased to see that Micron is not  
4 taking shortcuts and requesting waivers of the  
5 numerous rigorous environmental laws and regulations  
6 that have been enacted over the past fifty-five  
7 years. New York State has rigorous environmental  
8 laws. Pushing Micron away from New York would  
9 actually increase global environmental impacts,  
10 because they would likely locate in a place with much  
11 less rigorous requirements, including greenhouse gas  
12 emissions. Thank you.

13 MR. DAVIS: Thank you. Are there any  
14 further speakers who would like to speak at this time  
15 that have not spoken? Okay. If there are any  
16 speakers who have already spoken, who would like an  
17 additional opportunity, an additional three minutes  
18 to speak, if you got cut off before, then I will ask  
19 you to come to the -- to the microphone.

20 We'll have you restate your name, so  
21 that we can capture that for the Reporter. And --  
22 and then, you have another three minutes to speak.  
23 Yes, ma'am?

24 MS. HOTALING: Louise Hotaling. One  
25 thing I forgot to mention is that I've been in

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2 manufacturing a good part of my life working with  
3 circuit boards and things like that. I'd like to  
4 know what's going to happen with the chemicals.

5 It's not all water. There's Ethylene,  
6 M.P.C., Freon, all these other chemicals. Where are  
7 they going to go? That's a big concern. Also, take  
8 a look at what we've done in the past, like over at  
9 Carrier. Yes, they did move out. But if any of  
10 you've drove by there lately, look at all the tons of  
11 dirt that they brought in there. Do you wonder why  
12 those tons of dirt was put in there? Because now if  
13 you drill down twenty feet, you're not going to see  
14 the chemicals.

15 But if you drill down before, two  
16 feet, you'd see chemicals. So, it's very important  
17 that we take a really strong look and really hold  
18 Micron responsible. If we do end up with this later  
19 on and end up with a spill, we can never replace what  
20 we've lost. Thank you.

21 MR. DAVIS: Thank you. Any other  
22 speakers that would like to speak that have spoken  
23 prior?

24 MR. LAW: Yeah, Tom Law. The question  
25 of brine -- brining the freshwater wetlands, there is

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 some science I've read that -- and -- and it's  
3 relatively common sense that, with all this use of  
4 salt on our roads, it gets washed into adjacent  
5 lands.

6 And this is, you know, month after  
7 month around here, with the snow and ice, December,  
8 January, February, March, probably the highest. But  
9 you are really changing fresh water into salt water  
10 when this happens.

11 And we're not talking about just four  
12 months. We're talking about years. And so, the  
13 question becomes, you may be rebooting wetlands in  
14 another location, which has positive wetland impact,  
15 but are you long-term, I mean, I didn't see design  
16 drawings in the water resources section of this. But  
17 is there consideration that the overflow, I mean,  
18 say, for example, there's a scenario. You've got  
19 salt. You've got heavy salt. The storm didn't show  
20 up exactly when you thought, but you salted the roads  
21 twice, the parking lot at Micron.

22 And then you have a rainstorm at the  
23 end of February. And it's two inches of rain or an  
24 inch-and-a-half of rain. It washes everything right  
25 away pretty much, depending on the sheet wash and --

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2 and -- and the dynamics of it. It washes that salt,  
3 you know, someplace.

4 So, what I'm getting at is you really  
5 are going to kill a wetland if you salt it up. It's  
6 not going to be a freshwater wetland anymore. And  
7 there aren't too many substitutes for using salt that  
8 -- that I've heard about. There are some, even  
9 strange ones, but I think it's a real issue. You  
10 know, how -- how are you going to really protect the  
11 wetlands long-term from the salt? Thank you.

12 MR. DAVIS: Thank you. Any further  
13 speakers? Yes.

14 MR. GARDNER: Trent Gardner, town --  
15 Town of Geddes. I also want to -- my background is  
16 in environmental services, industrial, specifically.  
17 I want to ask that when this plant is implemented a  
18 bit, that we carefully choose the companies doing the  
19 construction on these projects.

20 As we all know, the -- the trickle  
21 down is -- the administrative can make so many  
22 controls, engineering controls to help keep everybody  
23 safe, but it ultimately comes down to the individual  
24 workers as that are doing the job as to whether  
25 these, any sorts of chemicals or industry standards

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2 are adhered to.

3 Choosing companies more selectively  
4 that have higher safety standards that have higher  
5 environmental rapport, know the -- have more training  
6 within themselves. When selecting these companies to  
7 do the construction of the plant, the waterways to  
8 get these operations into Syracuse and all of the  
9 existing infrastructure that is going to be needed  
10 for this project, if we carefully select the  
11 companies that we choose to develop the  
12 infrastructure, we can help to eliminate some of the  
13 potential -- mitigate some of the potential effects  
14 that maybe cause environmentally or socio-  
15 economically as well in order to minimize the impact  
16 on local residents, local environment, et cetera, et  
17 cetera. Thank you.

18 MR. DAVIS: Thank you. Any further  
19 speakers? Please state your name again.

20 MR. TROIANO: Dan Troiano. Two things  
21 you left off your D.E.I.S. You destroy three hundred  
22 acres of wetlands, you're going to release three  
23 hundred and five thousand metric tons of carbon  
24 dioxide. It's the yearly emissions of sixty-six  
25 thousand cars, stored in the wetlands.

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2 You destroy that, you're going to  
3 remove the future carbon storage of that wetlands.  
4 You're going to release the emissions of sixty-six  
5 thousand cars, seven miles from my house. You cannot  
6 restore wetlands elsewhere.

7 Even after a hundred years of restored  
8 wetlands do not replicate the elect -- ecological  
9 functions of an intact wetlands. Out of six hundred  
10 and twenty-one restored wetlands, the ability for  
11 carbon storage is twenty-three percent lower than  
12 undisturbed wetlands.

13 And it has twenty-six percent less  
14 biodiversity. Replacing two hundred acres of  
15 wetlands in eight thousand feet of streams with six  
16 hundred and forty-five acres of impervious surfaces,  
17 parking lots, roads and roofs, and fifty-eight acres  
18 of semi-impervious surfaces results in increased  
19 flood risks downstream, storm water to Clay, the  
20 village of Phoenix and the City of Fulton have  
21 extreme flood risks.

22 Micron development will exacerbate  
23 flooding issues there and it's not even addressed in  
24 the D.E.I.S. Also, you're talking about sixty-four  
25 thousand more people. That also raises downstream

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2 flooding risk because you're going to start paving  
3 over my backyard. Five hundred and fifty dump trucks  
4 a day in an area already clogged with traffic. Who  
5 pays for the road destruction? Already three hundred  
6 and fifty trucks pass through the intersection of 31  
7 and Caughdenoy each day. Taxpayers on the hook for  
8 upkeep, rebuilding, safety and emergency situations,  
9 like accidents, spills, et cetera.

10 And who gets to tell the next of kin,  
11 their family was killed in a dump truck mishap.  
12 Like, the two people that just got flattened up an  
13 ass shoe by a dump truck. Nice. We're still here.

14 MR. DAVIS: Thank you. Any further  
15 speakers at this time? Yes. Please come forward and  
16 state your name.

17 MR. BLEIER: Thank you. My name is  
18 Brent Bleier, B-L-E-I-E-R. I live in the City of  
19 Syracuse. I came a little late. I'm -- I'm a little  
20 concerned because there's five of you gentlemen here.  
21 I don't see any people of color, and I don't see any  
22 women.

23 Now, I realize the whole industrial  
24 development agency is not necessarily represented at  
25 present, but I'm a little concerned about at least on

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2 the surface here today, a lack of diversity and  
3 inclusion.

4 The thought I had discussing this a  
5 few days ago with another gentleman, was if and I  
6 believe the plant calls for four plants, and is built  
7 sequentially, I think. Is there any mechanism in  
8 place who can be added? So, after the first plant is  
9 built, a review could be made of -- of the impact and  
10 of the technology and particularly environment.

11 I realize a lot of things need to be  
12 done for that first plant that wouldn't need to be  
13 replicated for each additional plant if -- if the  
14 whole thing goes that far. But there may be some  
15 improvements, so to speak, to the infrastructure, to  
16 the way electricity and gas is handled, particularly  
17 the way the traffic and transportation is handled.

18 Because all of us or many of us on  
19 light -- in light wise is a learning curve. So, I'm  
20 wondering if in a sequential project such as this,  
21 there -- there is, there will be mechanism to  
22 evaluate everything that has been done and it's  
23 potentially going to be done and maybe -- and the  
24 technology -- different technologies may well be  
25 available when this second plant is ready to go, I

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2 would assume. So, I don't know if it's going to be  
3 another impact. I doubt it.

4 But another impact statement or review  
5 of the actual impacts that all of us have witnessed,  
6 including Micron, I'm sure Micron's going to make  
7 improvements to help their end of it, the  
8 manufacturing end of it. But in terms of the  
9 community and the environment and other factors that  
10 are shared by those of us regionally, I'm wondering  
11 if there's a way we could have a reviewing. Maybe  
12 the re -- maybe it's already in this, but I'm just a  
13 little bit concerned.

14 Because I know Micron will certainly  
15 learn whatever lessons they need to learn to improve  
16 their manufacturing efficiency and -- and profit and  
17 -- and whatever else. But I'm just wondering in  
18 terms of the community and the general public, if  
19 there's a way there can be a review, if we get to the  
20 point where the first one is up and running and we  
21 have new knowledge gained on -- on all -- almost all  
22 aspects that have --

23 MR. DAVIS: Ten seconds.

24 MR. BLEIER: -- been touched in here.  
25 So, thank you very much for your time, and I admire

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 your patience in listening to so many of us.

3 MR. DAVIS: Thank you. Any further  
4 speakers? Okay. This is a scheduled session that  
5 will go until five o'clock. It is roughly three  
6 forty-five now. There are more speakers that may  
7 show up during this time period. So, this session  
8 will remain open.

9 I am going to take a -- a brief bio  
10 break. And then we'll come back. As more people  
11 come into register, I will open up the comments  
12 again. And then, as we get closer to the end of the  
13 session, I will also open it up again.

14 I appreciate for anybody that is going  
15 to be leaving now, we really appreciate your  
16 comments, receiving your comments. Thank you very  
17 much for participating. The session will remain open  
18 until five o'clock. Thanks.

19 (Off the record; 03:42 p.m.)

20 (On the record; 04:01 p.m.)

21 MR. DAVIS: Back on the record now.  
22 After a quick break, I'm going to ask you to please  
23 take your seats. Thank you. So, I do have some more  
24 speakers that have registered to speak. First, we'll  
25 have Brad Santee. Let me make sure I have my glasses

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2 on.

3 Yup. And then, Gene Cooper. I will,  
4 you know, we have a three minute time limit for  
5 speakers. You can use the three minutes. I will  
6 then, ask the next speaker to speak at the conclusion  
7 of that. There's an opportunity to come back up if  
8 you needed additional time. Okay? And if you could  
9 please state your name for the Reporter.

10 MR. SANTEE: I -- I appreciate.

11 MR. DAVIS: So, Brad?

12 MR. SANTEE: Yes. Test, test. Yeah.

13 My name is Brad Santee. And I live directly across  
14 from the Oak Orchard Wastewater Treatment Plant. I'm  
15 here today to place some concerns about proposed  
16 industrial Wastewater Treatment Plant's expansion  
17 being planned as part of the Micron semi-conductor  
18 project.

19 First, I wanted to emphasize this is  
20 not a temporary disrupt - disruption once built, the  
21 Wastewater Treatment Plant will become a long-term  
22 industrial utility site, processing millions of  
23 gallons of wastewater per day from a multi-fab chip  
24 facility.

25 The change to the landscape isn't

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2 short lived or marginal. It's a permanent structural  
3 shift in how the area will look, function and affect  
4 those of us who live nearby or along the river. The  
5 D.E.I.S. provides very little detail about the  
6 physical layout or visual impact of the plant itself.  
7 What is mentioned is deeply concerned that the Oak  
8 Orchard facility will reportedly rival the Hiawatha  
9 Boulevard Treatment Plant, which has long been  
10 associated with odor and more commonly recent serious  
11 air quality issues.

12           Importantly, that facility is located  
13 in a commercial zone, not in a residential community.  
14 That is the precedent for what will be constructed  
15 across the street from my house. This is alarming.  
16 There are no public facing renderings yet. No  
17 elevation drawings. No clear plans describing what  
18 this facility will look like. Or how close to  
19 property lines would be. Let's see. It's supposed  
20 to fill every inch of the seventy-six acre parcel,  
21 which Oakwood -- Oakwood currently occupies.

22           I'm mostly deeply concerned about the  
23 chemical risks. The D.E.I.S. confirms Microns  
24 wastewater treatment will contain PFAS forever  
25 chemicals, corrosive acids, industrial solvents and

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 heavy metals. While treatment methods like reverse  
3 osmosis and carbon filtration are referenced, these  
4 systems are not yet built or proven and no specific  
5 discharge thresholds have been provided.

6 We are being asked to trust that  
7 everything will work perfectly. That trust was  
8 recently compromised in March 2024. And following --  
9 following the power outage, over five million gallons  
10 of untreated sewage were discharged into the Oneida  
11 River.

12 In a single point of failure under  
13 current low flow conditions, it can cause that kind  
14 of damage. You know, what will it look like when we  
15 have a much more high volume? Another major issue is  
16 the so called buffer zone.

17 Again, the D.E.I.S. references a  
18 hundred foot wooded buffer between the plant and  
19 nearby homes. Based on what I see every day, those  
20 trees may not be able to -- they're not -- they're  
21 not county owned for one thing.

22 And the risk of old growth that has  
23 been between the fields for, since they built the  
24 plant. It provides zero protection from the  
25 facility's impact. From my front yard, I can hear

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2 the loudspeakers from the plant, maybe a mass  
3 certification tests, I would assume.

4 The vibrations are so strong, they  
5 shake the ground, wake up the children, or interrupt  
6 your sleep when the -- the machines spin up.

7 MR. DAVIS: Okay. I'll -- I'll ask  
8 you to stop there. But I will call --

9 MR. SANTEE: Uh-huh.

10 MR. DAVIS: -- call you back with  
11 another opportunity to finish up. But I give the  
12 next speaker their three minutes and then, I'll have  
13 you come back.

14 MR. SANTEE: Okay. That's okay.

15 MR. DAVIS: Thank you.

16 MR. SANTEE: I'll -- I'll submit to  
17 the email.

18 MR. DAVIS: Yeah.

19 MR. SANTEE: Thanks, Davis.

20 MR. DAVIS: Thank you. Gene -- Gene  
21 Cooper. Brad, you might have a quicker opportunity  
22 to come back. Gene Cooper? No. All right. Brad,  
23 another three minutes on the clock.

24 MR. SANTEE: That won't take that  
25 long. So, the hundred foot strip is unmanaged tree

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2 growth. This is inadequate. Best practices for  
3 wastewater facilities recommend at least five hundred  
4 when you're near residential. And of course, that's  
5 without any other mitigations, like berms, buffers,  
6 walls, like you would see on the eighty-one project,  
7 stuff like this. This is what we want to see in the  
8 drawings eventually.

9 So, in closing, I ask the County and  
10 Micron has been leaders to consider the following,  
11 significantly expand the required buffer zone and  
12 include a targeted mitigation measures, such as  
13 berming and screening, release detailed publicly  
14 accessible building plans before final site approval  
15 and enforce some chemical discharge thresholds.

16 So, in essence, that's it. A lot of  
17 people probably don't talk about the vibration or  
18 noise. But if you're anywhere in the area, this is a  
19 -- an effect that we all feel. So, all right.  
20 That's it. Thank you.

21 MR. DAVIS: Thank you. Okay. Any  
22 additional speakers at this time that would like to  
23 come forward and speak? Okay. So, just like we just  
24 did the last time with no speakers here currently, it  
25 remains open. We will just go into a little bit of a

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2 pause period in case new speakers arrive, that would  
3 like to speak over the next fifty-three minutes.

4 So, you can resume your conversations.  
5 And as more speakers come in, I will interrupt and  
6 bring those forward. Thank you.

7 (Off the record; 04:07 p.m.)

8 (On the record; 04:23 p.m.)

9 MR. DAVIS: So, I will reopen.

10 COURT REPORTER: Yes.

11 MR. DAVIS: Are you ready?

12 COURT REPORTER: Yes.

13 MR. DAVIS: Okay. Perfect. Thank  
14 you. And Susan M.H. Flick, please come forward.  
15 Susan, if you could state your name. We're giving  
16 the same procedure for everyone. You'll have three  
17 minutes to speak, okay?

18 If you needed additional time after  
19 that, the -- the buzz -- the buzzer will go off.  
20 I'll ask if there's anyone else that wants to speak,  
21 give them an opportunity. If not, then I'll open it  
22 back up to you for an additional three minutes.

23 MS. FLICK: Thank you. My name is  
24 Susan Flick, F-L-I-C-K. And this will be very brief  
25 because I'm submitting a written statement as well.

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2 I just wanted to say that given omissions and  
3 incomplete or inadequate plans in the D.E.I.S. to  
4 address certain environmental energy, economic, and  
5 quality of life issues, I ask that the plan include  
6 ways that local experts can voluntarily suggest  
7 potential solutions that allow the potential for  
8 creative best practice, practical ideas, creative  
9 ideas, based on local conditions. And that's all for  
10 now. Thank you.

11 MR. DAVIS: Thank you. Okay. I will  
12 again ask anyone in the audience, is there anyone  
13 here that would like to speak that has not spoken?  
14 Any new speakers? Any repeat speakers? Okay. We  
15 still have another thirty-six minutes under this  
16 session.

17 And then we'll take a break at five  
18 o'clock. And then, the evening session will start at  
19 six. So, we'll go back on pause.

20 (Off the record; 04:25 p.m.)

21 (On the record; 04:44 p.m.)

22 MR. DAVIS: On -- on the record and I  
23 will ask Liza Bernard, if she could come down and  
24 speak, Liza, three minutes. You'll have additional  
25 three minutes if you go beyond that. But I have one

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 other speaker that I -- I'll put in the middle.  
3 Okay? So, turn over to you for three minutes. Could  
4 you please state your name for the Court Reporter?

5 MS. BERNARD: Yeah. My name is Liza  
6 Bernard. I'm a resident of Syracuse. And I have  
7 concerns about the -- the water pollution that  
8 Micron's plant will have on this region. I  
9 understand that it's going to be the greenest chip  
10 plant probably in the world if their plans go well,  
11 but it still sounds like a -- a large chunk of that  
12 water will not be cleaned for forever chemicals,  
13 heavy metals. And I'm concerned about what that will  
14 do to the water table.

15 I also understand that this is a  
16 historic investment opportunity for this region  
17 that's been in decline for, you know, decades. But I  
18 don't think sacrificing our environmental and  
19 physical health is worth it. Yeah. So, I think -- I  
20 think the water should be clean. I think we need to  
21 keep that in mind.

22 MR. DAVIS: Thank you. Any other  
23 speakers that would like to speak? Yes, sir. If I  
24 can just ask you to state your name again.

25 MR. HUERTA: Sure.

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2 MR. DAVIS: Thank you.

3 MR. HUERTA: She's got my card.

4 Hello, I'm Raul Huerta. I'm from Liverpool now,  
5 originally, from New Mexico, one of the families  
6 founded in Santa Fe. And so, before you all were on  
7 this continent, my family was here on this continent  
8 in 1530 just to give you a context. Okay?

9 One of the things that I did in  
10 college was think a lot about mechanization. There's  
11 a wonderful book by Sigfried Gideon called  
12 Mechanization Takes Command, in which in anything  
13 that touches an object, bread, whatever, it changes  
14 it inextricably and -- and -- and forever.

15 The singularity is very close. We all  
16 know that. The singularity is very close. And  
17 twenty years from now, to assume that there's going  
18 to be a pantheon of workers at Micron is foolish.  
19 There won't be anyone there. It's all going to be  
20 machines. It's all going to be machines. The  
21 trucks, driven by machines. Everything will be  
22 automated because of those chips, which is a good  
23 thing or a bad thing. Depends on your perspective.

24 So, I really don't see how this plant  
25 will not occur for lots of reasons. But as I said

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2 before, you have to really think about what this  
3 means for you and your family. You all aren't going  
4 to have jobs either, because the machine will do it  
5 better and more efficiently; and you don't have to  
6 pay for health care. You don't have to pay anything.

7 So, please, please, please think about  
8 the water at least. Again, it's twenty percent of  
9 the world's fresh water. We have to preserve it.  
10 You can't poison it for the others. I think the  
11 Canadians will get a little upset if that stuff  
12 starts showing up in Canada, okay?

13 So, I thank you very much. I know how  
14 hard this is. People coming up and some people  
15 yelling at you. But seriously, think about it. And  
16 the first part as in the rotary four-way test, is it  
17 the truth? And the last part was, will it be  
18 beneficial for all?

19 So, please think of that. Please  
20 consider it. We won't need any lawyers. I mean,  
21 after all, what did -- what did they say in Richard  
22 II? What's the first thing we do? We get rid of all  
23 the lawyers, right? So, take care. Thank you.

24 And enjoy. Have a nice lunch, dinner,  
25 whatever you're about to have and then, come back and

1 7/24/2025 - Micron Semiconductor Manufacturing Project  
2 have everybody yell at you once again. So, take  
3 care. We'll see you. Bye.

4 MR. DAVIS: Thank you. Any other  
5 speakers at this time? Okay. We have ten minutes.  
6 I will keep this open for ten minutes at four fifty-  
7 nine, barring anybody else coming into who want to  
8 speak, I will then come back and we will proceed with  
9 you folks. So, ten more minutes. Thank you.  
10 Briefly, we're good?

11 COURT REPORTER: Good.

12 MR. DAVIS: Okay. It is -- are there  
13 any speakers in the audience that would like to speak  
14 at this time? Any new speakers? Okay. Seeing none,  
15 I am going to close this afternoon session of the  
16 public hearing. We appreciate everyone coming.  
17 Appreciate your comments.

18 We will close this session, and the  
19 evening session will start at six o'clock. Thank  
20 you.

21 (The public hearing concluded at 5:00  
22 p.m.)

23

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2 STATE OF NEW YORK

3 I, CARI RORABACK, do hereby certify that the  
4 foregoing was reported by me, in the cause, at the time  
5 and place, as stated in the caption hereto, at Page 1  
6 hereof; that the foregoing typewritten transcription,  
7 consisting of pages number 1 to 94, inclusive, is a true  
8 record prepared by Associated Reporters Int'l., Inc. from  
9 materials provided by me.

10 IN WITNESS WHEREOF, I have hereunto  
11 subscribed my name, this the 31st day of July, 2025.

12 *Cari Roraback*

13 CARI RORABACK, Reporter

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**APPENDIX B**  
**MICRON CAMPUS SITE SELECTION BACKGROUND, CONSTRUCTION**  
**PHASES, SITE LAYOUT ALTERNATIVES, REVISED CONSTRUCTION**  
**SCHEDULE, AND TECHNICAL MEMO**

## **Appendix B-1**

### **Micron Campus Site Selection Background**

## **B-1 Micron Campus Site Selection Background**

This section describes: (1) the process that the State of New York conducted to identify semiconductor technology parks sufficient in scale to advance the State's semiconductor manufacturing sector; (2) the process that OCIDA conducted to identify sites in Onondaga County sufficient in scale to host a large-scale semiconductor manufacturing facility; (3) the process and criteria that Micron used to identify a sufficient location for a large-scale memory chip manufacturing facility; and (4) the additional property search Micron conducted to identify potential alternative locations for its facility.

### **B-1.1 New York State Selection of WPCP**

In 1997, New York State initiated the CHIP FAB 98 / SEMI-NY Program to promote the growth of the State's semiconductor manufacturing industry. Led by the Governor's Office for Regulatory Reform and the Empire State Economic Development Council (NYSEDC), this initiative began by identifying suitable sites. A list of 55 candidate sites throughout the State was narrowed to 13 sufficient to meet then-current industry standards. (Apte, 1998; Gargano, 2006).

By the year 2000, three sites—Luther Forest (in Malta, NY, Saratoga County), Marcy Nanocenter (in Marcy, NY, Oneida County), and the WPCP—were identified as “shovel ready,” i.e., they had completed certain pre-permitting requirements applicable at that time. In 2017, NYSEDC updated its site suitability criteria and arrived at four potentially suitable sites: the Marcy Nanocenter; the Western NY Science, Technology, and Advanced Manufacturing Park (STAMP) near Batavia in Genesee County; Luther Forest; and the WPCP. NYSEDC's evaluation included 5 primary criteria with 108 geographical viability factors, including site quality, and reliability. The evaluation benchmarked the four sites against six other competing locations nationwide. Of the evaluated sites, only the WPCP and Marcy Nanocenter ranked the highest nationally for utility access and development readiness (Newmark Knight Frank, 2018).

The Marcy Nanocenter is a 434-acre greenfield campus. A substantial portion of that campus was developed in 2022 by Mohawk Valley EDGE for semiconductor manufacturing, and only approximately 130 acres remain for stormwater management infrastructure, compensatory wetland mitigation, and development buffers. Therefore, this location is no longer available and would be too small for the Proposed Project (see Section 1.1).

The STAMP site, covering 1,250 acres, has seen significant development by other companies, reducing its available space to five non-contiguous parcels totaling 540 acres, the largest of which is 310 acres. This location would be too small for the Proposed Project.

The Luther Forest site was developed for semiconductor manufacturing and is currently occupied by GlobalFoundries, which has purchased the only remaining 800 undeveloped acres at the site. This location is no longer available and would be too small for the Proposed Project.

### **B-1.2 Onondaga County Selection of WPCP**

Onondaga County presented the WPCP to the State as a suitable site for semiconductor manufacturing as part of a longstanding process to identify and develop a suitable site in the County for industrial manufacturing. In 1991, OCIDA and the City of Syracuse Chamber of

Commerce initiated an Industrial Park Feasibility Study to identify potential locations for industrial businesses in Onondaga County. Of the two sites the study identified—a site in the Town of Lysander and the WPCP—the WPCP emerged as the preferred choice due to its proximity to National Grid’s electric substation in Clay, excellent highway access, and ability to be rezoned for industrial use. From 1991 to 1999, the County acquired seven properties, forming the original 340-acre WPCP.

Onondaga County received feedback from prospective site selectors and companies that the 340-acre site would be insufficient for the economic needs of contemporary large-scale semiconductor manufacturing. The County expanded the WPCP on multiple occasions until it ultimately reached its current 1,339-acre area. In addition to expanding the size of the WPCP, the County began addressing other essential project requirements, including access to adequate, reliable electricity, natural gas, and water supply, and wastewater treatment capacity.

OCIDA completed a GEIS, which was supplemented in 2021, that identified and screened various alternatives to the WPCP within Onondaga County. The analysis concluded that the WPCP was the only viable option to meet the semiconductor industry’s needs, as it meets specific project pre-requisites, including a large, contiguous parcel of land controlled by a single owner, and access to significant, redundant, and resilient transportation and utility infrastructure (OCIDA, 2013).

### **B-1.3 Micron Site Search**

In 2021, Micron initiated a search for potentially suitable sites to construct a large-scale memory chip manufacturing facility that would also be able to achieve U.S. national and economic security goals, based on then-emerging consideration in Congress of new legislation to incentivize re-shoring of chip manufacturing, including large-scale, commercially viable fab clusters capable of enduring foreign competition—goals that ultimately became the basis for the CHIPS Act and the Department of Commerce’s priorities in the NOFO for commercial semiconductor fabrication facilities (see Section 1.1).

Consistent with the above goals, which form the basis of CPO’s purpose and need described in Section 1.1, and Micron’s analysis of memory chip fab cluster trends described in Appendix A-1, the combination of then-developing Federal priorities for large fab clusters and Micron’s annual long-range SNOP process coincided to shape Micron’s site search. Specifically, to attract Federal and other sources of investment and achieve global competitiveness, Micron determined that it would need to identify a site capable of hosting a commercially viable, four-fab memory chip manufacturing facility with a cleanroom size of at least 600,000 sq. ft. and a fab size of at least 1.2 million sq. ft. (for a total 2.4 million sq. ft. of cleanroom space and 4.8 million sq. ft. of fab space). This four-fab configuration also would be necessary to achieve a memory chip production output of 52,000 wafers per week on average over the life of the facility capable of meeting Micron’s market-based forecast for the output required to be commercially viable given memory chip industry competition in East Asia.

Micron also determined that construction of 2.4 million sq. ft. of cleanroom space would necessitate the construction of ancillary buildings, such as central utility buildings, hazardous process materials buildings, bulk and specialty gas storage, and other on-site infrastructure, as described in Section 2.1.1.5 and Table 2.1-3. Given the competitiveness and cost sensitivity of the DRAM market, Micron determined that it would require a single site of sufficient size to co-locate

and accommodate all of the fab space and infrastructure described above, and that developing disparate parcels with duplicative infrastructure and supply chain needs would preclude Micron from achieving a cost-efficient memory chip operation capable of global competitiveness and attracting Federal and other sources of investment. For the above reasons, Micron determined that it would require a minimum single site footprint of 1,000 acres or more.

This approach is consistent with semiconductor industry competitiveness trends that drive companies in this space to co-locate multiple fabs on a single site to achieve economies of scale and efficient supply chain and feedstock management, while minimizing costs, as well as minimizing total project footprints and ground disturbance (see Section 1.1).

In the context of these goals, Micron began exploring potential sites for a four-fab memory chip manufacturing facility in New York State in late 2021. To facilitate its search, Micron developed a set of site selection criteria, detailed in Table B-1 below, including the minimum 1,000-acre site size, utility and energy availability, transportation accessibility, workforce development capacity, time-to-market (permitting and approvability), climate-related risks, place enhancement (livability) considerations, advanced manufacturing ecosystem (including supply chain) considerations, and the availability of Federal and State financial incentives, among various other technical and socioeconomic factors.

**Table B-1 Micron Site Selection Criteria**

| Criteria                                    | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|---------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Site availability                           | Potential sites would need to be available for acquisition.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| Minimum site size of 1,000 contiguous acres | <p>See explanation of 1,000-acre size requirement in text above.</p> <p>Sufficient parcel size would be essential to accommodate the necessary size of the manufacturing buildings to economically meet production goals while maintaining adequate spacing between the fab buildings and providing the space needed for ancillary structures, utilities, and other infrastructure.</p> <p>The parcel also would need to be fully contiguous and could not be irregularly shaped or preclude a uniform manufacturing facility layout capable of maximizing fab interoperability, efficiencies, and economies of scale, driven by minimizing automated device travel times across fabs (see Appendix B-3). The contiguous land criterion also would be necessary to ensure that all facility components could be efficiently integrated and operated on a single campus, reducing the need for multiple utility or other site connections that would make the facility uncompetitive with its peers and global competitors.</p> |
| Zoning                                      | Potential sites would need to be zoned or readily able to be zoned to accommodate the proposed manufacturing use.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| Geological conditions                       | <p>Potential sites would need to have a relatively flat topography with geological conditions capable of supporting an efficient four-fab layout and adequate foundations to support such a design.</p> <p>A site with a geotechnical makeup and topography that would require substantial excavation and import of fill material also would need to have proximity to rail transport or other cost-effective transportation methods capable of bringing substantial volumes of fill and other construction materials</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |

|                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|-------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                               | <p>on-site, while avoiding prohibitive increased costs and environmental and community effects from transporting large volumes by truck.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| Electricity supply            | <p>Potential sites would need to have proximity to robust electric transmission infrastructure capable of providing electricity at 345 kV or higher to the entire site, with sufficient available on-site or adjacent land for dedicated substations and transformers, or to a technically and economically feasible and practicable plan to expand such capacity and capability to connect to such supplies.</p> <p>A multi-fab facility requires a stable and continuous 24/7 electricity supply from highly resilient, non-intermittent sources, including dual feed electrical service with high resistance to voltage fluctuations. Any disruption in power can dramatically impact the semiconductor manufacturing process and lead to substantial operational inefficiencies and production and financial losses.</p> |
| Natural gas supply            | <p>Potential sites would need to have ready access to substantial natural gas supplies and distribution capacity, or to a technically and economically feasible and practicable plan to expand such capacity and a route to connect to such supplies.</p> <p>Natural gas is required for its thermal value in semiconductor manufacturing, which depends on several heating processes that together could overwhelm otherwise reasonable electricity supplies and infrastructure.</p>                                                                                                                                                                                                                                                                                                                                        |
| Water supply                  | <p>Potential sites would need to have ready access to substantial water supplies and transmission capacity, or to a technically and economically feasible and practicable plan to expand such capacity and a route to connect to such supplies.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| Wastewater treatment capacity | <p>Potential sites would need to have ready access to substantial wastewater treatment infrastructure with adequate capacity to accommodate a large-scale semiconductor facility, or to a technically and economically feasible and practicable plan to expand such capacity and a route to connect to such service.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Highway access                | <p>Potential sites would need to be located within 20 miles of an interstate highway. Proximity to highway access would be required to facilitate efficient transportation of materials, products, and personnel for a four-fab facility.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| Airport access                | <p>Potential sites would need to be located within 30 miles of a domestic commercial airport and 50 miles of an international commercial airport. Proximity to air transport is needed to support efficient movement of personnel and critical components to a large-scale semiconductor manufacturing facility.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| Specialized workforce         | <p>Potential sites would need to be in an area with a sufficiently large, specialized labor force capable of supporting highly advanced manufacturing processes and specialized equipment operation and maintenance needs.</p> <p>In addition, potential sites would need to be in proximity to institutions of higher learning and institutions for research and development, training, and innovation, such as military bases, technical colleges, universities, and other sources of technical direct labor, which are essential to providing skilled labor, continuing education, and training programs to keep a specialized workforce familiar with relevant technological advancements and industry practices.</p>                                                                                                    |

Source: Micron Technology.

At the time that Micron began exploring sites in New York State in late 2021, three of the four viable State-identified technology sites (Marcy Nanocenter, STAMP, Luther Forest, and the WPCP) were unavailable or too small for the four fabs needed to satisfy Micron’s search criteria. Marcy Nanocenter only had 130 acres available, GlobalFoundries held an option contract on Luther Forest, and STAMP offered only 540 non-contiguous acres. Only the WPCP remained, which satisfied all of Micron’s site selection criteria in Table B-1.

**B-1.4 Micron Updated Site Search**

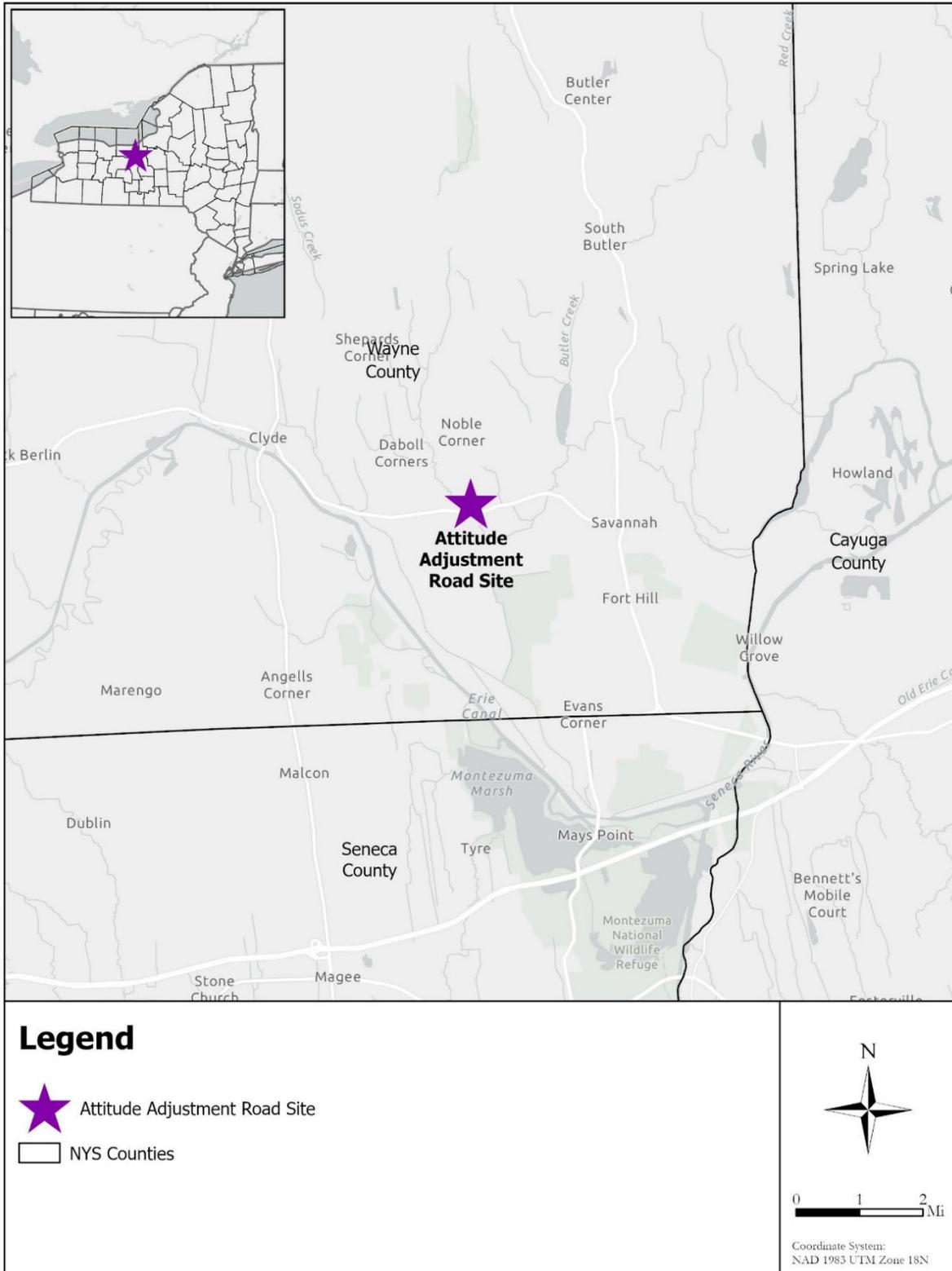
In 2024, Micron conducted an updated property search to identify other potentially reasonable alternative sites for the Proposed Project. Using an available parcel listing survey, Micron identified three sites, including the WPCP, that were available for purchase and that were 1,000 acres or greater in size. See Figure B-1, Figure B-2, and Figure B-3 for site locations. Micron evaluated each site against its site selection criteria. The results are summarized in Table B-2 below. Of the three sites, only the WPCP was located in a NYISO Load Zone with the potential to provide a sufficiently reliable and stable electricity supply to the Proposed Project. In addition, the WPCP satisfied all of Micron’s other site selection criteria, whereas the other two sites failed several criteria.

**Table B-2 Updated Site Search Results**

| Site                                                              | 1                      | 2            | 3                               |
|-------------------------------------------------------------------|------------------------|--------------|---------------------------------|
| Site Name                                                         | Attitude Adjustment Rd | Creek Road   | White Pine Commerce Park (WPCP) |
| County                                                            | Wayne                  | Cattaraugus  | Onondaga                        |
| Parcel ID                                                         | 76111-00-115772        | 4.003-1-22   | Multiple                        |
| Available for Purchase                                            | Yes                    | Yes          | Yes                             |
| Parcel Acreage                                                    | 3,929                  | 1,217        | 1,376                           |
| Industrial zoning                                                 | No                     | No           | Yes                             |
| Adequate geology and topography                                   | No                     | No           | Yes                             |
| Floodplains present                                               | Yes                    | No           | No                              |
| Adequate power / NYISO Load Zone / adequate transmission capacity | No / B / Yes           | No / A / Yes | Yes / C / Yes                   |
| Adequate natural gas supplies                                     | Yes                    | No           | Yes                             |
| Adequate water supplies                                           | No                     | No           | Yes                             |
| Adequate wastewater capacity                                      | Yes                    | No           | Yes                             |
| Proximity to highways                                             | Yes                    | Yes          | Yes                             |
| Proximity to airports                                             | Yes                    | Yes          | Yes                             |
| Specialized workforce available                                   | No                     | No           | Yes                             |

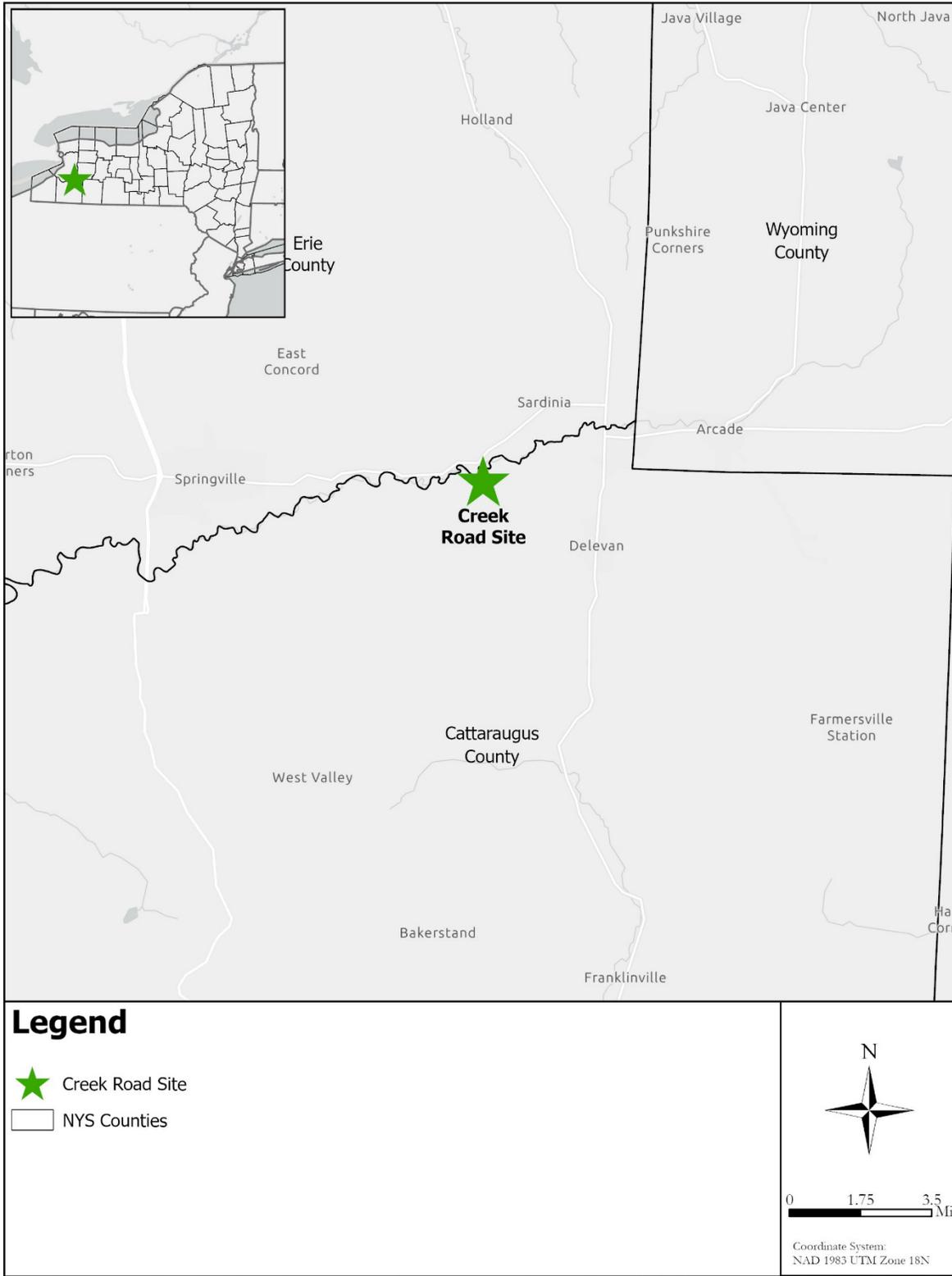
Source: Micron Technology.

**Figure B-1 Attitude Adjustment Road Site Location**



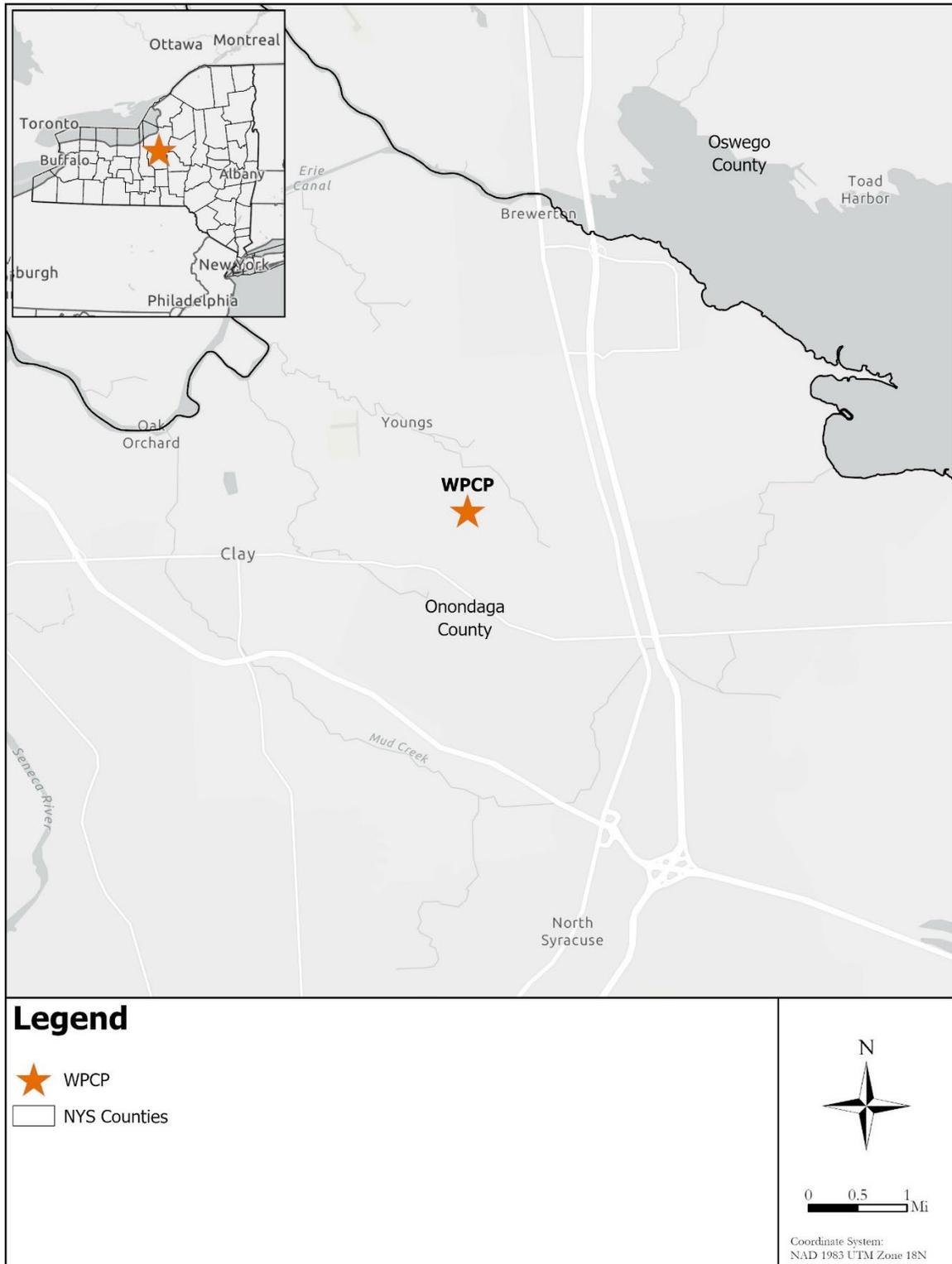
Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community; Sources: Esri, TomTom, Garmin, (c) OpenStreetMap contributors, and the GIS User Community

**Figure B-2 Creek Road Site Location**



Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community; Sources: Esri, TomTom, Garmin, (c) OpenStreetMap contributors, and the GIS User Community

**Figure B-3 WPCP Site Location**



Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community; Sources: Esri, TomTom, Garmin, (c) OpenStreetMap contributors, and the GIS User Community

## **References**

- Apte, V. (1998). Onondaga County site is in the race for microchip manufacturing plant. *Central New York Business Journal*. 12(8), 1.
- Gargano, C. (2006). Building the high-tech future. *Economic Development Journal*, 5(2), 47.
- Newmark Knight Frank. (2018). Project Rhino: Competitive Site Location Benchmarking for Semiconductor Manufacturing. Prepared for the New York State Economic Development Corporation.
- OCIDA. (2013). Final Generic Environmental Impact Statement (SGEIS).

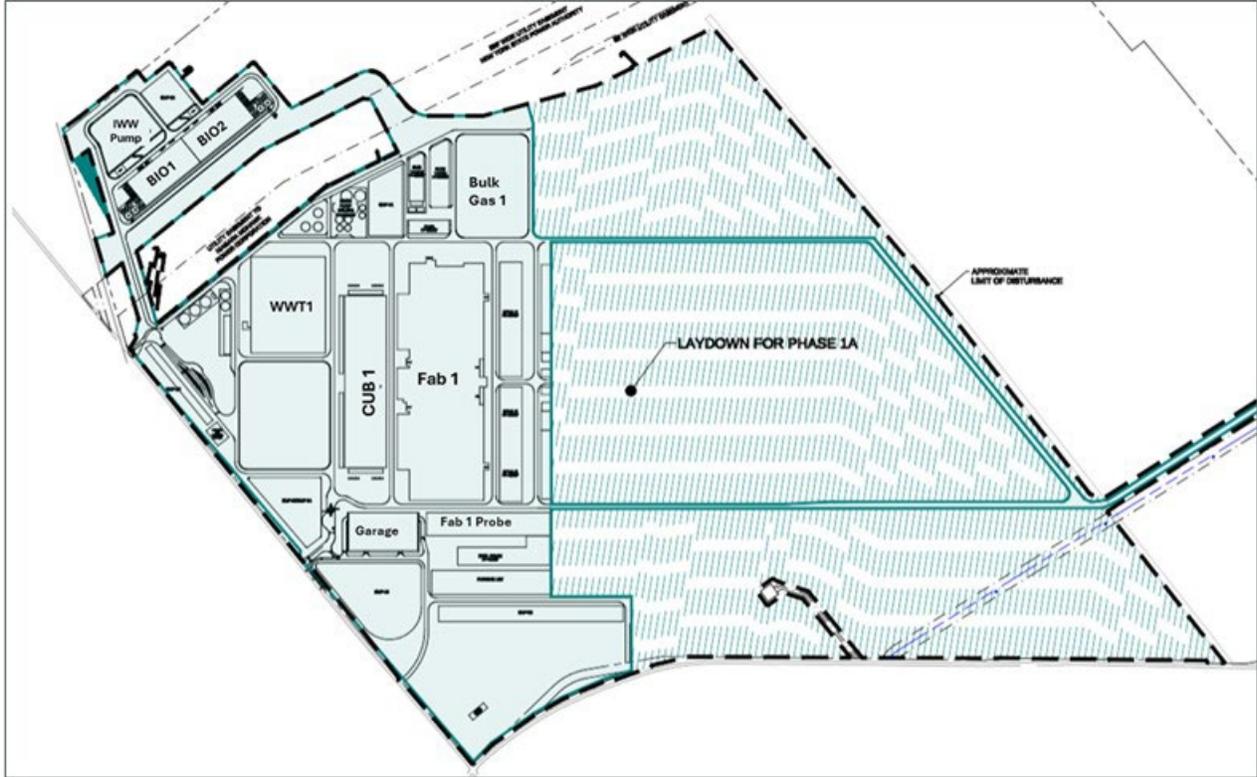
## **Appendix B-2**

### **Micron Campus Construction Phases**

## B-2 Micron Campus Construction Phases

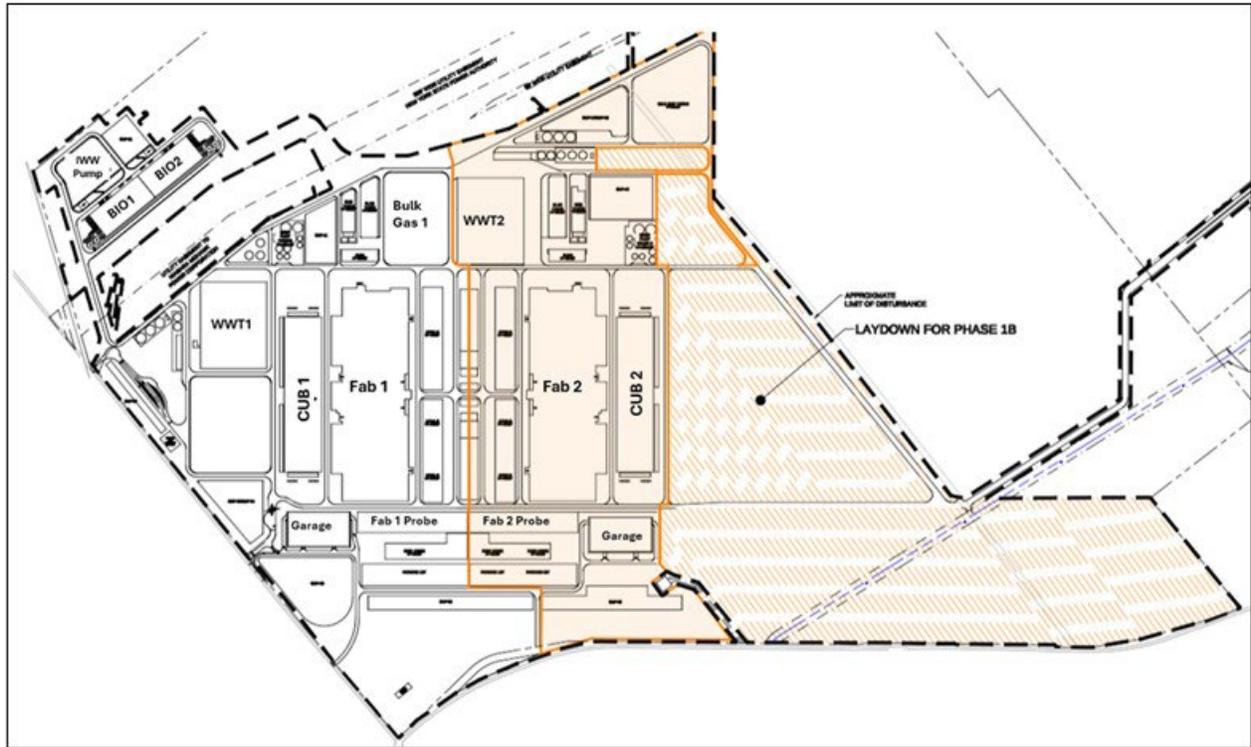
As noted in Section 2.1.1.1, the four fabs at the proposed Micron Campus would be built sequentially from west to east. The four figures below show schematics of the build-out.

**Figure B-4 Micron Campus Construction – Phase 1A<sup>6</sup>**



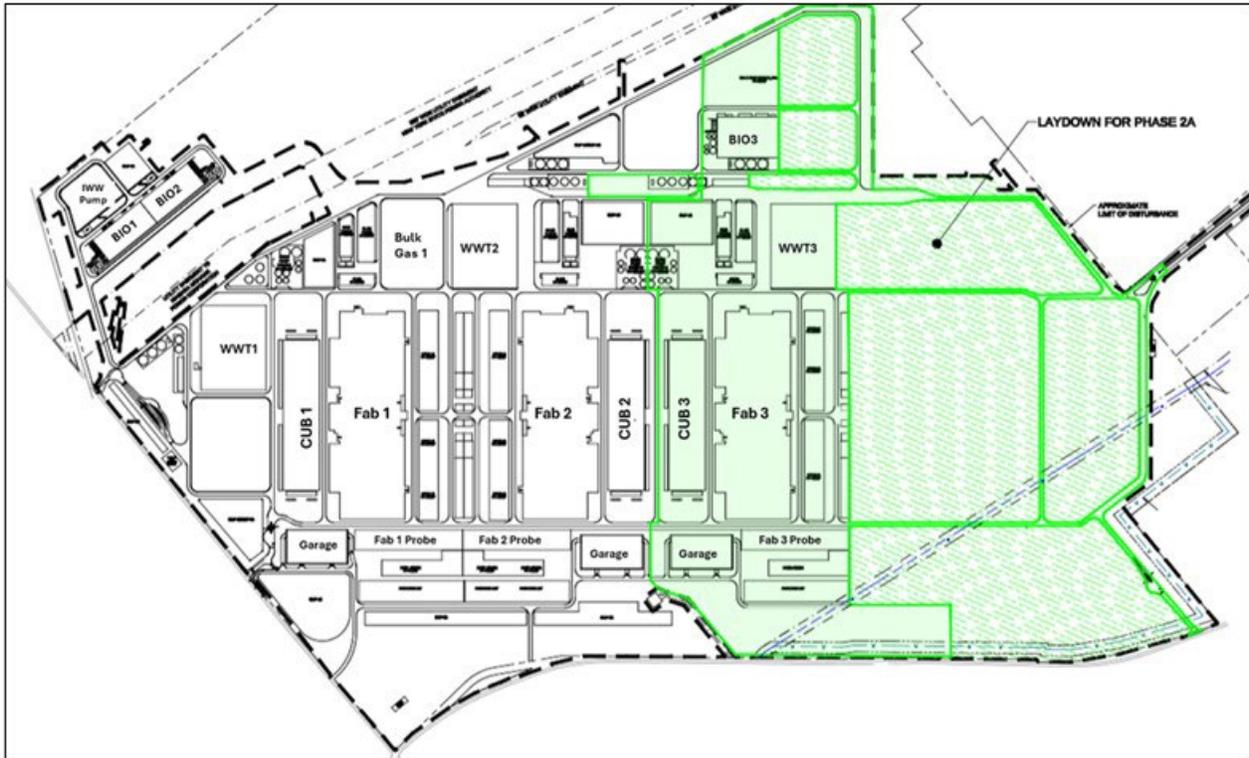
<sup>6</sup> Ground clearing of the entire Phase 1A area would occur in Q4 2025, during the bat hibernation period.

**Figure B-5 Micron Campus Construction – Phase 1B<sup>7</sup>**



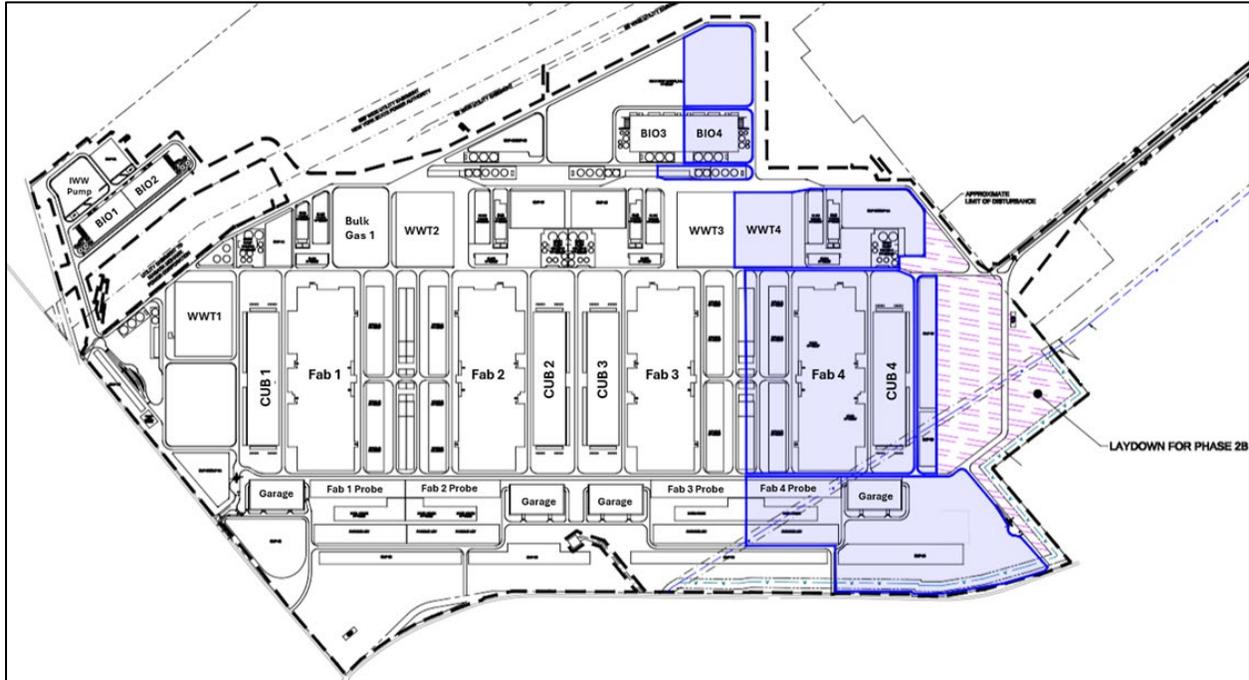
<sup>7</sup> Although construction would be scheduled for Q3 2028, additional ground clearing in the Phase 1B area would occur in Q4 2028, during the bat hibernation period.

Figure B-6 Micron Campus Construction – Phase 2A<sup>8</sup>



<sup>8</sup> Although construction would be scheduled for Q3 2033, additional ground clearing in the Phase 2A area would occur in Q4 2033, during the bat hibernation period.

Figure B-7 Micron Campus Construction – Phase 2B<sup>9</sup>



<sup>9</sup> Although construction would be scheduled for Q2 2039, additional ground clearing in the Phase 2B area would occur in Q4 2039 or Q1 2039, during the bat hibernation period.

## **Appendix B-3**

### **Micron Campus Site Layout Alternatives**

### B-3 Micron Campus Site Layout Alternatives

In coordination with Micron, CPO and OCIDA considered a series of potential site layout alternatives for the proposed Micron Campus to determine whether a different layout of the fabs and supporting buildings from the Preferred Action Alternative site layout would result in fewer impacts to waterbodies on the WPCP. Specifically, six site layout alternatives were considered in addition to the Preferred Action Alternative. For the reasons explained below, CPO and OCIDA determined that none of the site layout alternatives besides the Preferred Action Alternative would be practicable because each would create inefficiencies that would prevent the Micron Campus from achieving the semiconductor wafer output necessary to achieve commercial viability.

In addition, CPO and OCIDA found that the Preferred Action Alternative would impact fewer Federal jurisdictional wetlands (190 acres) compared to other site layout alternatives, all of which would impact 200 acres or more of Federal jurisdictional wetlands.

Therefore, CPO and OCIDA determined that the Preferred Action Alternative site layout makes it the only alternative that meets CPO's purpose and need under NEPA and Micron's purpose and need under SEQRA (see Section 1.1) and did not carry the six other site layout alternatives forward for further analysis in the EIS.

Maximally efficient site layouts are critical to the successful operation of large-scale, multi-fab semiconductor manufacturing facilities such as the proposed Micron Campus manufacturing facility. These advanced facilities depend on the ability to minimize transport time for material traveling from one fab to another to maximize the utilization of extremely high-cost fab equipment. An AMHS (Figure B-8) is an integrated system of robots that travel along the ceilings of the fabs and across links between the fabs to transport wafers from one step of the manufacturing process to the next. Since there are limitations on the number of robot paths between fabs that can be built, site layout alternatives must carefully consider variations to entry and exit points from each fab to avoid unacceptable levels of robot congestion that could hamper facility productivity.

**Figure B-8 AMHS Example**



Source: Muratec Machinery, LTD. ([www.muratec.net/cfa/](http://www.muratec.net/cfa/))

Table B-3 on the next page further details key site layout criteria relevant to ensuring efficient semiconductor manufacturing facility operations.

**Table B-3 Site Layout Criteria**

| Criteria                                         | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|--------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| AMHS Cross-Fab Travel Time                       | This is the measure of time to transport material from one fab to another. Travel time would need to be minimized to maximize the utilization of the more than \$60 billion that Micron would need to spend on semiconductor manufacturing equipment, to ensure that wafer output is optimized as more materials are processed in less time.                                                                                                                                                                                                          |
| AMHS Risk of Overhead Transport (OHT) Congestion | Similar to roadways, the paths that AMHS robots take can become congested and there are limited paths that can be built. For the Micron Campus, any inefficient design of the entry and exit points from each fab would negatively affect cross-fab travel time and diminish Micron’s utilization of the more than \$60 billion estimated cost of fab equipment needed for the campus.                                                                                                                                                                |
| Utilities Layout and Routing                     | Semiconductor manufacturing uses a large variety and volume of chemicals, gases, and water. For the Micron Campus, air in the fabs would need to be conditioned to precise temperature and humidity ranges. Delivery of the chemicals, gases, water, and air needed for fab operations would require special support buildings (the central utilities buildings and hazardous process materials buildings located between the fabs). To minimize energy usage, the distances between these support buildings and the fabs would need to be minimized. |
| Construction Laydown Space                       | The Micron Campus would require a large area for contractor parking and storage of construction materials. Once the fabs would be built, the construction laydown area would still be needed due to continuous construction activities inside the fabs as they are retrofitted for new memory chip production technology nodes. The need for a large laydown area therefore operates as a constraint on efficient layouts.                                                                                                                            |
| Constructability                                 | Design of the fab buildings would only be feasible based on currently available construction means and methods, which also can operate as constraints on alternative layouts.                                                                                                                                                                                                                                                                                                                                                                         |
| Other                                            | Other requirements that can operate as constraints on alternative layouts include stormwater management, vibration specifications, and access points.                                                                                                                                                                                                                                                                                                                                                                                                 |

Source: Micron Technology.

Table B-4 below shows CPO’s and OCIDA’s application of the alternative evaluation criteria described in Section 2.2 and the site layout criteria in Table B-3 above to the Preferred Action Alternative and the six other site layout alternatives. Based on the below comparison, CPO and OCIDA found that none of the site layout alternatives besides the Preferred Action Alternative would meet purposes and needs or be technically or economically feasible or practicable, and all of them would result in either the same amount of permanent losses of Federal jurisdictional wetlands or the permanent loss of approximately 16-20 additional acres of Federal jurisdictional wetlands. Following Table B-4, Figure B-9 to Figure B-15 display each site layout alternative.

**Table B-4 Site Layout Alternative Analysis**

| <b>Layout</b>                                                                                   | <b>Meets Alternative Evaluation Criteria?</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <b>Wetland / Surface Water Losses<sup>10</sup></b> |
|-------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|
| Site Layout Alternative 1 (Preferred Action Alternative)                                        | Yes. Would meet purposes and needs; would be technically and economically feasible and practicable; would result in fewer permanent losses of wetlands compared to other site layout alternatives.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 184.47 acres / 6,283 LF                            |
| Site Layout Alternative 2 (similar to 1 but requires underground parking garages)               | <p>No. Would not meet purposes and needs because:</p> <ul style="list-style-type: none"> <li>• Layout would reduce wafer output per week (WOPW)<sup>11</sup> due to bottlenecks and inefficiencies from underground parking (limited underground access and garage congestion, longer employee garage to workstation travel times, and longer fab material, equipment, and maintenance delivery times would all affect production process efficiency).</li> </ul> <p>Would not be technically or economically feasible or practicable because:</p> <ul style="list-style-type: none"> <li>• Parking garages could not be constructed underground due to high water table and prohibitive amount of near-grade bedrock.</li> </ul> <p>Would not result in permanent losses of wetland or surface water features compared to the Preferred Action Alternative.</p> | 184.47 acres / 6,283 LF                            |
| Site Layout Alternative 3 (Fabs 2-4 shifted to southeast; requires underground parking garages) | <p>No. Would not meet purposes and needs because:</p> <ul style="list-style-type: none"> <li>• Layout would reduce WOPW by approximately 2 to 3 percent primarily due to longer delivery travel times between fabs.                             <ul style="list-style-type: none"> <li>○ Distance between fabs and non-linear connections between fabs would require AMHS robot turning and bending, causing bottlenecks, congestion, and increased robot travel times from Fabs 1-2 to Fabs 3-4.</li> <li>○ AMHS inefficiencies would reduce the amount of process tool sharing across fabs.</li> <li>○ Design would break up and thereby diminish efficiency of unified</li> </ul> </li> </ul>                                                                                                                                                                 | 204 acres / 5,701 LF                               |

<sup>10</sup> Figures represent losses of acres of Federal jurisdictional wetlands and linear feet (LF) of Federal jurisdictional surface water features. For additional information, see Section 3.3 (Water Resources).

<sup>11</sup> Unaddressed or unmanageable inefficiencies in memory chip production processes result in reductions in WOPW; even marginal reductions in WOPW result in significantly increased costs (see Appendix A-1).

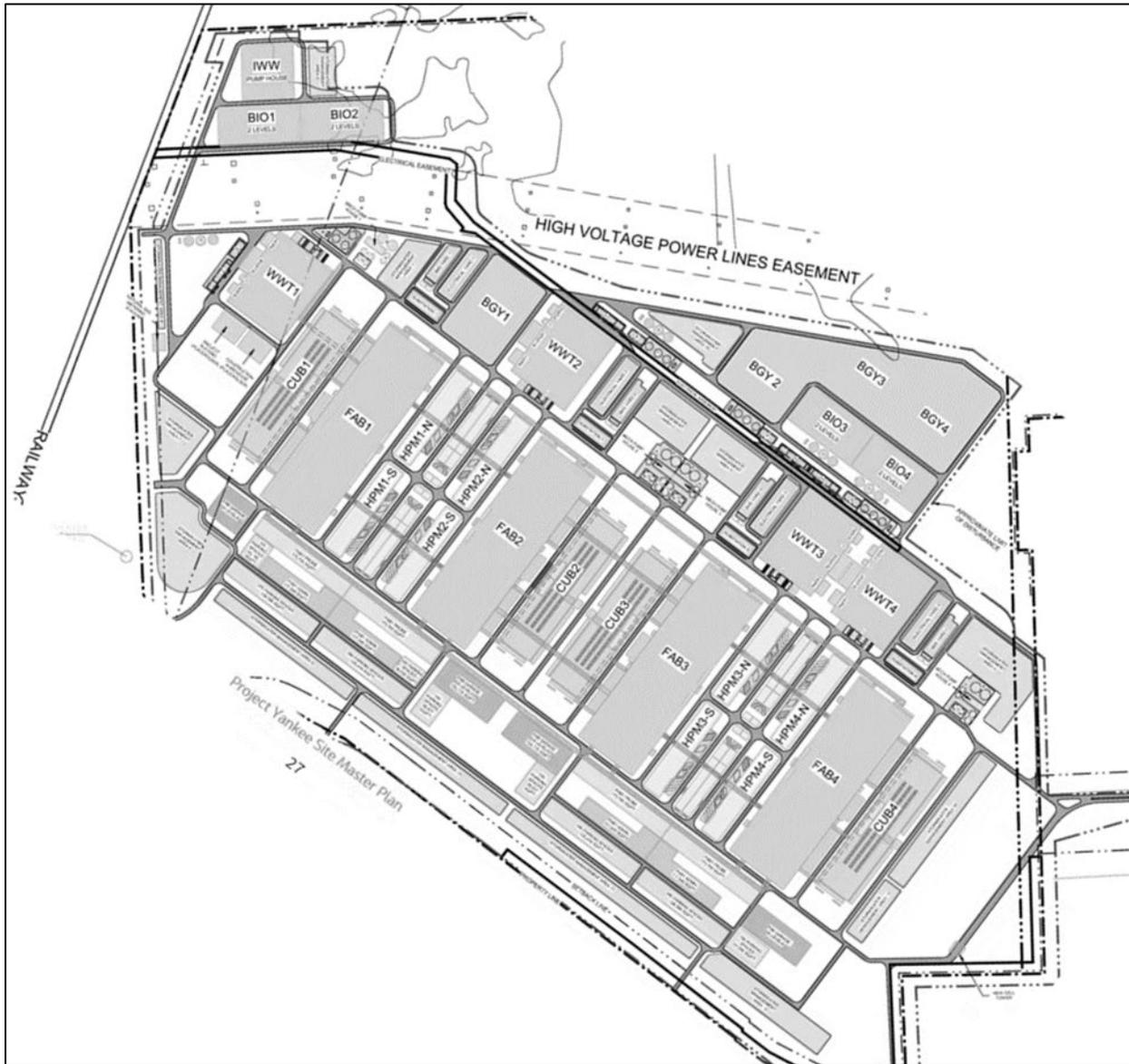
|                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                             |
|--------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|
|                                                                                                        | <p>probe building operations.</p> <ul style="list-style-type: none"> <li>○ Layout would cause bottlenecks and inefficiencies from underground parking garages.</li> </ul> <p>Would not be technically or economically feasible or practicable because:</p> <ul style="list-style-type: none"> <li>● Parking garages could not be constructed underground due to high water table and prohibitive amount of near-grade bedrock.</li> <li>● Layout would have insufficient construction laydown area for Fabs 3-4.</li> <li>● Fab 2 would be too far removed from industrial wastewater treatment.</li> <li>● Layout would result in insufficient stormwater management areas on the southwest side of the campus.</li> </ul> <p>Would result in permanent loss of approximately 20 additional acres of Federal jurisdictional wetlands compared to the Preferred Action Alternative.</p>                                                                                                                                                                                                                         |                             |
| <p>Site Layout Alternative 4 (Fabs 1-4 shifted to southeast; requires underground parking garages)</p> | <p>No. Would not meet purposes and needs because:</p> <ul style="list-style-type: none"> <li>● Layout would reduce WOPW due to bottlenecks and inefficiencies from underground parking.</li> </ul> <p>Would not be technically or economically feasible or practicable because:</p> <ul style="list-style-type: none"> <li>● Parking garages could not be constructed underground due to high water table and prohibitive amount of near-grade bedrock.</li> <li>● Layout would have insufficient construction laydown area for Fabs 3-4.</li> <li>● Layout would have insufficient space for projected utility needs.</li> <li>● Layout would result in insufficient stormwater management area allocations across the campus, necessitating construction of underground stormwater holding tanks with mechanical pumps, which would result in decreased energy efficiency, increased risks of mechanical failure, and increased costs.</li> </ul> <p>Would result in permanent loss of approximately 16 additional acres of Federal jurisdictional wetlands compared to the Preferred Action Alternative.</p> | <p>200 acres / 5,902 LF</p> |
| <p>Site Layout Alternative 5 (Fabs 3-4 shifted to southeast; requires underground parking garages)</p> | <p>No. Would not meet purposes and needs because:</p> <ul style="list-style-type: none"> <li>● Layout would reduce WOPW primarily due to longer delivery travel times between fabs. <ul style="list-style-type: none"> <li>○ Distance between fabs and non-linear connections between fabs would require AMHS robot turning and bending, causing</li> </ul> </li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | <p>204 acres / 5,701 LF</p> |

|                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                             |
|--------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|
|                                                                                                        | <p>bottlenecks, congestion, and increased robot travel times.</p> <ul style="list-style-type: none"> <li>○ AMHS inefficiencies would reduce the amount of process tool sharing across fabs.</li> <li>○ Design would break up and thereby diminish efficiency of unified probe building operations.</li> <li>○ Layout would cause bottlenecks and inefficiencies from underground parking garages.</li> </ul> <p>Would not be technically or economically feasible or practicable because:</p> <ul style="list-style-type: none"> <li>● Parking garages could not be constructed underground due to high water table and prohibitive amount of near-grade bedrock.</li> <li>● Layout would have insufficient construction laydown area for Fabs 3-4.</li> <li>● Layout would result in insufficient stormwater management areas on the southwest side of the campus.</li> </ul> <p>Would results in permanent loss of approximately 20 additional acres of Federal jurisdictional wetlands compared to the Preferred Action Alternative.</p>                                                                                                                                                                                   |                             |
| <p>Site Layout Alternative 6 (Fabs 3-4 rotated horizontally; requires underground parking garages)</p> | <p>No. Would not meet purposes and needs because:</p> <ul style="list-style-type: none"> <li>● Layout would reduce WOPW primarily due to longer delivery travel times between fabs. <ul style="list-style-type: none"> <li>○ Orientation of fabs and distance and non-linear connections between fabs would require AMHS robot turning and bending, causing bottlenecks, congestion, and increased robot travel times; layout would necessitate additional AMHS construction for approximately \$150 million in additional capital expenditure.</li> <li>○ Non-linear fab alignment would essentially eliminate useful cross-fab transportation connections (which also would increase capital and operating expenditures).</li> <li>○ Tool sharing across fabs would be eliminated.</li> <li>○ Design would break up and thereby diminish efficiency of unified probe building operations.</li> <li>○ Layout would cause bottlenecks and inefficiencies from underground parking garages.</li> </ul> </li> </ul> <p>Would not be technically or economically feasible or practicable because:</p> <ul style="list-style-type: none"> <li>● Parking garages could not be constructed underground due to high water</li> </ul> | <p>204 acres / 5,701 LF</p> |

|                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                             |
|--------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|
|                                                                                                        | <p>table and prohibitive amount of near-grade bedrock.</p> <ul style="list-style-type: none"> <li>• Layout would have insufficient construction laydown area for Fabs 3-4.</li> <li>• Layout would result in insufficient stormwater management areas on the southwest side of the campus.</li> </ul> <p>Would results in permanent loss of approximately 20 additional acres of Federal jurisdictional wetlands compared to the Preferred Action Alternative.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                             |
| <p>Site Layout Alternative 7 (Fabs 2-3 rotated horizontally; requires underground parking garages)</p> | <p>No. Would not meet purposes and needs because:</p> <ul style="list-style-type: none"> <li>• Layout would reduce WOPW primarily due to longer delivery travel times between fabs. <ul style="list-style-type: none"> <li>○ Orientation of fabs and distance and non-linear connections between fabs would require AMHS robot turning and bending, causing bottlenecks, congestion, and increased robot travel times.</li> <li>○ Non-linear fab alignment would essentially eliminate useful cross-fab transportation connections (which also would increase capital and operating expenditures).</li> <li>○ Tool sharing across fabs would be eliminated.</li> <li>○ Design would break up and thereby diminish efficiency of unified probe building operations.</li> <li>○ Layout would cause bottlenecks and inefficiencies from underground parking garages.</li> </ul> </li> </ul> <p>Would not be technically or economically feasible or practicable because:</p> <ul style="list-style-type: none"> <li>• Parking garages could not be constructed underground due to high water table and prohibitive amount of near-grade bedrock.</li> </ul> <p>Would result in permanent loss of approximately 20 additional acres of Federal jurisdictional wetlands compared to the Preferred Action Alternative.</p> | <p>204 acres / 5,701 LF</p> |

Source: Micron Technology.

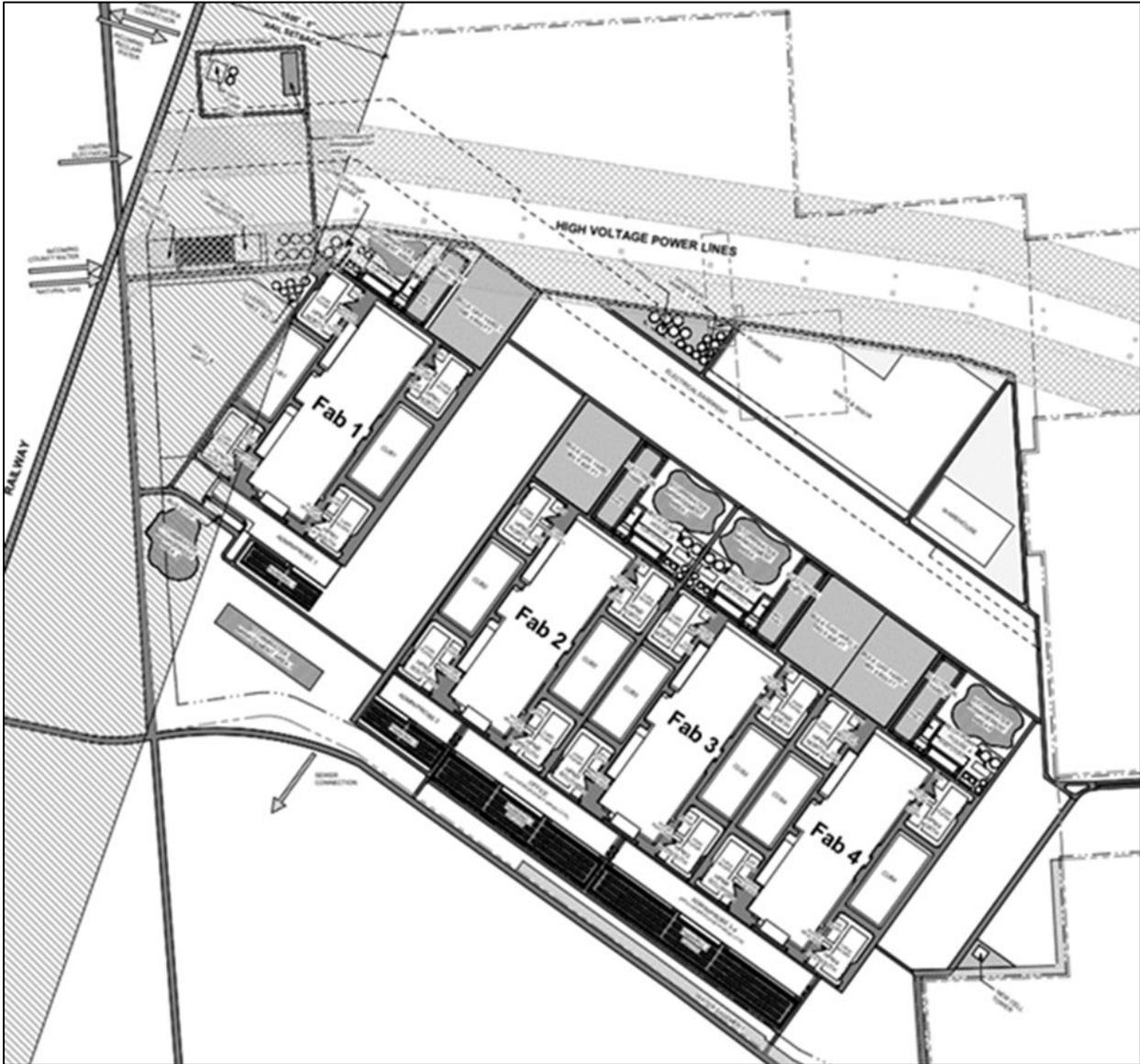
**Figure B-9 Site Layout Alternative 1  
(Preferred Action Alternative)**



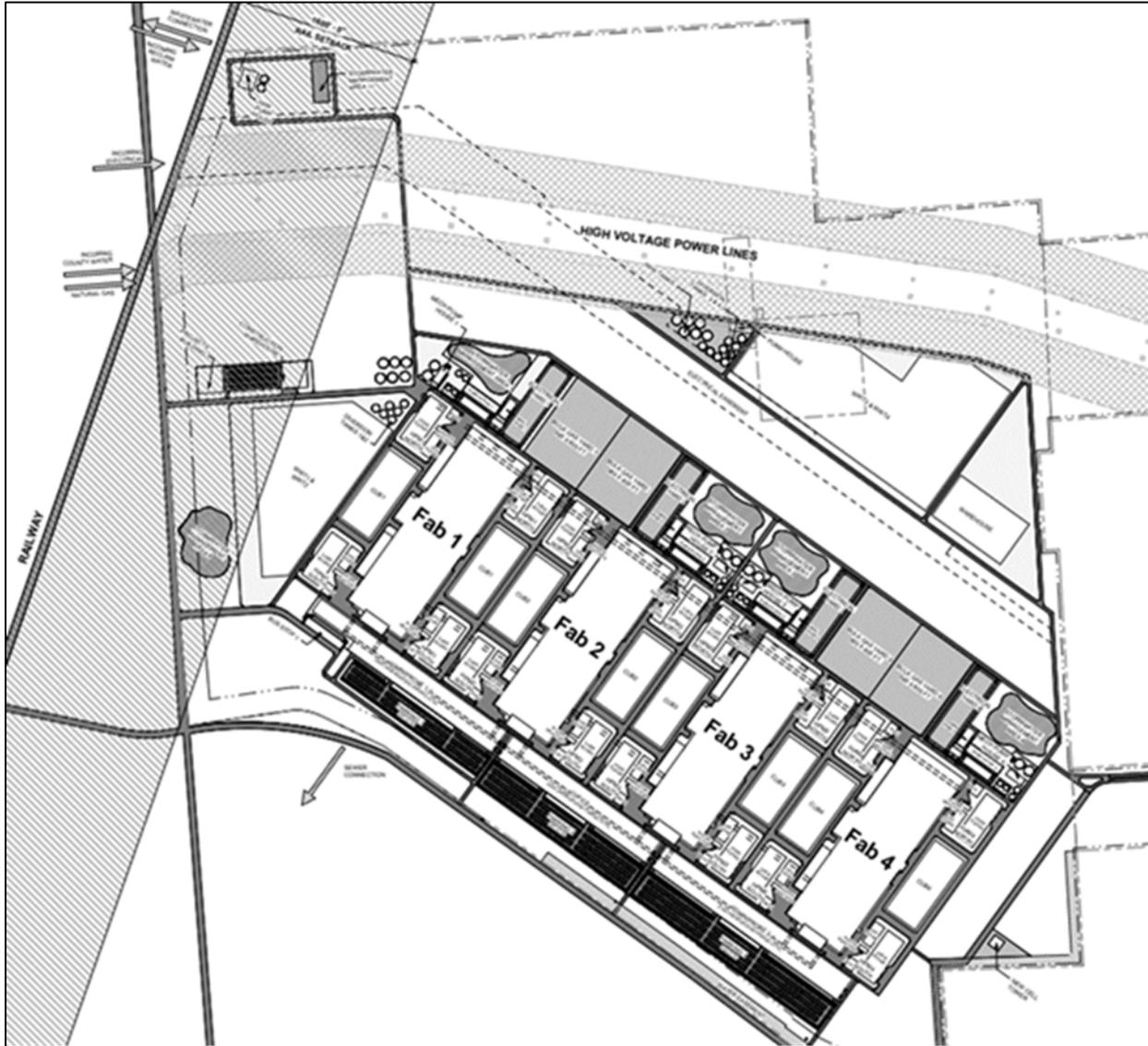
**Figure B-10 Site Layout Alternative 2  
(similar to 1 but requires underground parking garages)**



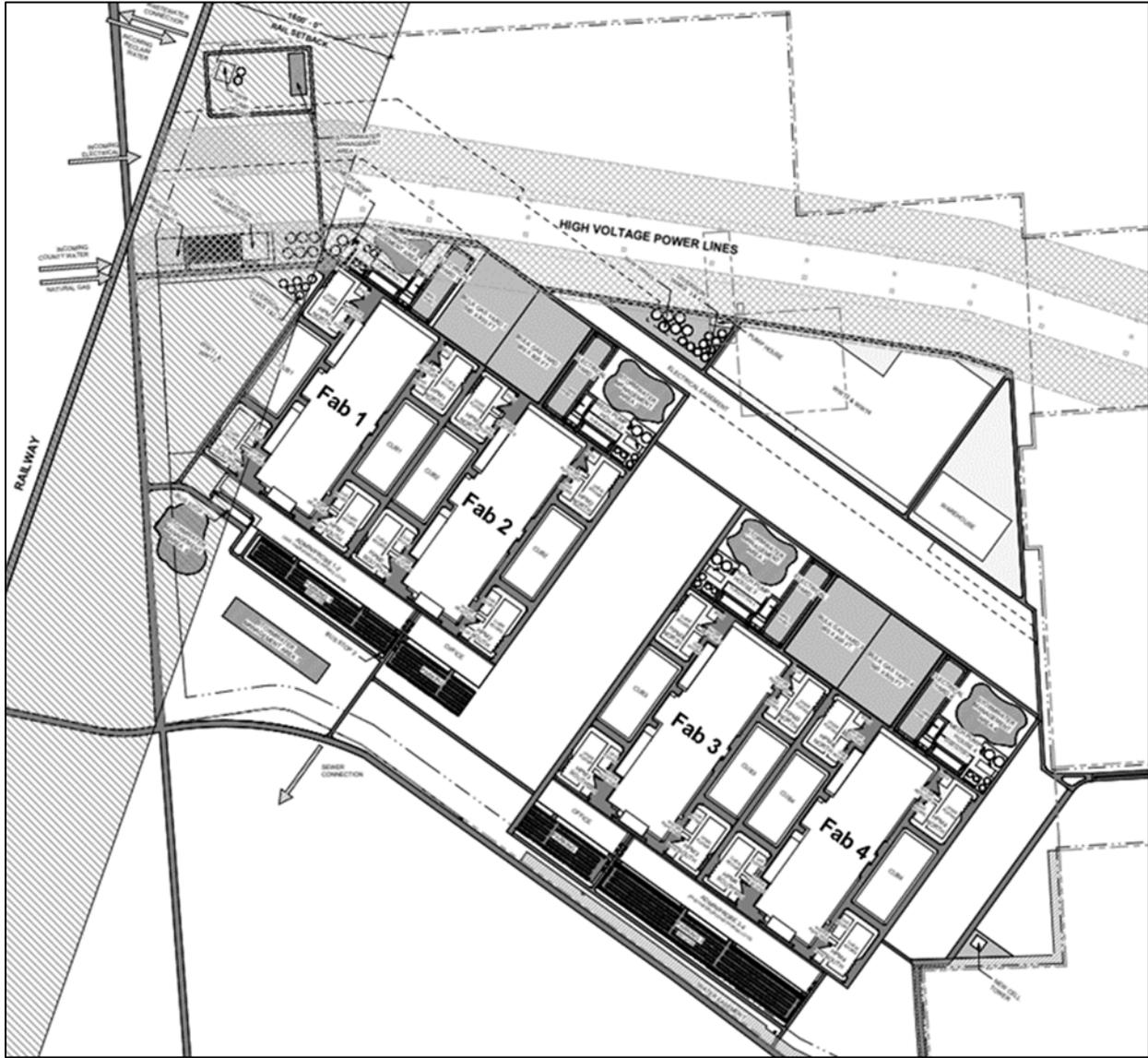
**Figure B-11 Site Layout Alternative 3  
(Fabs 2-4 shifted to southeast; requires underground parking garages)**



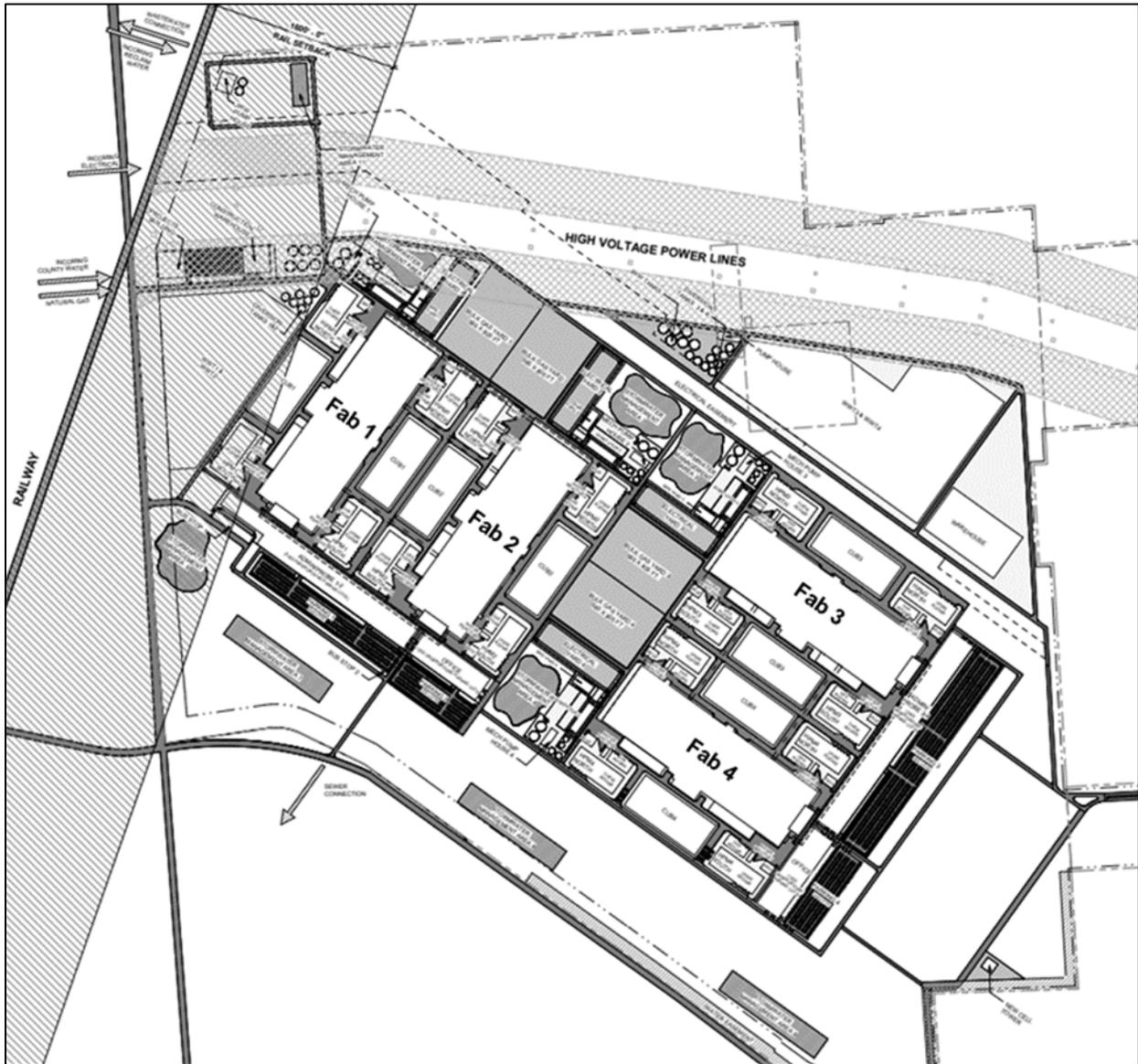
**Figure B-12 Site Layout Alternative 4  
(Fabs 1-4 shifted to southeast; requires underground parking garages)**



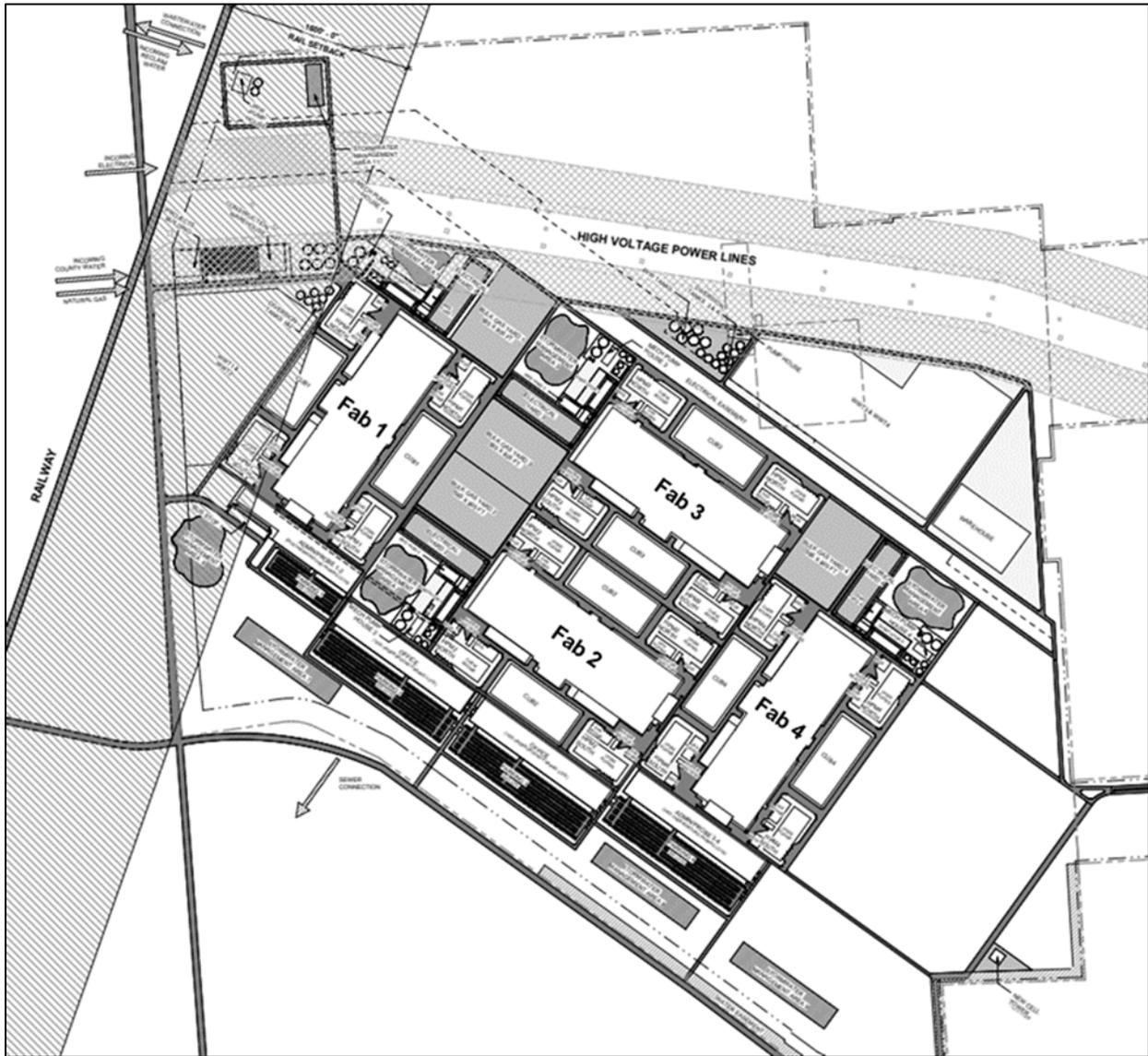
**Figure B-13 Site Layout Alternative 5  
(Fabs 3-4 shifted to southeast; requires underground parking garages)**



**Figure B-14 Site Layout Alternative 6  
(Fabs 3-4 rotated horizontally; requires underground parking garages)**



**Figure B-15 Site Layout Alternative 7  
(Fabs 2-3 rotated horizontally; requires underground parking garages)**



## **Appendix B-4 Micron Campus Parking Space Needs**

## **B-4 Micron Campus Parking Space Needs**

The proposed Micron Campus would include a total of 11,600 above-ground parking spaces, divided between four 500-space surface parking lots located south of the administration and probe buildings, and four 2,400-space structured parking areas (see Figure 2.1-5). As outlined below, the design of the campus includes this number of parking spaces to accommodate the anticipated peak headcount for full-time employees, construction workers, general visitors, and visitors to large on-site events, while also factoring in considerations for snow storage.

### **Workforce Parking**

As discussed in Section 2.1.1.6, at full production in 2045, the Micron Campus would support a full-time employee peak headcount of 9,005 workers, along with 300 construction workers who will remain on-site for ongoing refinements. Parking spaces would be allocated to ensure that every full-time employee and construction worker has access to on-site parking and to accommodate shift overlap. This overlap would be necessary to allow for a pass-down period between shifts, during which both incoming and outgoing shift vehicles would be parked simultaneously. Overall, this parking allocation would be necessary to maintain a smooth flow of traffic within the property.

### **General Visitor Parking**

In addition to parking for employees and construction workers, Micron anticipates a regular flow of visitors. Approximately 400 parking spaces would be allocated to visitors to ensure safe visitor access to the campus. This allocation would minimize disruptions to employee parking areas and day-to-day operations.

### **Large Event Parking**

Micron anticipates the need to occasionally host large events that would require additional visitor parking. Approximately 800 parking spaces would be allocated to accommodate peak anticipated attendance during these events. These spaces would be necessary to ensure that large groups can park on-site and safely access the campus. Micron would plan for these events in advance to avoid potential congestion or parking shortages.

### **Snow Storage**

Given the climate in New York State, snow storage is an essential element of parking lot design. Approximately 1,100 spaces, representing 25 percent of the surface parking lots and the top level of the structured parking areas, would be allocated to snow storage during the winter months. Adequate snow storage space would be necessary to manage snow accumulation without interfering with the availability of parking spaces, and would ensure that snow removal would not impede traffic flow or create hazards for employees or visitors.

**Appendix B-5**  
**Revised Proposed Project Construction Schedule**  
**Details and Impact Analysis**

## **B-5 Revised Proposed Project Construction Schedule Details and Impact Analysis Review**

### **B-5.1 Revised Construction Schedule**

As described in Section 2.3, Micron could revise the construction schedule and commencement of construction for each fab as well as the Child Care Site, compared to what is currently presented in the FEIS. A detailed description of the potential revisions to the construction schedule is provided in the tables below. The following tables and graphs present the possible revised construction schedules for each component of the Proposed Project and Connected actions as well as a graphical comparison between the DEIS timing and the potential revised construction and commencement of operations schedule.

Under the revised construction schedule, Micron would still mobilize for initial site preparation beginning in the fourth quarter of 2025, including commencement of tree clearing, just as it would have under the timeline presented in the DEIS. However, the initiation of construction of Fabs 1 and 2 would be later, with each being constructed over a longer period of time. Specifically, construction of Fab 1, which previously was anticipated to begin following tree clearing in Q4 of 2025 and end at the end of Q2 2028, would, under the revised construction schedule, begin in Q2 of 2026 and extend to Q3 2030, whereupon operations of Fab 1 would begin. Under the revised construction schedule, construction of Fab 2 would begin in Q4 of 2030 and end in Q4 of 2033, instead of beginning in Q3 2028 and ending in Q4 2030 as contemplated in the DEIS. See Table B-5.

Because the revised construction schedule for Fabs 1 and 2 would push back the arrival of operational workers at the Micron Campus (See Figure B-16), initiation of construction at the Childcare Site would change from 2026 to 2028 for the childcare center, and from 2030 to 2032 for the healthcare and recreation centers. Securing warehouse space also would be changed to November 2028 because initiation of wafer production would occur later in time. Finally, the initiation of construction of Fab 3 would be changed from Q3 2033 to Q3 2035 and Fab 4 would be delayed by one calendar quarter. Despite these potential construction schedule changes, final construction on the Micron Campus (including Fab 4) would still be completed in 2041 as discussed in the DEIS and ramp up to full four-fab production would still occur by the end of 2045.

The construction schedule for the Connected Actions would also change to meet the utility needs of the Proposed Project, which would occur at different times under the potential revised construction schedule than discussed in the DEIS. As illustrated in the tables below, construction of the electrical, natural gas, freshwater, industrial wastewater, sanitary wastewater, and telecommunications-related connected actions all would be postponed and/or implemented over a longer period of time if Micron elects to move forward under the revised construction schedule scenario. See Figure B-17 and B-18. Finally, under a revised construction schedule, the interim bridging project that was discussed in the DEIS and would have been necessary to handle industrial wastewater flows from the Micron Campus while OCDWEP constructed the new IWWTP, would no longer be necessary. See DEIS Section 2.1.8.2.

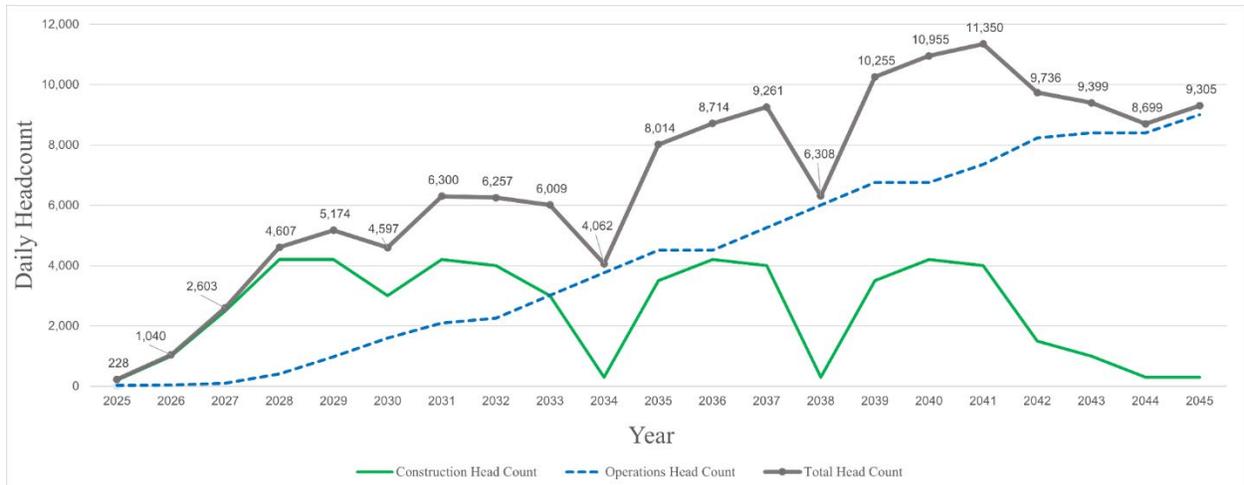
For more detailed information about the potential revised construction schedule, and a side-by-side comparison of these potential construction schedule changes and the construction schedule analyzed in the DEIS, see Table B-5 and Figures B-16 through B-18 below.

**Table B-5 Potential Revised Micron Campus Fab Construction Schedule**

| Phase    | Fab   | Tree Clearing | Construction Start | Ready for Equipment | Building Construction End | Operations Start |
|----------|-------|---------------|--------------------|---------------------|---------------------------|------------------|
| Phase 1A | Fab 1 | Q1 2026       | Q2 2026            | Q2 2030             | Q3 2030                   | Q3 2030          |
| Phase 1B | Fab 2 | Q4 2030       | Q4 2030            | Q3 2033             | Q4 2033                   | Q4 2033          |
| Phase 2A | Fab 3 | Q1 2035       | Q3 2035            | Q2 2037             | Q3 2037                   | Q3 2037          |
| Phase 2B | Fab 4 | Q1 2039       | Q3 2039            | Q3 2041             | Q4 2041                   | Q4 2041          |

Source: Micron Technology (n.d.). Note: Fab 4 building construction would end in Q4 2041 and ramp up to full production by 2045.

**Figure B-16 Potential Revised Project On-Site Construction, Operation, and Total Headcount (2025-2045)**



Source: Micron Technology (n.d.). Note: Although Fab 4 construction would end in Q4 2041, Fabs 3 and 4 would not ramp up to full production until 2045.

**Figure B-17 Potential Revised Proposed Project and Connected Actions Construction Timeline**



Sources: Micron Technology (n.d.); National Grid (n.d.); OCWA (n.d.); OCDWEP (n.d.).

Note: Phases 1 and 2 of the OCWA improvements and Stages 1 and 2 of the OCDWEP improvements would be timed to serve Phase 1 (Fabs 1-2) and Phase 2 (Fabs 3-4) of the Micron Campus. The Warehouse Site is not shown but Micron would anticipate leasing warehouse space for a 7-10-year term beginning in November 2028.

**Figure B-18 Comparison of DEIS Construction Timeline and Potential Revised Construction Timelines**



Sources: Micron Technology (n.d.); National Grid (n.d.); OCWA (n.d.); OCDWEP (n.d.).  
 Note: Solid bars represent construction timeline in DEIS; striped bars represent revised construction timeline

## **B-5.2 Potential Revised Construction Schedule Impact Analysis**

The potential construction schedule revisions are not anticipated to materially change the reasonably foreseeable effects that were described in the DEIS for the Proposed Project and Connected Actions, or alter the significance of those effects. As a result, no changes were made to the assessment of environmental effects in Chapters 3 and 4 of the FEIS.

Table B-6 below provides a resource-by-resource assessment of how the potential construction schedule change might alter the intensity of environmental effects associated with the Proposed Project and Connected Actions. This assessment concluded that the potential construction schedule changes would either have no effect on, or slightly lessen, the environmental effects that otherwise would be associated with the Proposed Project and Connected Actions. As explained in the table, this is primarily because the potential construction schedule changes generally would reduce the intensity of development during the initial stages of Proposed Project implementation, while preserving the overall Proposed Project construction period. This is particularly the case for transportation-related effects under the revised construction schedule, which are further analyzed in the traffic technical memorandum (See Appendix B-6), which shows a less acute effect on traffic due to longer ramp-up periods for Fabs 1 and 2, and allows more time for NYSDOT and other authorities to implement traffic improvements to handle the traffic increase associated with the Proposed Project. Reduction in short-term traffic impacts also would reduce other effects associated with traffic, such as noise and air pollution. See Table B-6 and Appendix B-6.

As explained in Table B-6, though impacts to some resource areas would be slightly altered, the potential revisions to the construction schedule would not materially change the anticipated environmental effects associated with the Proposed Project and Connected Actions, or affect the significance of the impacts that the Proposed Project and Connected Actions would have on any environmental resource.

**Table B-6 Impact of Potential Revised Project Construction Timeline on Anticipated Environmental Effects**

| Resource Area                       | Material Change to Impacts Associated with Construction? | Material Change to Impacts Associated with Operations? | Explanation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|-------------------------------------|----------------------------------------------------------|--------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Land Use, Zoning, and Public Policy | No                                                       | No                                                     | The revised timeline would not affect the geographic scope, nature, or extent of the land use changes that would be associated with the Proposed Project and Connected Actions. The revised timeline would only affect the timing of these changes, which would not alter the effects on Land Use, Zoning, and Public Policy analyzed in the DEIS.                                                                                                                                                                                                                             |
| Geology, Soils, and Topography      | No                                                       | No                                                     | The revised timeline would not affect the geographic scope, nature, or extent of the land use changes that would be associated with the Proposed Project and Connected Actions. The revised timeline would only affect the timing of these changes, which would not alter the effects on Geology, Soils, and Topography analyzed in the DEIS.                                                                                                                                                                                                                                  |
| Water Resources                     | No; slightly reduces anticipated effects                 | No                                                     | The revised timeline would result in a slower construction pace during the construction of Fabs 1 and 2. This would modestly reduce the immediacy and intensity of many of the short-term impacts associated with the early phases of construction (e.g., soil runoff, potential for construction equipment spills). There are no proposed changes to the remainder of the construction schedule and long-term impacts for water resources that would result in additional effects.                                                                                            |
| Biological Resources                | No                                                       | No; changes effects duration                           | The revised timeline would increase the time during which Fabs 1 and 2 would be constructed. This revised timeline would extend the period under which wildlife expected to occur in remaining habitats during the construction period, including aquatic biota and threatened and endangered species, would be exposed to lighting and noise disturbances associated with the construction. However, this exposure would be anticipated to be at a lower intensity than previously considered. As a result, the revised timeline would not change the conclusions in the DEIS |

| Resource Area                                                    | Material Change to Impacts Associated with Construction? | Material Change to Impacts Associated with Operations? | Explanation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|------------------------------------------------------------------|----------------------------------------------------------|--------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                  |                                                          |                                                        | <p>with respect to the degree of impacts to biological resources during construction.</p> <p>The remaining changes to the construction schedule would not have any different effect on biological resources than those disclosed in the DEIS.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| Historic and Cultural Resources                                  | No                                                       | No                                                     | <p>The revised timeline would not affect the geographic scope, nature, or extent of the land use changes that would be associated with the Proposed Project and Connected Actions. The revised timeline would only affect the timing of these changes, which would not alter the effects of on Historic and Cultural Resources analyzed in the DEIS.</p>                                                                                                                                                                                                                                                                                                                                                                          |
| Air Quality                                                      | No; slightly reduces anticipated effects                 | No                                                     | <p>The revised timeline would increase the time during which Fabs 1 and 2 would be constructed, and, therefore, would reduce the intensity of construction-related emissions over that time. The remainder of the construction schedule would be unaffected. Therefore, the revised timeline would modestly reduce construction-related air quality impacts. The revised timeline delays, but does not affect, the intensity of impacts from the startup and operation of the Proposed Project as analyzed in the DEIS.</p> <p>Further, given the reduction in construction intensity and overall traffic effects, traffic-generated mobile air emissions impacts would also be the same or better under a modified schedule.</p> |
| Greenhouse Gas Emissions, Climate Change, and Climate Resiliency | No                                                       | No                                                     | <p>The revised timeline would not affect the GHG emissions, Climate Change, or Climate Resiliency related effects of the Preferred Action Alternative.</p> <p>The revised timeline would increase the time during which Fabs 1 and 2 would be constructed, and, therefore, would reduce the intensity of construction-related GHG emissions over that time. The remainder of the construction schedule would be unaffected. Therefore, the revised timeline would modestly reduce the</p>                                                                                                                                                                                                                                         |

| Resource Area                                         | Material Change to Impacts Associated with Construction? | Material Change to Impacts Associated with Operations? | Explanation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|-------------------------------------------------------|----------------------------------------------------------|--------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                       |                                                          |                                                        | <p>intensity of GHG emissions associated with construction, but would not affect overall construction GHG emissions, which would still have the same climate related effects described in the DEIS. The revised timeline delays, but does not affect, the intensity of GHG/climate related impacts from the startup and operation of the Proposed Project.</p> <p>The revised timeline would not affect Proposed Project location, design, or operation, and will not affect the climate resiliency attributes analyzed in the DEIS.</p>                                                                                                                                                                                                                                                                                                        |
| Solid Waste, Hazardous Waste, and Hazardous Materials | No; slightly reduces anticipated effects                 | No                                                     | <p>The revised timeline would increase the time during which Fabs 1 and 2 would be constructed, and, therefore, would push back and reduce the intensity of generation of solid waste over that time. Generation of hazardous waste and use of hazardous materials during construction is anticipated to be minimal; therefore, the revised timeline, if anything, would only serve to further reduce the intensity of generation of hazardous waste or use hazardous materials during construction for Fabs 1 and 2. The remainder of the construction schedule would be unaffected. Therefore, the revised timeline would modestly reduce construction-related solid waste generation impacts. The revised timeline does not affect the intensity of impacts from the startup and operation of the Proposed Project analyzed in the DEIS.</p> |
| Human Health and Safety                               | No                                                       | No                                                     | <p>The revised timeline would not materially affect human health and safety at the Proposed Project; slower construction schedules for Fabs 1 and 2 may reduce peak on-site workers during this period, which may result in a minor reduction of risk to workers at the Micron Campus during this time. The revised timeline would not affect the analysis in the DEIS on human health and safety associated with operating the Proposed Project.</p>                                                                                                                                                                                                                                                                                                                                                                                           |

| Resource Area                           | Material Change to Impacts Associated with Construction? | Material Change to Impacts Associated with Operations? | Explanation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|-----------------------------------------|----------------------------------------------------------|--------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Utilities and Supporting Infrastructure | No                                                       | No; possible slight decrease in anticipated effects    | Overall utility demands associated with implementing the Preferred Action Alternative would remain unchanged under the revised Proposed Project construction timeline. The only change would be the dates on which Proposed Project-related utility demand would occur. A potential delay will provide additional time for the various utility providers (including gas, electricity, freshwater supply, wastewater and broadband services) and utility planning entities to prepare for Proposed Project-related and induced growth increases in demand. Accordingly, the effects of the revised timeline on utilities likely would be slightly reduced from that analyzed in the DEIS.                                                                                                                       |
| Transportation and Traffic              | No; slightly reduces anticipated effects                 | No; slightly reduces anticipated effects               | The revised timeline reflects a longer, less intensive commencement of the construction period, reducing peak-hour traffic. It also would enable the implementation of recommended mitigation measures prior to Fab 1 and 2 related traffic volumes that were not feasible under the Preferred Action Alternative. The revised timeline would result in a reduction of significant adverse traffic impacts and no new significant adverse impacts, as presented in a traffic technical memo (see Appendix B-6), though it would not reduce the impacts disclosed and analyzed in the DEIS below the level of significance. Given the reduction in construction intensity and overall traffic effects, no new traffic impacts are anticipated. See Appendix B-6, traffic technical memo for additional details. |
| Noise and Vibration                     | No                                                       | No                                                     | The revised timeline would increase the time it would take to complete Fabs 1 and 2 and, therefore would reduce the anticipated overlapping peak intensity of construction-related noise associated with those Fabs compared to the Preferred Action Alternative. The analysis would be anticipated to remain unchanged for Fabs 3 and 4.                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |

| Resource Area                          | Material Change to Impacts Associated with Construction? | Material Change to Impacts Associated with Operations? | Explanation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|----------------------------------------|----------------------------------------------------------|--------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                        |                                                          |                                                        | <p>Construction-related peak vibration levels, which are below impact thresholds under the Preferred Action Alternative, are not expected to change. Additionally, the traffic technical memo indicates that the longer construction period is expected to reduce peak-hour traffic volumes associated with construction of Fabs 1 and 2 and, therefore, should result in lower traffic noise exposure levels of longer duration than those levels under the Preferred Action Alternative. Although the peak noise levels would be lower, they would not necessarily be below significance levels. Accordingly, the total combined effects of construction noise plus traffic noise plus operational noise will not be perceptibly different from those levels described in the DEIS, and recommended noise mitigation measures associated with construction and operations would remain unchanged.</p> <p>Further, given the reduction in construction intensity and overall traffic effects, traffic-generated noise impacts would also be the same or better under a modified schedule.</p> |
| Visual Effects and Community Character | No                                                       | No                                                     | <p>The revised timeline would not affect the geographic scope, nature, or extent of the land use changes, and, therefore, the analysis of visual or community character changes in the DEIS would not change. While the pace of construction of Fabs 1 and 2 would be slower than assumed in the DEIS, the overall construction period would not change. Construction and operation of the Micron Campus and Rail Spur Site would continue to be highly visible from certain surrounding areas and would produce noticeable visual effects from multiple viewpoints. There would be no significant aesthetic impacts on any designated aesthetic resources in range of the Proposed Project or Connected Actions. The Proposed Project would continue to result in changes to community character based on the combination of visual effects with other effects described in the FEIS, such as increased traffic and noise, and the effects of</p>                                                                                                                                             |

| Resource Area                                           | Material Change to Impacts Associated with Construction? | Material Change to Impacts Associated with Operations? | Explanation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|---------------------------------------------------------|----------------------------------------------------------|--------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                         |                                                          |                                                        | <p>induced growth. However, the revised timeline would reduce the intensity of construction-related effects during the time period when Fabs 1 and 2 are under construction. Overall, these changes would continue to be consistent with community character as expressed in local land use regulations, policies, and plans.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <p>Community Facilities, Open Space, and Recreation</p> | <p>No</p>                                                | <p>No</p>                                              | <p>The revised timeline would not materially affect the conclusions of the DEIS with respect to community facilities, open space, and recreation. Slower construction schedules for Fabs 1 and 2 may reduce peak on-site workers during this period, reducing the demand for police services, fire services, EMS, healthcare facilities. Increased student enrollment from induced growth associated with the construction and operation of Fabs 1 and 2 would be more gradual but would continue to bring increased economic activity and an expanded regional tax base capable of providing increased funding for school district budgets, facilities, and staffing. The revised timeline would not affect the conclusions of the DEIS with respect to open space and recreational resources. The induced residential growth would continue to contribute to property taxes and other fees that would support the maintenance of parks and recreational resources within the County. The potential significant adverse effects on volunteer fire services in the five-county region would continue, although the timing of these effects may be later. The proposed mitigation measures would not be affected by this change.</p> |
| <p>Socioeconomic Conditions</p>                         | <p>No; slightly reduces anticipated effects</p>          | <p>No</p>                                              | <p>The revised timeline would result in a slower construction pace in the early project period, reducing the immediacy and intensity of short-term demands on housing and construction labor and materials. This would enable local and regional markets to better respond to market changes, reducing the potential adverse effects associated with potential shortages in building material</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |

| Resource Area                            | Material Change to Impacts Associated with Construction? | Material Change to Impacts Associated with Operations? | Explanation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|------------------------------------------|----------------------------------------------------------|--------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                          |                                                          |                                                        | and labor supply; it would reduce, but not eliminate, nor reduce below significance levels, the reasonably foreseeable significant adverse short-term impacts on housing costs in the local study area.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| Environmental Justice                    | No; slightly reduces anticipated effects                 | No                                                     | As noted for the resource areas listed above, the revised timeline would not result in significant adverse impacts not already identified in the DEIS. Rather, it would modestly reduce the intensity of some construction effects, due to the slower pace of construction for Fabs 1 and 2. Therefore, the conclusions in the DEIS would be unaffected as the construction or operation of the Proposed Project or Connected Actions would not cause or increase a disproportionate burden on a DAC or a minority or low-income community, except the potential temporary adverse impact on housing and rent pricing, which would be reduced. As discussed in the DEIS, the Proposed Project would continue to produce the beneficial effects for the local and regional communities, including the identified DACs and minority and low-income communities. |
| Cumulative Effect on Each Resource Above | No                                                       | No                                                     | The revised timeline would not be anticipated to directly affect the construction of the reasonably foreseeable future projects identified in the Cumulative Effects Analysis. However, the slower pace of construction during the early stages of the Proposed Project would allow for more of the reasonably foreseeable future projects identified to be constructed. Many of the reasonably foreseeable future projects, particularly those associated with housing and transportation are anticipated to support the increased demands for transportation and housing capacity. As a result, the revised timeline would not be anticipated to result in increased cumulative effects relative to those already disclosed in the DEIS.                                                                                                                    |

**Appendix B-6**  
**Revised Traffic Modeling Technical Memorandum**

## Revised Traffic Modeling - Technical Memorandum

**Date:** October 29, 2025  
**Project name:** Traffic Impact Study – Modeling & Analysis – Micron New York Semiconductor Manufacturing, Clay, NY  
**Jacobs PN:** EBXH2201  
**Client name:** Micron Technology, Inc.  
**Prepared by:** Jacobs

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Since publication of the Draft Environmental Impact Statement (DEIS), CPO and Micron have amended their funding agreement. This amendment allows for modification of the timing within which Micron is required to commence operations of Fabs 1 and 2; which could lead to a different schedule than outlined in the DEIS. Although not included in the funding agreement, this potential modification could also delay the commencement of operation of Fab 3 while the commencement of operation of Fab 4 would remain largely unaffected. The potential modified schedule would allow for more gradual onboarding of the on-site construction workforce which would reduce peak head counts.

To assess the impacts of this potential schedule modification on the traffic impact study contained in the DEIS, Micron requested that its transportation consultant, Jacobs, model those potential changes and determine if they would result in any significant adverse traffic impacts<sup>1</sup> not previously addressed in the DEIS. To perform this review, the traffic analysis originally performed as part of the DEIS was revised to account for these potential changes to the construction and commencement of operations timeline. In addition, NYSDOT informed the modeling team of additional updates and a revision to the timing of certain mitigations available since the publication of the DEIS. The following sections provide more

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<sup>1</sup> As detailed in the DEIS, significantly impacted intersections and freeway segments were determined using a criterion with thresholds developed using the Highway Capacity Manual (HCM) as the baseline. To summarize, if operations (intersections or freeway segments) in the No Action Alternative are identified at the LOS levels A, B, C, or D and those same operations degrade to the LOS E or F identified in the Preferred Action Alternative, then the impact is significant. Additionally, if operations along a freeway segment in the No Action Alternative are identified at the LOS E level and those same operations degrade to LOS F identified in the Preferred Action Alternative, then the impact is significant. Similarly, if operations (intersections) in the No Action Alternative are identified at the LOS levels E or F and those same operations degrade to the LOS E or F with an increase in average delay of 5 seconds/vehicle or more in the Preferred Action Alternative, then the impact is significant. If operations (freeway segments) in the No Action Alternative are identified at the LOS levels F and those same operations degrade to the LOS F with a reduction in speed of 5 mph or more along a segment 500 feet or longer in the Preferred Action Alternative, then the impact is significant. These thresholds were established in collaboration with NYSDOT and align with those used in Environmental Impact Statements for other major sites across New York State.

detailed information regarding changes to the potential construction schedule, information provided by NYSDOT, and the potential impacts to the traffic analysis.

#### Potential Changes in Construction Intensity, Activities, and Schedule

- **Peak Construction Year Shift:** The peak headcount of the on-site construction workforce and operations staff for Fab 1 would shift from 2027 to 2029<sup>2</sup>.
- **Construction Worker Shuttle:** The traffic analysis review conservatively does not take credit for construction worker shuttle use after 2031, as the revised modeling indicates the construction worker shuttle may no longer be necessary after 2031 to address traffic impacts due to the expected completion of transportation improvements.
- **Workforce Shift Adjustments:** Shift schedules were revised to reduce peak-hour traffic volumes. The table below provides an example of these reductions for 2041 and further information is provided in the bullet point following the table.

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<sup>2</sup> The review of effects in 2031 and 2041 remains consistent with the DEIS as these continue to represent the final completion date for all recommended traffic mitigations and the maximum traffic/worker headcount timeframes.

**2041 Employee Vehicle Trips**

| Time Frame | FEIS (Proposed) |       |                               |     |                |       | DEIS           |       |               |     |                |       | Difference     |      |
|------------|-----------------|-------|-------------------------------|-----|----------------|-------|----------------|-------|---------------|-----|----------------|-------|----------------|------|
|            | Employee Trips  |       | Construction Worker Vehicles* |     | Total Vehicles |       | Employee Trips |       | Shuttle Buses |     | Total Vehicles |       | Total Vehicles |      |
|            | In              | Out   | In                            | Out | In             | Out   | In             | Out   | In            | Out | In             | Out   | In             | Out  |
| 6am-7am    | 0               | 0     | 775                           | 0   | 775            | 0     | 0              | 0     | 33            | 33  | 33             | 33    | 742            | -33  |
| 7am-8am    | 4,741           | 0     | 388                           | 0   | 5,128          | 0     | 5,312          | 0     | 17            | 17  | 5,329          | 17    | -201           | -17  |
| 4pm-5pm    | 0               | 0     | 0                             | 775 | 0              | 775   | 0              | 0     | 17            | 17  | 17             | 17    | -17            | 758  |
| 5pm-6pm    | 0               | 4,116 | 0                             | 388 | 0              | 4,504 | 0              | 4,612 | 33            | 33  | 33             | 4,645 | -33            | -141 |

\* Average occupancy of 1.72 considered for construction worker trips Source: 2022 NHTS and FDOT-2022 study

- Trip Generation Impacts:
  - Minor reductions compared to the DEIS due to revised construction timing and shift patterns.
  - Specific to 2041, slight increases anticipated during the 6 AM – 7 AM and 4 PM – 5 PM periods if shuttle is removed after 2031. However, the trip generation values during these hours are minor compared to the values for the other peak hours.
- Revised Traffic Analysis Scenarios:
  - 2029 (replacing 2027 due to revised maximum headcount associated with Fab 1): No Action Alternative, Preferred Action Alternative, and Partial Mitigation scenario (new scenario based on coordination with NYSDOT, more information provided in next section)
  - 2031: No Action Alternative, Preferred Action Alternative, and Mitigation Scenario C (same as DEIS)
  - 2041: No-Action Alternative, Action Alternative, and Mitigation Scenarios A, B, and C (same as DEIS)

### NYSDOT Requested Changes<sup>3</sup>

In addition to the aforementioned changes, NYSDOT has requested several intersection and network related modifications, primarily affecting the 2031 and 2041 forecast years, as well as the addition of the 2029 Partial Mitigation scenario:

- 2041 No Action Alternative & Preferred Action Alternative (without mitigation) – removal of:
  - Soule Road & Pepperidge Way Extension and NYS Route 481/NYS Route 31 Diverging Diamond Interchange (DDI). Note, the DDI is still included as part of Proposed Project’s mitigations in the 2031 Scenario C and 2041 Mitigation Scenarios A, B, and C.
  - Verplank Road and NYS Route 481 Interchange
- 2031 Mitigation Scenario C & 2041 Mitigation Scenarios A, B, and C – removal of:
  - Verplank Road & NYS 481 Interchange
- 2029 Partial Mitigation Scenario:

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<sup>3</sup> The changes to recommended mitigations were requested by the New York State Department of Transportation (NYSDOT) and its federal counterpart, the Federal Highway Administration, the agencies undertaking the separate design and environmental review process for the recommended mitigation presented in the DEIS that is currently underway. These changes in assumptions were introduced to confirm alignment with the required subsequent review of the transportation mitigations by these agencies.

- With the analysis year being shifted from 2027 to 2029, NYSDOT anticipates being able to complete some of the Mitigation Scenario C improvements by this time such that they would become an inherent component of all future year mitigation scenarios. These partial mitigations include a new interchange at I-81/Sneller Road and the widening of U.S. Route 11 from NYS Route 31 to Sneller Road (not in previously modeled (DEIS) 2027 scenarios).
- This scenario also includes future studies of temporary signals at five locations: (i) Van Hoesen Road and NYS Route 31, (ii) Stearns Road and NYS Route 31, (iii) Morgan Road and Verplank Road, (iv) Grange Road W and NYS Route 31, and (v) NYS Route 31 and Weller Canning Road.

### **Changes in Results**

While the revised modeling shows more severe No Action and Preferred Action impacts, due primarily to the removal of the NYS Route 481/ NYS Route 31 DDI from these scenarios, the mitigation scenarios (Scenario C in 2031 and 2041 as well as Partial Mitigation in 2029) demonstrate a reduction in the number of significantly impacted intersections and freeways for the Preferred Action Alternatives compared to the DEIS. This confirms that if the construction schedule is modified, including with the implementation of revisions and the recommended mitigations, the assessment in the DEIS of significant adverse impacts on traffic remains a conservative worst-case assessment. Details for specific changes between the DEIS and the revised traffic modeling are presented below and in Tables 1-3:

- Changes in 2029:
  - Background Growth and Delay: The modeling year change from 2027 to 2029 reflects additional background growth and reflects the impact of partially completed and completed roadway improvements undertaken independent of this project.
  - Results: The modeling reflected in the DEIS identified several significant adverse traffic impacts. All significant adverse impacts along freeway segments and most intersections would be eliminated through the potential change in construction schedule of Fabs 1 and 2. This potential change in schedule would enable the implementation of targeted mitigation measures, including roadway improvements and signalized access points, that previously could not be implemented by the prior 2027 peak scenario. Table 1 below provides a summary of the reduction in the effects from the DEIS analysis to the revised modeling for 2029 (previously 2027). Full effects and

details for all significantly affected freeway segments and intersections from both the DEIS and revised modeling are included as an attachment to this document.

- **Similar Results in 2031:** Similar to the DEIS, the revised modeling shows the Mitigation Scenario C improvements mitigate all significant adverse traffic impacts at intersection and freeway segment locations. Table 2 below provides a summary of significant adverse traffic impacts between the DEIS and revised modeling for 2031.
- **Changes in 2041:** At full build-out in 2041 with Mitigation C in place, only one intersection, U.S. Route 11 & NYS Route 31, is projected to remain significantly impacted due to geometric constraints that limit further mitigation, compared to five intersections identified in the DEIS. Table 3 below provides a summary of this reduction. Full effects and details for all significantly affected freeway segments and intersections from both the DEIS and revised modeling are included as an attachment to this document.
- **Continuous Coordination:** NYSDOT continues to provide input and support the traffic modeling review for the Proposed Project. Agency input has contributed to the latest modeling assumptions regarding current and planned roadway improvements within the Transportation Evaluation Area.

**Table 1. Comparison of Unmitigated/Partially Unmitigated Significant Adverse Impacts for Analysis Years 2027 (DEIS) and 2029 (Revised modeling)**

|               | DEIS                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Revised Modeling Update                                                                                                                        |
|---------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------|
|               | 2027 Significantly Impacted (Preferred Action Alternative <sup>1</sup> vs No Action)                                                                                                                                                                                                                                                                                                                                                                           | 2029 Significantly Impacted (Preferred Action Alternative with Mitigations vs No Action)                                                       |
| Freeways      | 1. I-81 NB Off-Ramp to NYS 31                                                                                                                                                                                                                                                                                                                                                                                                                                  | None                                                                                                                                           |
| Intersections | 1. NYS Route 31 and NYS Route 481 NB<br>2. Morgan Road and NYS Route 31*<br>3. U.S. Route 11 and NYS Route 31<br>4. Bear Road and NYS Route 481 EB On/Off-Ramp<br>5. NYS Route 481 WB On/Off-Ramp and Circle Drive E<br>6. U.S. Route 11 and Crabtree Lane<br>7. McNamara Drive/Driveway and NYS Route 31*<br>8. Doreen Avenue and NYS Route 31*<br>9. NYS Route 31 and Button Road*<br>10. Morgan Road and Verplank Road<br>11. NYS Route 31 and Oswego Road* | 1. Morgan Road and NYS Route 31*<br>2. Doreen Avenue and NYS Route 31*<br>3. NYS Route 31 and Button Road*<br>4. NYS Route 31 and Oswego Road* |

\*Significantly impacted in 2027 and 2029, <sup>1</sup> Per NYSDOT no mitigation feasible to implement by 2027 or 2029 Analysis Year; no mitigation scenario studied.

**Table 2. Comparison of Partially Unmitigated Significant Adverse Traffic Impacts for Analysis Year 2031 With Mitigation Scenarios**

|               | DEIS                                                                                     | Revised Modeling Update                                                                  |
|---------------|------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------|
|               | 2031 Significantly Impacted (Preferred Action Alternative with Mitigations vs No Action) | 2031 Significantly Impacted (Preferred Action Alternative with Mitigations vs No Action) |
| Freeways      | None                                                                                     | None                                                                                     |
| Intersections | None                                                                                     | None                                                                                     |

**Table 3. Comparison of Partially Unmitigated Significant Adverse Traffic Impacts for Analysis Year 2041 With Mitigation Scenario C**

|               | DEIS                                                                                                                                                                                                                                                                                  | Revised Modeling Update                                                                          |
|---------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|
|               | 2041 Significantly Impacted (Preferred Action Alternative with Mitigation Scenario C vs No Action)                                                                                                                                                                                    | 2041 Significantly Impacted (Preferred Action Alternative with Mitigation Scenario vs No Action) |
| Freeways      | None                                                                                                                                                                                                                                                                                  | None                                                                                             |
| Intersections | <ol style="list-style-type: none"> <li>1. NYS Route 31 and NYS Route 481 SB</li> <li>2. U.S. Route 11 and NYS Route 31*</li> <li>3. NYS Route 31 and I-81 SB Ramp</li> <li>4. Parking Lot/Lakeshore Road Spur and NYS Route 31</li> <li>5. South Bay Road and NYS Route 31</li> </ol> | <ol style="list-style-type: none"> <li>1. U.S. Route 11 and NYS Route 31*</li> </ol>             |

\*Significantly impacted in both DEIS and revised analysis

**Conclusion**

Based on results of the revised modeling, there would be no new freeway segments or intersections within the Transportation Evaluation Area that show significant adverse traffic impacts not previously identified in the DEIS. This confirms that the potential construction schedule and commencement of operation changes, associated shift changes, and NYSDOT’s updated assumptions, would not result in any additional significant adverse traffic impacts not previously addressed in the DEIS.

## Attachment

### Modeled Effects Tables

#### DEIS Modeling Analysis 2027 - Preferred Action

#### Intersections – Significantly Affected Only

| No. | Intersection Name                       | 2027 No Action  |     | 2027 Preferred Action |     | 2027 No Action  |     | 2027 Preferred Action |     |
|-----|-----------------------------------------|-----------------|-----|-----------------------|-----|-----------------|-----|-----------------------|-----|
|     |                                         | Delay (sec/veh) | LOS | Delay (sec/veh)       | LOS | Delay (sec/veh) | LOS | Delay (sec/veh)       | LOS |
|     |                                         | <b>6 AM</b>     |     | <b>6 AM</b>           |     | <b>7 AM</b>     |     | <b>7 AM</b>           |     |
| 1   | Bear Road & I-481 EB On/Off-Ramp        | 14              | B   | 100                   | F   | 16              | B   | 138                   | F   |
| 2   | I-481 WB On/Off-Ramp & Circle Drive E   | 18              | B   | 14                    | B   | 16              | B   | 75                    | E   |
| 3   | U.S. Route 11 & Crabtree Lane*          | 13              | B   | 12                    | B   | 28              | D   | 53                    | F   |
| 4   | McNamara Drive/Driveway & NYS Route 31* | 14              | B   | 15                    | C   | 22              | C   | 55                    | F   |
|     |                                         | <b>4 PM</b>     |     | <b>4 PM</b>           |     | <b>5 PM</b>     |     | <b>5 PM</b>           |     |
| 1   | NYS Route 31 & NYS Route 481 NB         | 46              | D   | 56                    | E   | 39              | D   | 44                    | D   |
| 2   | Morgan Road & NYS Route 31              | 43              | D   | 59                    | E   | 35              | C   | 58                    | E   |
| 3   | U.S. Route 11 & NYS Route 31            | 48              | D   | 57                    | E   | 41              | D   | 82                    | F   |
| 4   | McNamara Drive/Driveway & NYS Route 31* | >300            | F   | >300                  | F   | 216             | F   | >300                  | F   |
| 5   | U.S. Route 11 & Crabtree Lane*          | >300            | F   | >300                  | F   | >300            | F   | >300                  | F   |
| 6   | Doreen Avenue & NYS Route 31*           | 48              | E   | 54                    | F   | 33              | D   | 40                    | E   |
| 7   | NYS Route 31 & Button Road*             | 42              | E   | 45                    | E   | 30              | D   | 35                    | E   |
| 8   | Morgan Road & Verplank Road*            | 32              | D   | 42                    | E   | 27              | D   | 36                    | E   |
| 9   | NYS Route 31 & Oswego Road              | 50              | D   | 58                    | E   | 43              | D   | 50                    | D   |

\* Unsignalized Intersections

\*\* New Intersections in the Preferred Action Alternative

**Freeway Segments – Significantly Affected Only**

| Segment Direction | Segment Description              | Segment Type | 2027 No Action   |     |                  |     | 2027 Preferred Action |     |                  |     |
|-------------------|----------------------------------|--------------|------------------|-----|------------------|-----|-----------------------|-----|------------------|-----|
|                   |                                  |              | Density pc/mi/ln | LOS | Density pc/mi/ln | LOS | Density pc/mi/ln      | LOS | Density pc/mi/ln | LOS |
|                   |                                  |              | 6 AM             |     | 7 AM             |     | 6 AM                  |     | 7 AM             |     |
| I-81 NB           | I-81 NB Off-Ramp to NYS Route 31 | Diverge      | 3.1              | A   | 5.1              | A   | 3.6                   | A   | 70.8             | F   |
|                   |                                  |              | 4 PM             |     | 5 PM             |     | 4 PM                  |     | 5 PM             |     |
| I-81 NB           | I-81 NB Off-Ramp to NYS Route 31 | Diverge      | 14.6             | B   | 12.9             | B   | 34.6                  | D   | 42.8             | E   |

**Revised Modeling Analysis 2029 - Preferred Action – Mitigation Scenario C**

**Intersection Only – Significantly Affected Only**

| No. | Intersection Name              | 2029 No Action  |     | 2029 Scenario C |     | 2029 No Action  |     | 2029 Scenario C |     |
|-----|--------------------------------|-----------------|-----|-----------------|-----|-----------------|-----|-----------------|-----|
|     |                                | Delay (sec/veh) | LOS |
|     |                                | 6 AM            |     | 6 AM            |     | 7 AM            |     | 7 AM            |     |
| 280 | NYS Route 31 and Oswego Road   | 25.9            | C   | 26.7            | C   | 42.3            | D   | 76.7            | E   |
|     |                                | 4 PM            |     | 4 PM            |     | 5 PM            |     | 5 PM            |     |
| 6   | Morgan Road and NYS Route 31   | 111.2           | F   | 107.3           | F   | 45.2            | D   | 69.8            | E   |
| 54  | Doreen Avenue and NYS Route 31 | 80.3            | F   | 91.3            | F   | 44.6            | E   | 53.8            | F   |
| 55  | NYS Route 31 and Button Road   | 90.6            | F   | 99              | F   | 45              | E   | 55.2            | F   |

**No Significantly Affected Freeway Segments**

## DEIS Modeling Analysis 2031 – Preferred Action – Mitigation Scenario C

### Intersections – Significantly Affected Only

| Intersection ID | Intersection name                        | Intersection Control | 2031 No Action Alternative |     |      | 2031 Preferred Action Alternative |     |      | 2031 Preferred Action w/Mitigation |     |      | 2031 No Action Alternative |     |      | 2031 Preferred Action Alternative |     |      | 2031 Preferred Action Alternative with Recommended Mitigation C |     |      |
|-----------------|------------------------------------------|----------------------|----------------------------|-----|------|-----------------------------------|-----|------|------------------------------------|-----|------|----------------------------|-----|------|-----------------------------------|-----|------|-----------------------------------------------------------------|-----|------|
|                 |                                          |                      | Delay (sec/veh)            | LOS | v/c  | Delay (sec/veh)                   | LOS | v/c  | Delay (sec/veh)                    | LOS | v/c  | Delay (sec/veh)            | LOS | v/c  | Delay (sec/veh)                   | LOS | v/c  | Delay (sec/veh)                                                 | LOS | v/c  |
|                 |                                          |                      | 6 AM                       |     |      | 6 AM                              |     |      | 6 AM                               |     |      | 7 AM                       |     |      | 7 AM                              |     |      | 7 AM                                                            |     |      |
|                 |                                          |                      | 4 PM                       |     |      | 4 PM                              |     |      | 4 PM                               |     |      | 5 PM                       |     |      | 5 PM                              |     |      | 5 PM                                                            |     |      |
| 1               | NYS Route 481 and NYS Route 31           | Signalized           | 32.6                       | C   | 0.67 | 34.4                              | C   | 0.69 | 8.0                                | A   | 0.62 | 44.3                       | D   | 0.97 | 127.3                             | F   | 1.22 | 11.8                                                            | B   | 0.77 |
| 4               | Parking Lot/GNM West and NYS Route 31    | Signalized           | 39.9                       | D   | 0.56 | 53.9                              | D   | 0.53 | 12.9                               | B   | 0.43 | 27.0                       | C   | 0.77 | 120.2                             | F   | 0.84 | 24.1                                                            | C   | 0.62 |
| 5               | Parking Lot/GNM East and NYS Route 31    | Signalized           | 12.9                       | B   | 0.46 | 21.6                              | C   | 0.65 | 17.2                               | B   | 0.36 | 33.5                       | C   | 1.07 | 64.2                              | E   | 1.48 | 25.3                                                            | C   | 0.61 |
| 6               | Morgan Road and NYS Route 31             | Signalized           | 60.7                       | E   | 1.05 | 55.7                              | E   | 1.07 | 24.0                               | C   | 0.49 | 148.3                      | F   | 1.71 | 209.2                             | F   | 1.84 | 32.8                                                            | C   | 0.85 |
| 7               | Henry Clay Boulevard and NYS Route 31    | Signalized           | 12.0                       | B   | 0.51 | 13.5                              | B   | 0.59 | 18.9                               | B   | 0.31 | 20.4                       | C   | 0.80 | 88.0                              | F   | 1.13 | 30.3                                                            | C   | 0.83 |
| 8               | Grange Road W and NYS Route 31           | Signalized           | 8.5                        | A   | 0.44 | 9.5                               | A   | 0.47 | 2.4                                | A   | 0.19 | 10.0                       | A   | 0.62 | 149.8                             | F   | 1.15 | 1.9                                                             | A   | 0.53 |
| 9               | Van Hoesen Road and NYS Route 31         | Unsignalized         | 15.8                       | C   | 0.00 | 16.4                              | C   | 0.00 | 3.7                                | A   | 0.20 | 30.7                       | D   | 0.00 | 286.7                             | F   | 0.00 | 2.1                                                             | A   | 0.49 |
| 10              | Grange Road E and NYS Route 31           | Unsignalized         | 11.3                       | B   | 0.00 | 11.5                              | B   | 0.00 | 10.1                               | B   | 0.00 | 13.8                       | B   | 0.00 | 36.2                              | E   | 0.00 | 13.6                                                            | B   | 0.00 |
| 11              | Caughdenoy Road and NYS Route 31         | Signalized           | 11.4                       | B   | 0.44 | 22.6                              | C   | 0.48 | 4.2                                | A   | 0.22 | 16.0                       | B   | 0.66 | 83.5                              | F   | 1.20 | 6.0                                                             | A   | 0.56 |
| 50              | McNamara Drive/Driveway and NYS Route 31 | Unsignalized         | 21.6                       | C   | 0.00 | 22.4                              | C   | 0.00 | 12.8                               | B   | 0.21 | 151.4                      | F   | 0.00 | >300                              | F   | 0.00 | 14.3                                                            | B   | 0.61 |
| 56              | NYS Route 31 and Weller Canning Road     | Unsignalized         | 12.7                       | B   | 0.00 | 13.0                              | B   | 0.00 | 10.3                               | B   | 0.00 | 18.1                       | C   | 0.00 | 46.4                              | E   | 0.00 | 13.0                                                            | B   | 0.00 |
| 69              | Morgan Road and Verplank Road            | Unsignalized         | 22.1                       | C   | 0.00 | 22.4                              | C   | 0.00 | 8.4                                | A   | 0.41 | 221.8                      | F   | 0.00 | >300                              | F   | 0.00 | 11.3                                                            | B   | 0.62 |
| 280             | Oswego Road/Oswego Road and NYS Route 31 | Signalized           | 27.1                       | C   | 0.71 | 28.9                              | C   | 0.74 | 20.5                               | C   | 0.62 | 79.6                       | E   | 1.04 | 92.2                              | F   | 1.13 | 38.8                                                            | D   | 0.90 |
| 1               | NYS Route 481 and NYS Route 31           | Signalized           | 164.2                      | F   | 1.47 | 163.6                             | F   | 1.43 | 77.2                               | E   | 1.19 | 181.9                      | F   | 1.52 | 213.0                             | F   | 1.54 | 46.9                                                            | D   | 1.07 |
| 2               | NYS Route 481 and NYS Route 31           | Signalized           | 197.9                      | F   | 1.38 | 204.2                             | F   | 1.38 | 52.3                               | D   | 1.06 | 155.3                      | F   | 1.36 | 196.2                             | F   | 1.45 | 32.0                                                            | C   | 0.99 |
| 6               | Morgan Road and NYS Route 31             | Signalized           | 273.4                      | F   | 1.88 | 292.7                             | F   | 2.07 | 55.9                               | E   | 0.92 | 187.2                      | F   | 1.66 | 293.0                             | F   | 2.05 | 45.6                                                            | D   | 0.82 |
| 7               | Henry Clay Boulevard and NYS Route 31    | Signalized           | 215.4                      | F   | 1.51 | 81.2                              | F   | 1.17 | 33.4                               | C   | 0.66 | 90.0                       | F   | 1.09 | 119.1                             | F   | 1.28 | 25.9                                                            | C   | 0.71 |
| 8               | Grange Road W and NYS Route 31           | Signalized           | 152.6                      | F   | 1.24 | 66.4                              | E   | 1.04 | 10.8                               | B   | 0.54 | 25.9                       | C   | 0.83 | 63.6                              | E   | 1.06 | 9.0                                                             | A   | 0.62 |
| 9               | Van Hoesen Road and NYS Route 31         | Unsignalized         | 78.9                       | F   | 0.00 | 62.7                              | F   | 0.00 | 2.5                                | A   | 0.45 | 53.6                       | F   | 0.00 | 73.9                              | F   | 0.00 | 3.4                                                             | A   | 0.59 |

| Intersection ID | Intersection name                                      | Intersection Control   | 2031 No Action Alternative |     |      | 2031 Preferred Action Alternative |     |      | 2031 Preferred Action w/Mitigation |     |      | 2031 No Action Alternative |     |      | 2031 Preferred Action Alternative |     |      | 2031 Preferred Action Alternative with Recommended Mitigation C |     |      |
|-----------------|--------------------------------------------------------|------------------------|----------------------------|-----|------|-----------------------------------|-----|------|------------------------------------|-----|------|----------------------------|-----|------|-----------------------------------|-----|------|-----------------------------------------------------------------|-----|------|
|                 |                                                        |                        | Delay (sec/veh)            | LOS | v/c  | Delay (sec/veh)                   | LOS | v/c  | Delay (sec/veh)                    | LOS | v/c  | Delay (sec/veh)            | LOS | v/c  | Delay (sec/veh)                   | LOS | v/c  | Delay (sec/veh)                                                 | LOS | v/c  |
| 11              | Caughdenoy Road and NYS Route 31                       | Signalized             | 64.3                       | E   | 1.07 | 49.2                              | D   | 1.04 | 17.7                               | B   | 0.57 | 40.6                       | D   | 0.94 | 103.4                             | F   | 1.10 | 8.2                                                             | A   | 0.59 |
| 14              | Barcaldine Drive/Legionnaire Drive and NYS Route 31    | Unsignalized           | 20.8                       | C   | 0.00 | 31.4                              | D   | 0.00 | 12.4                               | B   | 0.00 | 16.8                       | C   | 0.00 | 110.0                             | F   | 0.00 | 13.0                                                            | B   | 0.00 |
| 15              | Lawton Road/Legionnaire Drive and NYS Route 31         | Signalized             | 16.3                       | B   | 0.73 | 25.4                              | C   | 0.82 | 19.1                               | B   | 0.75 | 12.4                       | B   | 0.64 | 98.5                              | F   | 1.10 | 34.5                                                            | C   | 0.53 |
| 16              | U.S. Route 11 and NYS Route 31                         | Signalized             | 57.9                       | E   | 1.05 | 66.2                              | E   | 1.11 | 27.5                               | C   | 0.72 | 44.8                       | D   | 0.94 | 192.7                             | F   | 1.70 | 48.4                                                            | D   | 0.83 |
| 17              | I-81 SB On-Ramp/I-81 SB Off-Ramp and NYS Route 31      | Signalized             | 26.1                       | C   | 0.90 | 26.2                              | C   | 0.87 | 25.4                               | C   | 0.76 | 24.3                       | C   | 0.82 | 75.3                              | E   | 1.18 | 18.4                                                            | B   | 0.89 |
| 19              | NYS Route 31 and Lakeshore Road                        | Unsignalized           | N/A                        | E   | N/A  | N/A                               | F   | N/A  | N/A                                | D   | N/A  | N/A                        | D   | N/A  | N/A                               | D   | N/A  | N/A                                                             | D   | N/A  |
| 20              | Parking Lot/Lakeshore Rd Spur and NYS Route 31         | Signalized             | 60.3                       | E   | 1.16 | 82.7                              | F   | 1.23 | 50.6                               | D   | 0.98 | 39.8                       | D   | 1.01 | 42.3                              | D   | 1.04 | 43.3                                                            | D   | 0.92 |
| 24              | South Bay Road and NYS Route 31                        | Signalized             | 56.9                       | E   | 1.08 | 59.0                              | E   | 1.06 | 31.7                               | C   | 0.68 | 46.9                       | D   | 0.99 | 61.4                              | E   | 1.09 | 34.0                                                            | C   | 0.73 |
| 26              | Caughdenoy Road and Verplank Road                      | Unsignalized           | 19.8                       | C   | 0.00 | 23.0                              | C   | 0.00 | 7.3                                | A   | 0.39 | 14.2                       | B   | 0.00 | 214.4                             | F   | 0.00 | 7.2                                                             | A   | 0.46 |
| 54              | Doreen Avenue and NYS Route 31                         | Unsignalized           | 61.4                       | F   | 0.00 | 68.3                              | F   | 0.00 | 17.7                               | C   | 0.00 | 38.0                       | E   | 0.00 | 49.1                              | E   | 0.00 | 21.6                                                            | C   | 0.00 |
| 55              | NYS Route 31 and Button Road                           | Unsignalized           | 50.6                       | F   | 0.00 | 25.4                              | D   | 0.00 | 5.9                                | A   | 0.53 | 34.4                       | D   | 0.00 | 44.5                              | E   | 0.00 | 10.4                                                            | B   | 0.62 |
| 56              | NYS Route 31 and Weller Canning Road                   | Unsignalized           | 185.2                      | F   | 0.00 | 140.0                             | F   | 0.00 | 12.8                               | B   | 0.00 | 73.8                       | F   | 0.00 | 281.6                             | F   | 0.00 | 14.2                                                            | B   | 0.00 |
| 72              | Morgan Road and GNM Driveway 2                         | Unsignalized           | 170.0                      | F   | 0.00 | 118.5                             | F   | 0.00 | 15.3                               | B   | 0.61 | 42.4                       | E   | 0.00 | 68.6                              | F   | 0.00 | 14.7                                                            | B   | 0.72 |
| 77              | Soule Rd/NYS Route 481                                 | Signalized /Roundabout | 70.7                       | E   | 1.02 | 62.5                              | E   | 1.01 | 53.8                               | D   | 0.00 | 60.4                       | E   | 1.02 | 80.5                              | F   | 1.07 | 32.8                                                            | C   | 0.00 |
| 262             | Carling Road South/Carling Road North and NYS Route 31 | Signalized             | 69.2                       | E   | 1.11 | 57.2                              | E   | 1.07 | 56.4                               | E   | 1.12 | 52.3                       | D   | 1.05 | 62.9                              | E   | 1.10 | 31.5                                                            | C   | 0.95 |
| 280             | Oswego Road and NYS Route 31                           | Signalized             | 89.2                       | F   | 1.15 | 72.0                              | E   | 1.06 | 53.8                               | D   | 1.07 | 87.9                       | F   | 1.12 | 107.5                             | F   | 1.16 | 34.8                                                            | C   | 0.91 |

## Freeway Segments – Significantly Affected Only

| Segment Direction | Segment Description                          | Segment Type | 2031 No Action Alternative |      |      |      | 2031 Preferred Action Alternative |      |      |      | 2031 Preferred Action Alternative with Recommended Mitigation C |      |      |      |
|-------------------|----------------------------------------------|--------------|----------------------------|------|------|------|-----------------------------------|------|------|------|-----------------------------------------------------------------|------|------|------|
|                   |                                              |              | Density (veh/mi/ln)        |      | LOS  |      | Density (veh/mi/ln)               |      | LOS  |      | Density (Veh/mi/ln)                                             |      | LOS  |      |
|                   |                                              |              | 6 AM                       | 7 AM | 4 PM | 5 PM | 4 PM                              | 5 PM | 4 PM | 5 PM | 4 PM                                                            | 5 PM | 4 PM | 5 PM |
| I-81 NB           | I-81 NB Off-Ramp to NYS Route 31             | Diverge      | 3.4                        | A    | 5.0  | A    | 3.8                               | A    | 95.2 | F    | 3.1                                                             | A    | 5.8  | A    |
| NYS Route 481 WB  | NYS Route 481 WB Off-Ramp to Caughdenoy Road | Diverge      | 3.6                        | A    | 5.7  | A    | 3.9                               | A    | 72.7 | F    | 3.5                                                             | A    | 9.1  | A    |
| I-81 NB           | I-81 NB Between I-481 and NYS Route 31       | Basic        | 15.2                       | B    | 12.5 | B    | 19.4                              | C    | 37.0 | E    | 16.9                                                            | B    | 15.4 | B    |
|                   | I-81 NB Off-Ramp to NYS Route 31             | Diverge      | 15.7                       | B    | 12.9 | B    | 38.5                              | E    | 75.4 | F    | 10.0                                                            | A    | 9.2  | A    |

## Revised Modeling Analysis 2031 – Preferred Action – Mitigation Scenario C

### Intersections – Significantly Affected Only

| Intersection ID | Intersection Name                         | Intersection Control | 2031 No Action Alternative |     |      | 2031 Preferred Action Alternative |     |      | 2031 Preferred Action Alternative with Mitigation Scenario C |     |      | 2031 No Action Alternative |     |      | 2031 Preferred Action Alternative |     |      | 2031 Preferred Action Alternative with Mitigation Scenario C |     |      |
|-----------------|-------------------------------------------|----------------------|----------------------------|-----|------|-----------------------------------|-----|------|--------------------------------------------------------------|-----|------|----------------------------|-----|------|-----------------------------------|-----|------|--------------------------------------------------------------|-----|------|
|                 |                                           |                      | 6 AM                       |     |      | 6 AM                              |     |      | 6 AM                                                         |     |      | 7 AM                       |     |      | 7 AM                              |     |      | 7 AM                                                         |     |      |
|                 |                                           |                      | Delay (sec/veh)            | LOS | v/c  | Delay (sec/veh)                   | LOS | v/c  | Delay (sec/veh)                                              | LOS | v/c  | Delay (sec/veh)            | LOS | v/c  | Delay (sec/veh)                   | LOS | v/c  | Delay (sec/veh)                                              | LOS | v/c  |
| 1               | NYS Route 31 and NYS Route 481 SB         | Signalized           | 18.7                       | B   | 0.64 | 18.8                              | B   | 0.65 | 29.9                                                         | C   | 0.41 | 34.6                       | C   | 1.04 | 59.8                              | E   | 1.12 | 16                                                           | B   | 0.63 |
| 6               | Morgan Road and NYS Route 31              | Signalized           | 36.1                       | D   | 0.79 | 37.3                              | D   | 0.8  | 37.6                                                         | D   | 0.39 | 120.7                      | F   | 1.24 | 115.6                             | F   | 1.23 | 37.6                                                         | D   | 0.66 |
| 7               | Henry Clay Boulevard and NYS Route 31     | Signalized           | 14.8                       | B   | 0.56 | 15.3                              | B   | 0.58 | 14.9                                                         | B   | 0.31 | 51                         | D   | 0.98 | 205.6                             | F   | 1.37 | 22.8                                                         | C   | 0.7  |
| 8               | Grange Road W and NYS Route 31            | Unsignalized         | 20.6                       | C   | N/A  | 22.4                              | C   | N/A  | 4.7                                                          | A   | 0.16 | 67.2                       | F   | N/A  | >300                              | F   | N/A  | 5.8                                                          | A   | 0.45 |
| 9               | Van Hoesen Road and NYS Route 31          | Unsignalized         | 19.1                       | C   | N/A  | 20.7                              | C   | N/A  | 4.7                                                          | A   | 0.17 | 46.7                       | E   | N/A  | 278.3                             | F   | N/A  | 5                                                            | A   | 0.39 |
| 12              | Stearns Road and NYS Route 31             | Unsignalized         | 15.4                       | C   | N/A  | 16.4                              | C   | N/A  | 10.1                                                         | B   | 0.2  | 44.8                       | E   | N/A  | 249.1                             | F   | N/A  | 12.4                                                         | B   | 0.5  |
| 17              | NYS Route 31 and I-81 SB Ramp             | Signalized           | 30.2                       | C   | 0.74 | 29.2                              | C   | 0.75 | 44.6                                                         | D   | 0.32 | 92.1                       | F   | 1.2  | 89.6                              | F   | 1.21 | 39.3                                                         | D   | 0.59 |
| 18              | NYS Route 31 and Pardee Road/I-81 NB Ramp | Signalized           | 24.9                       | C   | 0.55 | 26.5                              | C   | 0.59 | 13.6                                                         | B   | 0.36 | 55.2                       | E   | 0.86 | 64.9                              | E   | 1.06 | 12.3                                                         | B   | 0.59 |
| 34              | U.S. Route 11 and Bear Road               | Signalized           | 56.8                       | E   | 0.49 | 56.4                              | E   | 0.49 | 39.8                                                         | D   | 0.41 | 59.3                       | E   | 0.71 | 59.8                              | E   | 0.72 | 39.3                                                         | D   | 0.58 |
| 50              | McNamara Drive/Driveway and NYS Route 31  | Unsignalized         | 30.4                       | D   | N/A  | 34.9                              | D   | N/A  | 12.2                                                         | B   | 0.22 | >300                       | F   | N/A  | >300                              | F   | N/A  | 14.4                                                         | B   | 0.53 |
| 56              | NYS Route 31 and Weller Canning Road      | Unsignalized         | 14.8                       | B   | N/A  | 15.5                              | C   | N/A  | 10.6                                                         | B   | N/A  | 24.1                       | C   | N/A  | 54.8                              | F   | N/A  | 12.5                                                         | B   | N/A  |
| 69              | Morgan Road and Verplank Road             | Signalized           | 19.3                       | C   | N/A  | 19.6                              | C   | N/A  | 14.7                                                         | B   | 0.36 | 152                        | F   | N/A  | 142.4                             | F   | N/A  | 16.9                                                         | B   | 0.58 |
| 70              | Morgan Road and GNM Driveway 1            | Signalized           | 14.8                       | B   | N/A  | 14.9                              | B   | N/A  | 6.8                                                          | A   | 0.35 | 197.8                      | F   | N/A  | 218.3                             | F   | N/A  | 8.6                                                          | A   | 0.52 |
| 280             | NYS Route 31 and Oswego Road              | Signalized           | 29.9                       | C   | 0.69 | 31                                | C   | 0.72 | 25.1                                                         | C   | 0.47 | 140.4                      | F   | 1.1  | 185.2                             | F   | 1.22 | 43                                                           | D   | 0.82 |

| Intersection ID | Intersection Name                                                | Intersection Control | 2031 No Action Alternative |     |      | 2031 Preferred Action Alternative |     |      | 2031 Preferred Action Alternative with Mitigation Scenario C |     |      | 2031 No Action Alternative |     |      | 2031 Preferred Action Alternative |     |      | 2031 Preferred Action Alternative with Mitigation Scenario C |     |      |
|-----------------|------------------------------------------------------------------|----------------------|----------------------------|-----|------|-----------------------------------|-----|------|--------------------------------------------------------------|-----|------|----------------------------|-----|------|-----------------------------------|-----|------|--------------------------------------------------------------|-----|------|
|                 |                                                                  |                      | 4 PM                       |     |      | 4 PM                              |     |      | 4 PM                                                         |     |      | 5 PM                       |     |      | 5 PM                              |     |      | 5 PM                                                         |     |      |
|                 |                                                                  |                      | Delay (sec/veh)            | LOS | v/c  | Delay (sec/veh)                   | LOS | v/c  | Delay (sec/veh)                                              | LOS | v/c  | Delay (sec/veh)            | LOS | v/c  | Delay (sec/veh)                   | LOS | v/c  | Delay (sec/veh)                                              | LOS | v/c  |
| 1               | NYS Route 31 and NYS Route 481 SB                                | Signalized           | 219                        | F   | 1.66 | 224.2                             | F   | 1.67 | 51.8                                                         | D   | 1.08 | 162.7                      | F   | 1.5  | 188.2                             | F   | 1.56 | 43.1                                                         | D   | 1.05 |
| 2               | NYS Route 31 and NYS Route 481 NB                                | Signalized           | 299.3                      | F   | 1.68 | >300                              | F   | 1.7  | 47.4                                                         | D   | 1.01 | 231.2                      | F   | 1.49 | 291.8                             | F   | 1.61 | 36.9                                                         | D   | 0.94 |
| 3               | Marketfair Plaza and NYS Route 31                                | Signalized           | 92.9                       | F   | 1.22 | 97.7                              | F   | 1.23 | 4                                                            | A   | 0.77 | 21.5                       | C   | 1.03 | 47.1                              | D   | 1.13 | 1.8                                                          | A   | 0.68 |
| 4               | NYS Route 31 and GNM West                                        | Signalized           | 215.7                      | F   | 1.54 | 225.1                             | F   | 1.56 | 74.2                                                         | E   | 1.09 | 132.1                      | F   | 1.27 | 174.6                             | F   | 1.4  | 53.6                                                         | D   | 0.97 |
| 5               | Parking Lot/GNM East and NYS Route 31                            | Signalized           | 215.4                      | F   | 2.45 | 217.5                             | F   | 2.39 | 53.8                                                         | D   | 0.97 | 96.7                       | F   | 1.87 | 108.5                             | F   | 1.84 | 46.8                                                         | D   | 0.87 |
| 6               | Morgan Road and NYS Route 31                                     | Signalized           | 227.3                      | F   | 1.88 | 230.9                             | F   | 1.91 | 50.3                                                         | D   | 0.93 | 148.2                      | F   | 1.62 | 182.8                             | F   | 1.64 | 46.1                                                         | D   | 0.84 |
| 7               | Henry Clay Boulevard and NYS Route 31                            | Signalized           | 140.8                      | F   | 1.23 | 150.1                             | F   | 1.25 | 23.4                                                         | C   | 0.7  | 68.2                       | E   | 1    | 95                                | F   | 1.11 | 23.6                                                         | C   | 0.72 |
| 8               | Grange Road W and NYS Route 31                                   | Unsignalized         | >300                       | F   | N/A  | >300                              | F   | N/A  | 11.4                                                         | B   | 0.59 | >300                       | F   | N/A  | >300                              | F   | N/A  | 9.2                                                          | A   | 0.63 |
| 9               | Van Hoesen Road and NYS Route 31                                 | Unsignalized         | 119.9                      | F   | N/A  | 141.2                             | F   | N/A  | 4.4                                                          | A   | 0.42 | 59.4                       | F   | N/A  | 132.2                             | F   | N/A  | 3.7                                                          | A   | 0.47 |
| 10              | Grange Road E and NYS Route 31                                   | Unsignalized         | 35.7                       | E   | N/A  | 38                                | E   | N/A  | 13.4                                                         | B   | N/A  | 22.5                       | C   | N/A  | 24.8                              | C   | N/A  | 12.9                                                         | B   | N/A  |
| 11              | Caughdenoy Road and NYS Route 31                                 | Signalized           | 68.6                       | E   | 1.12 | 74.8                              | E   | 1.16 | 15.7                                                         | B   | 0.57 | 30                         | C   | 0.91 | 85.4                              | F   | 1.27 | 19.2                                                         | B   | 0.49 |
| 12              | Stearns Road and NYS Route 31                                    | Unsignalized         | >300                       | F   | N/A  | >300                              | F   | N/A  | 12.5                                                         | B   | 0.61 | >300                       | F   | N/A  | >300                              | F   | N/A  | 12.5                                                         | B   | 0.68 |
| 16              | U.S. Route 11 and NYS Route 31                                   | Signalized           | 64.6                       | E   | 1.02 | 90.5                              | F   | 1.12 | 44.3                                                         | D   | 0.77 | 59.8                       | E   | 1.04 | 117.2                             | F   | 1.39 | 45.9                                                         | D   | 0.79 |
| 17              | NYS Route 31 and I-81 SB Ramp                                    | Signalized           | 102.2                      | F   | 1.18 | 141.1                             | F   | 1.27 | 25                                                           | C   | 0.64 | 77.9                       | E   | 1.08 | 172.2                             | F   | 1.28 | 22.7                                                         | C   | 0.59 |
| 18              | NYS Route 31 and Pardee Road/I-81 NB Ramp                        | Signalized           | 121.7                      | F   | 1.31 | 154.2                             | F   | 1.34 | 34.7                                                         | C   | 0.58 | 84.8                       | F   | 1.24 | 83.6                              | F   | 1.12 | 29.8                                                         | C   | 0.54 |
| 24              | South Bay Road and NYS Route 31                                  | Signalized           | 67                         | E   | 1.21 | 85.2                              | F   | 1.32 | 34.1                                                         | C   | 0.79 | 38                         | D   | 0.86 | 53.7                              | D   | 1.05 | 31.3                                                         | C   | 0.75 |
| 26              | Caughdenoy Road and Verplank Road                                | Unsignalized         | 20.4                       | C   | N/A  | 29.3                              | D   | N/A  | 8.6                                                          | A   | 0.33 | 18                         | C   | N/A  | 51.7                              | F   | N/A  | 8.2                                                          | A   | 0.35 |
| 31              | Raymour and Flanigan/Wegmans East and NYS Route 31               | Signalized           | 185.2                      | F   | 1.29 | 196.4                             | F   | 1.32 | 44.1                                                         | D   | 0.88 | 85.3                       | F   | 1.02 | 101.8                             | F   | 1.07 | 36                                                           | D   | 0.76 |
| 34              | U.S. Route 11 and Bear Road                                      | Signalized           | 88.6                       | F   | 1.15 | 92.9                              | F   | 1.18 | 42.5                                                         | D   | 0.82 | 60.8                       | E   | 0.97 | 63.4                              | E   | 1.01 | 41.9                                                         | D   | 0.8  |
| 37              | NYS Route 481 WB On/Off-Ramp and Circle Drive E                  | Signalized           | 76.8                       | E   | 0.9  | 78.2                              | E   | 0.92 | 16.1                                                         | B   | 0.53 | 58.4                       | E   | 0.75 | 63.7                              | E   | 0.79 | 16.3                                                         | B   | 0.5  |
| 38              | U.S. Route 11 and Circle Drive W/Circle Drive E                  | Signalized           | 72.4                       | E   | 1.04 | 85.4                              | F   | 1.05 | 18.2                                                         | B   | 0.82 | 28.6                       | C   | 0.85 | 32.3                              | C   | 0.87 | 15.2                                                         | B   | 0.71 |
| 43              | U.S. Route 11 and Crabtree Lane                                  | Unsignalized         | >300                       | F   | N/A  | >300                              | F   | N/A  | 11.9                                                         | B   | 0.53 | >300                       | F   | N/A  | >300                              | F   | N/A  | 10.6                                                         | B   | 0.45 |
| 47              | Cicero-North Syracuse High School East Driveway and NYS Route 31 | Unsignalized         | 46                         | E   | N/A  | 162.6                             | F   | N/A  | 30.9                                                         | D   | N/A  | 25.3                       | D   | N/A  | 74.5                              | F   | N/A  | 25.6                                                         | D   | N/A  |
| 50              | McNamara Drive/Driveway and NYS Route 31                         | Unsignalized         | >300                       | F   | N/A  | >300                              | F   | N/A  | 12.1                                                         | B   | 0.63 | >300                       | F   | N/A  | >300                              | F   | N/A  | 11                                                           | B   | 0.66 |
| 54              | Doreen Avenue and NYS Route 31                                   | Unsignalized         | 106.9                      | F   | N/A  | 109.7                             | F   | N/A  | 40.8                                                         | E   | N/A  | 53.4                       | F   | N/A  | 63.4                              | F   | N/A  | 32.1                                                         | D   | N/A  |
| 55              | NYS Route 31 and Button Road                                     | Unsignalized         | 120.1                      | F   | N/A  | 130.1                             | F   | N/A  | 37.4                                                         | E   | N/A  | 54                         | F   | N/A  | 67.7                              | F   | N/A  | 45.6                                                         | E   | N/A  |
| 56              | NYS Route 31 and Weller Canning Road                             | Unsignalized         | 247.2                      | F   | N/A  | >300                              | F   | N/A  | 14.9                                                         | B   | N/A  | 123.3                      | F   | N/A  | >300                              | F   | N/A  | 16.6                                                         | C   | N/A  |
| 66              | White Pines South Driveway and NYS Route 31                      | Unsignalized         | -                          | -   | -    | 181.2                             | F   | N/A  | 14.3                                                         | B   | N/A  | -                          | -   | -    | 55.3                              | F   | N/A  | 14                                                           | B   | N/A  |
| 69              | Morgan Road and Verplank Road                                    | Signalized           | >300                       | F   | N/A  | >300                              | F   | N/A  | 26.2                                                         | C   | 0.76 | >300                       | F   | N/A  | >300                              | F   | N/A  | 26                                                           | C   | 0.72 |
| 70              | Morgan Road and GNM Driveway 1                                   | Signalized           | >300                       | F   | N/A  | >300                              | F   | N/A  | 15.6                                                         | B   | 0.68 | >300                       | F   | N/A  | >300                              | F   | N/A  | 14.7                                                         | B   | 0.61 |
| 258             | Texas Roadhouse/Delta Sonic and NYS Route 31                     | Signalized           | 71.5                       | E   | 1.12 | 79.7                              | E   | 1.15 | 23.2                                                         | C   | 0.82 | 29.9                       | C   | 0.94 | 40.4                              | D   | 1    | 19.6                                                         | B   | 0.72 |
| 262             | NYS Route 31 and Carling Road                                    | Signalized           | 137.2                      | F   | 1.23 | 147                               | F   | 1.27 | 25.4                                                         | C   | 0.88 | 83                         | F   | 1.06 | 102.1                             | F   | 1.11 | 21.4                                                         | C   | 0.79 |
| 267             | NYS Route 31 and Dell Center Drive                               | Signalized           | 120.6                      | F   | 1.25 | 127.3                             | F   | 1.28 | 33.7                                                         | C   | 0.92 | 54.4                       | D   | 1.06 | 70.4                              | E   | 1.11 | 28.4                                                         | C   | 0.8  |
| 276             | Lowes/Home Depot and NYS Route 31                                | Signalized           | 105.1                      | F   | 1.11 | 116.7                             | F   | 1.14 | 40.5                                                         | D   | 0.92 | 48.7                       | D   | 0.92 | 62.3                              | E   | 0.98 | 33.4                                                         | C   | 0.84 |
| 280             | NYS Route 31 and Oswego Road                                     | Signalized           | 284.9                      | F   | 1.46 | >300                              | F   | 1.5  | 42.8                                                         | D   | 0.97 | 200.4                      | F   | 1.27 | 225.1                             | F   | 1.31 | 40.6                                                         | D   | 0.93 |
| 288             | Soule Road and Carling Road and NYS Route 481 SB Ramp            | Roundabout           | 177.7                      | F   | 1.23 | 184.1                             | F   | 1.25 | 39.5                                                         | D   | N/A  | 115.2                      | F   | 1.09 | 145.4                             | F   | 1.13 | 26.8                                                         | C   | N/A  |

### Freeway Segments – Significantly Affected Only

| Segment Direction | Segment Description                                       | Segment Type | 2031 No Action Alternative |     |         |     | 2031 Preferred Action Alternative |     |         |     | 2031 Preferred Action Alternative with Mitigation Scenario C |     |         |     |
|-------------------|-----------------------------------------------------------|--------------|----------------------------|-----|---------|-----|-----------------------------------|-----|---------|-----|--------------------------------------------------------------|-----|---------|-----|
|                   |                                                           |              | 4 PM                       |     | 5 PM    |     | 4 PM                              |     | 5 PM    |     | 4 PM                                                         |     | 5 PM    |     |
|                   |                                                           |              | Density                    | LOS | Density | LOS | Density                           | LOS | Density | LOS | Density                                                      | LOS | Density | LOS |
| NYS Route 481 WB  | NYS Route 481 WB Between New Access Road and NYS Route 31 | Basic        | 70                         | F   | 165     | F   | 59                                | F   | 168     | F   | 17                                                           | B   | 16      | B   |
|                   | NYS Route 481 WB Off-Ramp to NYS Route 31                 | Diverge      | 161                        | F   | 160     | F   | 156                               | F   | 168     | F   | 9                                                            | A   | 8       | A   |

DEIS Modeling Analysis 2041 – Preferred Action – Mitigation Scenario C

Intersections – Significantly Affected Only

| Intersection ID | Intersection Name                                   | Intersection Control        | 2041 No Action Alternative |     |      | 2041 Preferred Action Alternative |     |      | 2041 Preferred Action w/Mitigation |     |      | 2041 No Action Alternative |     |      | 2041 Preferred Action Alternative |     |      | 2041 Preferred Action Alternative with Mitigation Scenario C |     |      |
|-----------------|-----------------------------------------------------|-----------------------------|----------------------------|-----|------|-----------------------------------|-----|------|------------------------------------|-----|------|----------------------------|-----|------|-----------------------------------|-----|------|--------------------------------------------------------------|-----|------|
|                 |                                                     |                             | 6 AM                       |     |      | 6 AM                              |     |      | 6 AM                               |     |      | 7 AM                       |     |      | 7 AM                              |     |      | 7 AM                                                         |     |      |
|                 |                                                     |                             | Delay (sec/veh)            | LOS | v/c  | Delay (sec/veh)                   | LOS | v/c  | Delay (sec/veh)                    | LOS | v/c  | Delay (sec/veh)            | LOS | v/c  | Delay (sec/veh)                   | LOS | v/c  | Delay (sec/veh)                                              | LOS | v/c  |
| 8               | Grange Road W and NYS Route 31                      | Unsignalized                | 23                         | C   | N/A  | 25                                | D   | N/A  | 2                                  | A   | 0.22 | 100                        | F   | N/A  | >300                              | F   | N/A  | 6                                                            | A   | 0.73 |
| 9               | Van Hoesen Road and NYS Route 31                    | Unsignalized                | 20                         | C   | N/A  | 21                                | C   | N/A  | 3                                  | A   | 0.16 | 42                         | E   | N/A  | >300                              | F   | N/A  | 4                                                            | A   | 0.61 |
| 10              | Grange Road E and NYS Route 31                      | Unsignalized                | 12                         | B   | N/A  | 13                                | B   | N/A  | 10                                 | B   | N/A  | 16                         | C   | N/A  | >300                              | F   | N/A  | 15                                                           | C   | N/A  |
| 12              | Stearns Road and NYS Route 31                       | Unsignalized                | 18                         | C   | N/A  | 21                                | C   | N/A  | 6                                  | A   | 0.23 | 66                         | F   | N/A  | >300                              | F   | N/A  | 14                                                           | B   | 0.64 |
| 13              | NYS Route 31 and Burnet Road                        | Unsignalized <sup>(a)</sup> | 15                         | B   | N/A  | 19                                | B   | 0.33 | 3                                  | A   | 0.21 | 23                         | C   | N/A  | >300                              | F   | 6.59 | 19                                                           | B   | 0.77 |
| 14              | Barcaldine Drive/Legionnaire Drive and NYS Route 31 | Unsignalized                | 12                         | B   | N/A  | 11                                | B   | N/A  | 10                                 | B   | N/A  | 18                         | C   | N/A  | 236                               | F   | N/A  | 34                                                           | D   | N/A  |
| 15              | Lawton Road/Legionnaire Drive and NYS Route 31      | Signalized                  | 8                          | A   | 0.49 | 8                                 | A   | 0.51 | 10                                 | A   | 0.33 | 13                         | B   | 0.75 | 246                               | F   | 1.59 | 35                                                           | C   | 0.98 |
| 16              | U.S. Route 11 and NYS Route 31                      | Signalized                  | 27                         | C   | 0.74 | 43                                | D   | 0.65 | 19                                 | B   | 0.33 | 40                         | D   | 1.07 | 94                                | F   | 1.28 | 27                                                           | C   | 0.8  |

| Intersection ID | Intersection Name                                                | Intersection Control        | 2041 No Action Alternative |     |      | 2041 Preferred Action Alternative |     |      | 2041 Preferred Action w/Mitigation |     |      | 2041 No Action Alternative |     |      | 2041 Preferred Action Alternative |     |      | 2041 Preferred Action Alternative with Mitigation Scenario C |     |      |
|-----------------|------------------------------------------------------------------|-----------------------------|----------------------------|-----|------|-----------------------------------|-----|------|------------------------------------|-----|------|----------------------------|-----|------|-----------------------------------|-----|------|--------------------------------------------------------------|-----|------|
|                 |                                                                  |                             | 6 AM                       |     |      | 6 AM                              |     |      | 6 AM                               |     |      | 7 AM                       |     |      | 7 AM                              |     |      | 7 AM                                                         |     |      |
|                 |                                                                  |                             | Delay (sec/veh)            | LOS | v/c  | Delay (sec/veh)                   | LOS | v/c  | Delay (sec/veh)                    | LOS | v/c  | Delay (sec/veh)            | LOS | v/c  | Delay (sec/veh)                   | LOS | v/c  | Delay (sec/veh)                                              | LOS | v/c  |
| 17              | NYS Route 31 and I-81 SB Ramp                                    | Signalized                  | 18                         | B   | 0.79 | 20                                | C   | 0.77 | 15                                 | B   | 0.5  | 51                         | D   | 1.15 | 114                               | F   | 1.33 | 66                                                           | E   | 1.12 |
| 18              | NYS Route 31 and Pardee Road/I-81 NB Ramp                        | Signalized                  | 24                         | C   | 0.6  | 27                                | C   | 0.66 | 13                                 | B   | 0.52 | 40                         | D   | 0.92 | >300                              | F   | 2.24 | 24                                                           | C   | 0.82 |
| 26              | Caughdenoy Road and Verplank Road                                | Unsignalized                | 10                         | A   | N/A  | 10                                | A   | N/A  | 7                                  | A   | 0.16 | 11                         | B   | N/A  | 41                                | E   | N/A  | 11                                                           | B   | 0.48 |
| 40              | NYS Route 481 NB Off-Ramp and Maple Road and Caughdenoy Road     | Unsignalized                | 10                         | A   | N/A  | 10                                | B   | N/A  | 4                                  | A   | N/A  | 11                         | B   | N/A  | >300                              | F   | N/A  | 7                                                            | A   | N/A  |
| 56              | NYS Route 31 and Weller Canning Road                             | Unsignalized                | 15                         | C   | N/A  | 16                                | C   | N/A  | 10                                 | B   | N/A  | 29                         | D   | N/A  | >300                              | F   | N/A  | 15                                                           | C   | N/A  |
|                 |                                                                  |                             | 4 PM                       |     |      | 4 PM                              |     |      | 4 PM                               |     |      | 5 PM                       |     |      | 5 PM                              |     |      | 5 PM                                                         |     |      |
| 1               | NYS Route 31 and NYS Route 481 SB                                | Signalized                  | 68                         | E   | 1.15 | 70                                | E   | 1.14 | 70                                 | E   | 1.17 | 42                         | D   | 1.03 | 64                                | E   | 1.13 | 76                                                           | E   | 1.15 |
| 2               | NYS Route 31 and NYS Route 481 NB                                | Signalized                  | 51                         | D   | 1.08 | 54                                | D   | 1.08 | 45                                 | D   | 1.06 | 27                         | C   | 0.98 | 57                                | E   | 1.07 | 42                                                           | D   | 1.02 |
| 4               | NYS Route 31 and GNM West                                        | Signalized                  | 142                        | F   | 1.4  | 147                               | F   | 1.46 | 56                                 | E   | 1.08 | 83                         | F   | 1.2  | 165                               | F   | 1.52 | 56                                                           | E   | 1.07 |
| 5               | Parking Lot/GNM East and NYS Route 31                            | Signalized                  | 51                         | D   | 1.04 | 83                                | F   | 1.25 | 36                                 | D   | 0.95 | 30                         | C   | 1.01 | 109                               | F   | 1.35 | 38                                                           | D   | 0.96 |
| 6               | Morgan Road and NYS Route 31                                     | Signalized                  | 71                         | E   | 1.09 | 82                                | F   | 1.16 | 56                                 | E   | 0.93 | 59                         | E   | 1.01 | 153                               | F   | 1.56 | 50                                                           | D   | 0.91 |
| 7               | Henry Clay Boulevard and NYS Route 31                            | Signalized                  | 27                         | C   | 0.85 | 64                                | E   | 1.00 | 30                                 | C   | 0.66 | 27                         | C   | 0.86 | 122                               | F   | 1.09 | 28                                                           | C   | 0.83 |
| 9               | Van Hoesen Road and NYS Route 31                                 | Unsignalized                | 108                        | F   | N/A  | 127                               | F   | N/A  | 3                                  | A   | 0.48 | 83                         | F   | N/A  | >300                              | F   | N/A  | 5                                                            | A   | 0.63 |
| 10              | Grange Road E and NYS Route 31                                   | Unsignalized                | 61                         | F   | N/A  | 71                                | F   | N/A  | 13                                 | B   | N/A  | 30                         | D   | N/A  | 41                                | E   | N/A  | 14                                                           | B   | N/A  |
| 11              | Caughdenoy Road and NYS Route 31                                 | Signalized                  | 22                         | C   | 0.9  | 28                                | C   | 0.94 | 32                                 | C   | 0.75 | 12                         | B   | 0.69 | 177                               | F   | 1.17 | 18                                                           | B   | 0.87 |
| 12              | Stearns Road and NYS Route 31                                    | Unsignalized                | 63                         | F   | N/A  | 116                               | F   | N/A  | 10                                 | A   | 0.65 | 70                         | F   | N/A  | >300                              | F   | N/A  | 10                                                           | B   | 0.67 |
| 13              | NYS Route 31 and Burnet Road                                     | Unsignalized <sup>(1)</sup> | 39                         | E   | N/A  | 145                               | F   | 0.75 | 2                                  | A   | 0.47 | 29                         | D   | N/A  | 291                               | F   | 1.61 | 17                                                           | B   | 0.86 |
| 14              | Barcaldine Drive/Legionnaire Drive and NYS Route 31              | Unsignalized                | 16                         | C   | N/A  | 20                                | C   | N/A  | 12                                 | B   | N/A  | 15                         | B   | N/A  | >300                              | F   | N/A  | 11                                                           | B   | N/A  |
| 15              | Lawton Road/Legionnaire Drive and NYS Route 31                   | Signalized                  | 34                         | C   | 0.86 | 46                                | D   | 1.01 | 21                                 | C   | 0.79 | 28                         | C   | 1.01 | 227                               | F   | 1.61 | 33                                                           | C   | 0.97 |
| 16              | U.S. Route 11 and NYS Route 31                                   | Signalized                  | 90                         | F   | 1.2  | 155                               | F   | 1.32 | 31                                 | C   | 0.76 | 60                         | E   | 1.09 | >300                              | F   | 2.01 | 78                                                           | E   | 1.13 |
| 17              | NYS Route 31 and I-81 SB Ramp                                    | Signalized                  | 37                         | D   | 0.98 | 71                                | E   | 1.15 | 25                                 | C   | 0.78 | 24                         | C   | 0.91 | 166                               | F   | 1.71 | 19                                                           | B   | 0.95 |
| 18              | NYS Route 31 and Pardee Road/I-81 NB Ramp                        | Signalized                  | 101                        | F   | 1.67 | 118                               | F   | 1.75 | 25                                 | C   | 0.86 | 89                         | F   | 1.62 | 82                                | F   | 1.56 | 22                                                           | C   | 0.93 |
| 20              | Parking Lot/Lakeshore Spur and NYS Route 31                      | Signalized                  | 48                         | D   | 1.18 | 64                                | E   | 1.28 | 60                                 | E   | 1.02 | 32                         | C   | 1.07 | 93                                | F   | 1.49 | 54                                                           | D   | 1    |
| 24              | South Bay Road and NYS Route 31                                  | Signalized                  | 32                         | C   | 0.93 | 38                                | D   | 1.05 | 46                                 | D   | 0.87 | 24                         | C   | 0.84 | 61                                | E   | 1.35 | 56                                                           | E   | 0.97 |
| 26              | Caughdenoy Road and Verplank Road                                | Unsignalized                | 17                         | C   | N/A  | 19                                | C   | N/A  | 8                                  | A   | 0.34 | 14                         | B   | N/A  | 213                               | F   | N/A  | 8                                                            | A   | 0.48 |
| 28              | Caughdenoy Road and Oak Orchard Road                             | Unsignalized                | 14                         | B   | N/A  | 15                                | C   | N/A  | 14                                 | B   | N/A  | 13                         | B   | N/A  | 36                                | E   | N/A  | 17                                                           | C   | N/A  |
| 34              | U.S. Route 11 and Bear Road                                      | Signalized                  | 50                         | D   | 0.94 | 49                                | D   | 0.98 | 40                                 | D   | 0.83 | 46                         | D   | 0.96 | 62                                | E   | 1.08 | 42                                                           | D   | 0.81 |
| 47              | Cicero-North Syracuse High School East Driveway and NYS Route 31 | Unsignalized                | 138                        | F   | N/A  | 78                                | F   | N/A  | 3                                  | C   | N/A  | 35                         | E   | N/A  | 42                                | E   | N/A  | 40                                                           | E   | N/A  |
| 55              | NYS Route 31 and Button Road                                     | Unsignalized                | 51                         | F   | N/A  | 85                                | F   | N/A  | 8                                  | A   | 0.65 | 29                         | D   | N/A  | >300                              | F   | N/A  | 14                                                           | B   | 0.76 |
| 56              | NYS Route 31 and Weller Canning Road                             | Unsignalized                | 229                        | F   | N/A  | >300                              | F   | N/A  | 13                                 | B   | N/A  | 130                        | F   | N/A  | >300                              | F   | N/A  | 21                                                           | C   | N/A  |
| 69              | Morgan Road and Verplank Road                                    | Signalized                  | 24                         | C   | 0.84 | 26                                | C   | 0.86 | 22                                 | C   | 0.77 | 19                         | B   | 0.82 | 57                                | E   | 1.01 | 21                                                           | C   | 0.72 |
| 72              | Morgan Road and GNM Driveway 2                                   | Unsignalized                | 33                         | D   | N/A  | 34                                | D   | N/A  | 15                                 | B   | 0.62 | 23                         | C   | N/A  | 36                                | E   | N/A  | 15                                                           | B   | 0.7  |
| 260             | U.S. Route 11 and Chick-fil-A                                    | Signalized                  | 54                         | D   | 1.11 | 72                                | E   | 1.17 | 35                                 | C   | 1.03 | 9                          | A   | 0.8  | 18                                | B   | 0.83 | 16                                                           | B   | 0.89 |
| 262             | NYS Route 31 and Carling Road                                    | Signalized                  | 58                         | E   | 1.08 | 83                                | F   | 1.12 | 46                                 | D   | 1.07 | 52                         | D   | 1.03 | 82                                | F   | 1.11 | 33                                                           | C   | 0.97 |

<sup>(1)</sup> Signalized in Preferred Action Scenario

## Freeway Segments – Significantly Affected Only

| Segment Direction | Segment Description                                | Segment Type | 2041 No Action Alternative |     |      |     | 2041 Preferred Action Alternative |     |       |     | 2041 Preferred Action Alternative with Mitigation Scenario C |     |      |     |
|-------------------|----------------------------------------------------|--------------|----------------------------|-----|------|-----|-----------------------------------|-----|-------|-----|--------------------------------------------------------------|-----|------|-----|
|                   |                                                    |              | Density                    |     | LOS  |     | Density                           |     | LOS   |     | Density                                                      |     | LOS  |     |
|                   |                                                    |              | 6AM                        | 7AM | 6AM  | 7AM | 6AM                               | 7AM | 6AM   | 7AM | 6AM                                                          | 7AM | 6AM  | 7AM |
| I-81 NB           | I-81 NB Off-Ramp to I-481                          | Diverge      | 4.8                        | A   | 7.6  | A   | 4.7                               | A   | 36.0  | E   | 5.3                                                          | A   | 12.1 | B   |
|                   | I-81 NB Between Off/On-Ramps to/from NYS Route 481 | Basic        | 5.2                        | A   | 8.8  | A   | 5.2                               | A   | 56.3  | F   | 5.9                                                          | A   | 14.9 | A   |
|                   | I-81 NB Between Off/On-Ramps to/from NYS Route 481 | Weave        | 4.2                        | A   | 7.1  | A   | 4.6                               | A   | 57.4  | F   | 5.3                                                          | A   | 12.6 | A   |
|                   | I-81 NB after Off-Ramp to NYS Route 481            | Basic        | 5.1                        | A   | 8.7  | A   | 4.7                               | A   | 106.7 | F   | 7.4                                                          | A   | 17.6 | A   |
|                   | I-81 NB On-Ramp from NYS Route 481                 | Merge        | 3.2                        | A   | 5.5  | A   | 2.9                               | A   | 118.2 | F   | 4.4                                                          | A   | 10.8 | A   |
|                   | I-81 NB Between NYS Route 481 and NYS Route 31     | Basic        | 4.3                        | A   | 7.3  | A   | 3.9                               | A   | 152.7 | F   | 5.8                                                          | A   | 14.5 | A   |
|                   | I-81 NB Off-Ramp to NYS Route 31                   | Diverge      | 3.4                        | A   | 6.1  | A   | 3.2                               | A   | 164.1 | F   | 3.5                                                          | A   | 8.5  | A   |
| I-81 SB           | I-81 SB Off-Ramp to NYS Route 31                   | Diverge      | 6.5                        | A   | 11.6 | B   | 5.7                               | A   | 46.7  | F   | 8.1                                                          | A   | 15.5 | A   |
| NYS Route 481 WB  | NYS Route 481 WB Off-Ramp to Caughdenoy Road       | Diverge      | 3.8                        | A   | 6.8  | A   | 5.1                               | A   | 49.9  | F   | 3.8                                                          | A   | 12.2 | A   |
|                   | NYS Route 481 WB Off-Ramp to NYS Route 31          | Diverge      | 2.5                        | A   | 4.2  | A   | 3.2                               | A   | 43.9  | E   | 3.0                                                          | A   | 5.1  | A   |

## Revised Modeling Analysis 2041 – Preferred Action – Mitigation Scenario C

## Intersections – Significantly Affected Only

| Intersection ID | Intersection Name                 | Intersection Control | 2041 No Action Alternative |     |      | 2041 Preferred Action Alternative |     |      | 2041 Preferred Action with Mitigation |     |      | 2041 No Action Alternative |     |      | 2041 Preferred Action Alternative |     |      | 2041 Preferred Action Alternative with Mitigation Scenario C |     |      |
|-----------------|-----------------------------------|----------------------|----------------------------|-----|------|-----------------------------------|-----|------|---------------------------------------|-----|------|----------------------------|-----|------|-----------------------------------|-----|------|--------------------------------------------------------------|-----|------|
|                 |                                   |                      | 4 PM                       |     |      | 4 PM                              |     |      | 4 PM                                  |     |      | 5 PM                       |     |      | 5 PM                              |     |      | 5 PM                                                         |     |      |
|                 |                                   |                      | Delay (sec/veh)            | LOS | v/c  | Delay (sec/veh)                   | LOS | v/c  | Delay (sec/veh)                       | LOS | v/c  | Delay (sec/veh)            | LOS | v/c  | Delay (sec/veh)                   | LOS | v/c  | Delay (sec/veh)                                              | LOS | v/c  |
| 1               | NYS Route 31 and NYS Route 481 SB | Signalized           | 228.2                      | F   | 1.68 | 241.4                             | F   | 1.72 | 57.9                                  | E   | 1.1  | 168                        | F   | 1.52 | 202.4                             | F   | 1.58 | 68                                                           | E   | 1.14 |
| 4               | NYS Route 31 and GNM West         | Signalized           | 223.5                      | F   | 1.57 | 267.4                             | F   | 1.62 | 73.5                                  | E   | 1.09 | 133.9                      | F   | 1.29 | 251.6                             | F   | 1.51 | 63.2                                                         | E   | 1.04 |
| 16              | U.S. Route 11 and NYS Route 31    | Signalized           | 72.3                       | E   | 1.05 | 152.1                             | F   | 1.47 | 54.9                                  | D   | 0.88 | 66.5                       | E   | 1.06 | >300                              | F   | 3.67 | 76.1                                                         | E   | 1.05 |
| 24              | South Bay Road and NYS Route 31   | Signalized           | 166                        | F   | 1.47 | 198.4                             | F   | 1.65 | 62                                    | E   | 1.05 | 96.7                       | F   | 1.22 | 160                               | F   | 1.43 | 67                                                           | E   | 1.05 |

**Freeway Segments – Significantly Affected Only**

| Segment Direction | Segment Description                                        | Segment Type | 2041 No Action Alternative |     |         |     | 2041 Preferred Action Alternative |     |         |     | 2041 Preferred Action Alternative with Mitigation Scenario C |     |         |     |
|-------------------|------------------------------------------------------------|--------------|----------------------------|-----|---------|-----|-----------------------------------|-----|---------|-----|--------------------------------------------------------------|-----|---------|-----|
|                   |                                                            |              | 6 AM                       |     | 7 AM    |     | 6 AM                              |     | 7 AM    |     | 6 AM                                                         |     | 7 AM    |     |
|                   |                                                            |              | Density                    | LOS | Density | LOS | Density                           | LOS | Density | LOS | Density                                                      | LOS | Density | LOS |
| I-81 NB           | I-81 NB Between I-481 and NYS Route 31                     | Basic        | 4.4                        | A   | 7.1     | A   | 5.6                               | A   | 84.8    | F   | 6.9                                                          | A   | 15.1    | B   |
|                   | I-81 NB Off-Ramp to NYS Route 31                           | Diverge      | 3.5                        | A   | 5.6     | A   | 4.5                               | A   | 136.7   | F   | 4.1                                                          | A   | 8.9     | A   |
| NYS Route 481 WB  | NYS Route 481 WB Between I-81 and U.S. Route 11            | Weave        | 4.8                        | A   | 7.8     | A   | 5.9                               | A   | 48.6    | F   | 4.5                                                          | A   | 12.7    | B   |
|                   | NYS Route 481 WB Off-Ramp and On-Ramp from Circle Drive    | Basic        | 4.2                        | A   | 6.9     | A   | 5.1                               | A   | 55.8    | F   | 4.0                                                          | A   | 11.0    | B   |
|                   | NYS Route 481 WB On-Ramp from Circle Drive                 | Merge        | 5.9                        | A   | 9.8     | A   | 7.2                               | A   | 95.7    | F   | 5.6                                                          | A   | 15.4    | B   |
|                   | NYS Route 481 WB Between U.S. Route 11 and Caughdenoy Road | Basic        | 4.0                        | A   | 6.8     | A   | 5.3                               | A   | 112.6   | F   | 3.8                                                          | A   | 10.7    | B   |
|                   |                                                            |              | 4 PM                       |     | 5 PM    |     | 4 PM                              |     | 5 PM    |     | 4 PM                                                         |     | 5 PM    |     |
| NYS Route 481 WB  | NYS Route 481 WB On-Ramp from New Access Road              | Merge        | 80.7                       | F   | 170.7   | F   | 91.9                              | F   | 172.2   | F   | 17.9                                                         | B   | 19.9    | C   |
|                   | NYS Route 481 WB Between New Access Road and NYS Route 31  | Basic        | 161.7                      | F   | 162.7   | F   | 161.0                             | F   | 163.9   | F   | 9.3                                                          | A   | 10.5    | B   |

**APPENDIX C**  
**GROWTH INDUCING EFFECTS**

**Appendix C-1**  
**Growth Inducing Effects Methodology and Study Area**

## **C-1 Growth Inducing Effects**

### **C-1.1 Overview and Study Area**

SEQRA and its implementing regulations (6 NYCRR § 617.9) specify that an EIS should identify and discuss any growth inducing aspects of a proposed action, where such effects are relevant to the analysis. As described in the SEQR Handbook published by NYSDEC, the analysis in an EIS of the reasonably foreseeable indirect effects of a proposed action should include growth inducing effects, such as “effects related to changes in the pattern of land use, population density or growth rate, and air, water, and other natural systems, including ecosystems” (NYSDEC, 2020, p. 79).

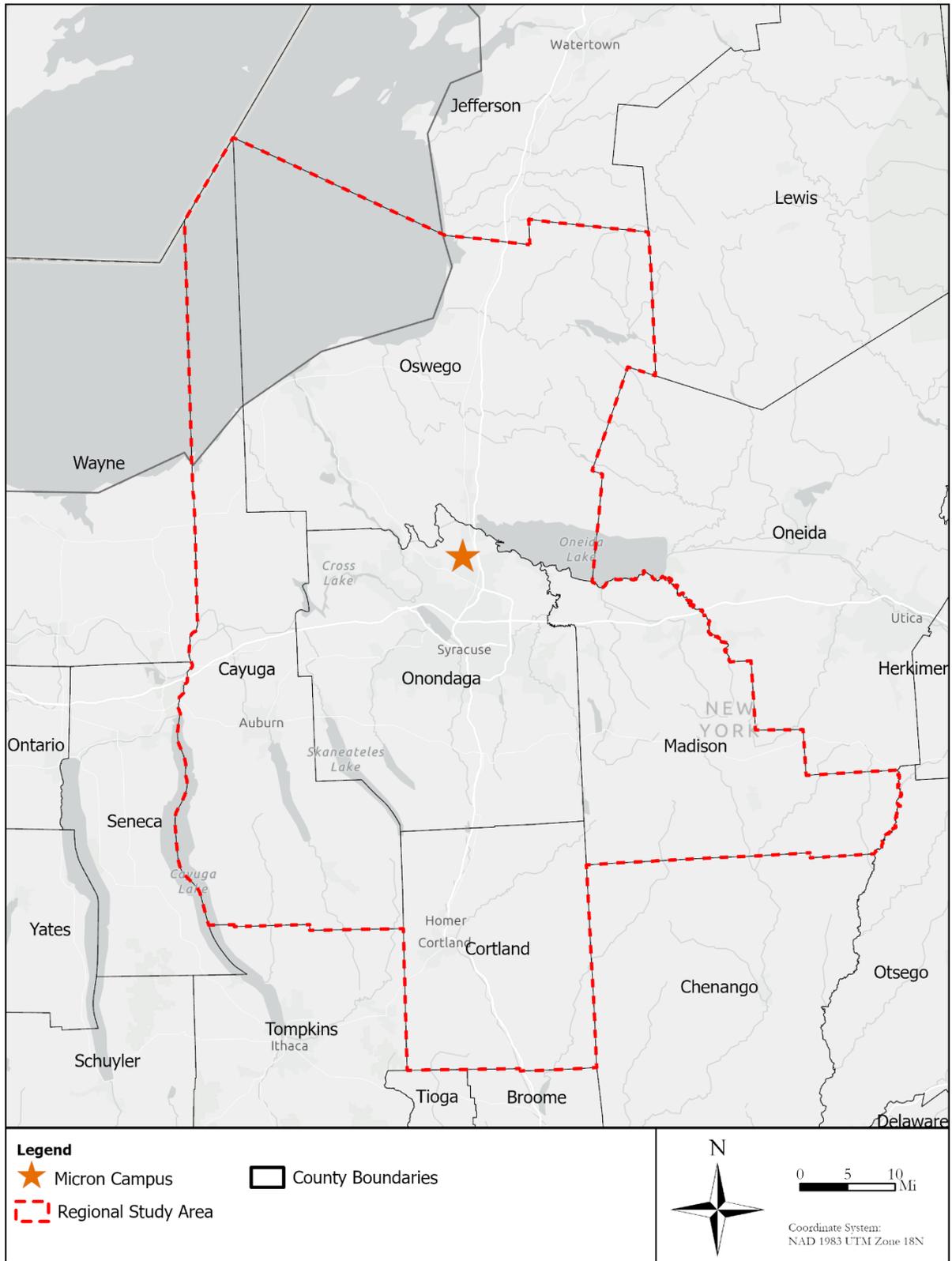
According to a 2022 study prepared by Regional Economic Models, Inc. (REMI) and sponsored by ESD (the “REMI Study”), 85 percent of induced job growth and 90 percent of induced residential growth from Micron establishing a four-fab semiconductor manufacturing facility in Onondaga County would occur within the five-county region (REMI, 2022). A copy of the REMI Study is included in Appendix C-2.

Therefore, this five-county region, shown in Figure C-1 on the next page, has been selected as the study area for analyzing growth inducing effects in this EIS. This study area represents the outer extent of the reasonably foreseeable growth inducing effects of the Preferred Action Alternative on the resource areas analyzed in the EIS, which describes such effects under Growth Inducing Effects in each section of Chapter 3. In general, although locations beyond the five-county region could experience some induced growth, such growth would likely be more limited in nature than that in the five-county region and would not occur at a scale that would be anticipated to result in significant adverse environmental effects.

Under the Preferred Action Alternative, the construction and operation of the Micron Campus in particular would be anticipated to induce job growth within the semiconductor supply chain, draw additional supply chain businesses to the area, and catalyze further development and growth in the regional economy. This economic revitalization could lead to increases in population, worker and household spending, and commercial and retail activity. At the same time, this induced growth could lead to changes in population density and land use patterns, and increased residential, commercial, and industrial activity that could produce additional effects on the surrounding human and natural environment.

The following sections provide additional information on the methodology and evaluation methods used to assess growth inducing effects in the EIS.

**Figure C-1 Growth Inducing Effects Study Area**



Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community, Sources: Esri, TomTom, Garmin, (c) OpenStreetMap contributors, and the GIS User Community

## C-1.2 Methodology and Modeling

The methodology for the growth inducing effects analysis in the EIS was developed based on a combination of the REMI Study, local planning sources, and data analytics. An analysis of growth inducing effects requires information on the types of growth anticipated, the scale and extent of growth, and where that growth is likely to occur. Therefore, the growth inducing effects analysis first considered the following broad categories of growth:

- **Increases in population:** the Preferred Action Alternative would lead to in-migration of Micron workers, supply chain workers, and other individuals attracted to the area by increased social and economic opportunities, the in-migration of the families of those groups, and the increased retention of existing residents and workers and their families who would support and benefit from increased local economic activity and household spending from additional population and labor income such groups would bring.
- **Increases in jobs and economic activity:** the Preferred Action Alternative would lead to increased economic activity, business revenues, and jobs within the semiconductor manufacturing supply chain in the region and would further stimulate other business growth, residential growth, and household consumer spending.
- **Increases in residential, commercial, and industrial development:** in-migrating workers and families would need housing, which would spur additional residential development; Micron's construction and operational activities would lead to growth in supply chain businesses supporting Micron's activities; and increases in population and labor income would spur further commercial development to support the anticipated growth in household consumer spending.

The REMI Study estimated induced job<sup>12</sup> growth and induced residential growth from the construction of a four-fab facility at the proposed Micron Campus site that would be likely to occur between 2025 and 2055.<sup>13</sup> These induced growth estimates indicate the overall extent and scale of anticipated induced growth in the five-county region as a whole, but the study was not intended to provide induced growth projections at a smaller scale.

To develop a more granular analysis of growth inducing effects at the community level, the EIS used information and data from local planning sources compiled by the Syracuse Metropolitan Transportation Authority (SMTA) to develop a model of induced household growth at the town, city, and county levels. The model distributed the REMI Study's induced population growth projections by municipality as follows:

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<sup>12</sup> Although the REMI Study defined "induced jobs" as those jobs that would be generated by worker spending and "indirect jobs" as those jobs that would be generated within the semiconductor supply chain, the EIS considers both of those types of jobs as components of induced growth.

<sup>13</sup> The REMI Study found that induced population growth in the five-county region would be primarily driven by economic in-migration to the region due to the expanded availability of high-paying jobs. Economic in-migration is net population movement into (or out of) a region driven by changes in economic conditions such as job availability, compensation, cost of living, or taxes.

- The REMI Study’s induced population growth projections were converted to estimated numbers of induced households, based on a 2.31 persons-per-household assumption derived from 2016-2021 U.S. Census Bureau American Community Survey (ACS) data for the five-county region.
- The total induced households were apportioned into the following household types:
  - ▶ Micron construction workers and their families who would in-migrate to the region based on construction jobs at the Micron Campus. The estimated number of in-migrating construction workers is based on Micron’s estimated construction labor demand relative to the construction labor force supply within an approximately 90-mile radius of the Micron Campus, and assumes one Micron construction worker per in-migrating household.
  - ▶ Micron operational workers and their families who would in-migrate to the region for an operational job at the Micron Campus. The estimated number of in-migrating Micron operational workers is based on Micron’s estimated operational labor demand relative to an average 28 percent worker in-migration rate that has occurred at Micron’s existing facilities in Boise, ID and Manassas, VA, and assumes one Micron operational worker per in-migrating household.
  - ▶ Other workers and their families (also assuming one induced worker per household) who would in-migrate to the area to meet the growth in labor demand within Micron’s supply chain and the consumer needs from the induced population growth, as well as individuals and families attracted to the area by increased social and economic opportunities.
- The total induced households were then distributed to municipalities within the five-county region based on the known characteristics of these household types:
  - ▶ In-migrating Micron construction worker households were distributed based in part on ACS data on commuting distances within Onondaga County and for construction workers nationally. The modeling also accounted for existing population densities, short-term housing supply constraints that could push worker housing farther out than shorter commuting distances, and Micron’s intention to reimburse certain work-related travel expenses for construction workers traveling from as far away as 90 miles from the Micron Campus.
  - ▶ In-migrating Micron operational worker households also were distributed based on existing population densities and ACS data on commuting distances, including U.S. Census Bureau OnTheMap data on residence-to-workplace distances in the census tract where the Micron Campus would be located and the census tracts for Micron’s existing facilities in Boise, ID and Manassas, VA and the GlobalFoundries semiconductor facilities in Malta, NY, taking into account changing patterns in commuting distances from before and after those facilities began operations.
  - ▶ Other workers and their families who would be employed at supply chain businesses and other commercial businesses serving anticipated household consumer spending

growth were distributed not based on potential proximity to the Micron Campus but on existing municipal population densities within the five-county region; in-migrating residents who would be attracted to the region due to increased social and economic opportunities and who would not necessarily be tied to induced jobs also were distributed based on existing municipal population densities.

Because a vast majority of the projected in-migrating residents would not be employed with Micron, the modeled distribution of the REMI Study induced population projections as described above was not heavily concentrated around the Micron Campus location.

Separate from the modeling described above, SMTC generated future household and job growth projections for the Syracuse Metropolitan Planning Area (MPA) (all of Onondaga County, plus the Towns of Hastings, Schroepfel, and West Monroe in Oswego County), including anticipated growth associated with the Proposed Project. To generate these projections, SMTC staff met with local planning agencies, including representatives from the City of Syracuse, Onondaga County, and CenterState CEO, who identified general and site-specific locations of planned and anticipated household and employment growth or decline in their geographic areas of expertise. SMTC developed MPA projections for 2040 and 2050 based on this information, the REMI Study projections, and its local knowledge of other anticipated growth.

SMTC's MPA projections indicated a larger degree of induced growth than the modeling described above, whereas assuming the REMI Study's regional projections as an upper limit on the SMTC projections results in a reduced degree of induced growth occurring outside of the MPA but within the five-county region. Therefore, the EIS developed low- and high-range estimates of induced household growth at the town, city, and county levels to conservatively demonstrate the range of possible induced growth based on these varying information sources.

Induced commercial and industrial business growth within the semiconductor supply chain, and increased consumer demand generated by population increases, also would be anticipated to occur in the five-county region in addition to the induced household growth described above. The REMI Study did not provide estimates for induced commercial or industrial business growth, and it would be difficult to determine how much of that growth would occur largely within or through expansions of existing facilities versus through establishment of new facilities. Given the scale of anticipated supply chain growth and new worker and household spending, it is reasonable to assume that substantial new commercial and industrial development would occur over time. However, it would be premature to estimate ranges for such incremental commercial and industrial development at the municipal or regional level at this time.

### **C-1.3 Induced Growth Estimates**

As described above, the EIS developed a model of future induced household growth at the town, city, and county levels. Although it is not possible to predict all of the specific locations and sites where induced development would occur over time (including because such development would be subject to applicable laws and regulations, including local zoning requirements, site plan approvals, and other discretionary actions requiring separate site-specific reviews), the municipal and county level estimates indicate the potential scale of such induced growth, and inform the discussion of potential Growth Inducing Effects in the EIS.

The following tables show the induced growth projections developed based on the methodology and modeling described in the previous section. The projections are shown as low- and high-range estimated percentage changes compared to 2023 estimated household numbers at the municipal and county levels the five-county region for the years 2035 and 2041. Table C-1 and C-2 show the total induced growth projections at the county level in 2035 and 2041. The remaining tables show the municipal projections within each county for those years.<sup>14</sup>

**Table C-1 Induced Growth Projections by County (2035)**

| Geographic Area | Estimated Households in 2023 | Micron Induced Households |        | Percent Increase in Households over 2023 |      |
|-----------------|------------------------------|---------------------------|--------|------------------------------------------|------|
|                 |                              | Low                       | High   | Low                                      | High |
| Onondaga County | 194,963                      | 12,727                    | 18,223 | 6.5%                                     | 9.3% |
| Oswego County   | 47,132                       | 1,438                     | 3,721  | 3.1%                                     | 7.9% |
| Madison County  | 25,563                       | 751                       | 1,943  | 2.9%                                     | 7.6% |
| Cayuga County   | 31,334                       | 808                       | 2,090  | 2.6%                                     | 6.7% |
| Cortland County | 18,768                       | 464                       | 1,201  | 2.5%                                     | 6.4% |

**Table C-2 Induced Growth Projections by County (2041)**

| Geographic Area | Estimated Households in 2023 | Micron Induced Households |        | Percent Increase in Households over 2023 |       |
|-----------------|------------------------------|---------------------------|--------|------------------------------------------|-------|
|                 |                              | Low                       | High   | Low                                      | High  |
| Onondaga County | 194,963                      | 16,568                    | 23,518 | 8.5%                                     | 12.1% |
| Oswego County   | 47,132                       | 1,674                     | 4,561  | 3.6%                                     | 9.7%  |
| Madison County  | 25,563                       | 874                       | 2,382  | 3.4%                                     | 9.3%  |
| Cayuga County   | 31,334                       | 940                       | 2,562  | 3.0%                                     | 8.2%  |
| Cortland County | 18,768                       | 540                       | 1,473  | 2.9%                                     | 7.8%  |

<sup>14</sup> All tables in this Appendix are projections developed by AKRF, Inc. based on data from the REMI Study, existing household data contained in U.S. Census Bureau ACS 2019-2023 5-year estimates, and SMTC growth projections. The induced household growth estimates presented in the tables include all Proposed Project-induced new populations, including: in-migrating Micron workers and families; retained and in-migrating supply chain workers and families; retained and in-migrating workers and families supporting increased household and consumer spending; and other retained and in-migrating residents attracted to the region by increased social and economic opportunities. Totals may not sum due to rounding.

**Table C-3 Induced Growth in Onondaga County (2035)**

| Geographic Area                | Estimated Households in 2022 | Micron Induced Households |               | Percent Increase in Households over 2022 |             |
|--------------------------------|------------------------------|---------------------------|---------------|------------------------------------------|-------------|
|                                |                              | Low                       | High          | Low                                      | High        |
| <b>Onondaga County (Total)</b> | <b>194,963</b>               | <b>12,727</b>             | <b>18,223</b> | <b>6.5%</b>                              | <b>9.3%</b> |
| Camillus                       | 10,785                       | 539                       | 772           | 5.0%                                     | 7.2%        |
| Cicero                         | 12,635                       | 1,270                     | 1,819         | 10.1%                                    | 14.4%       |
| Clay                           | 25,143                       | 2,092                     | 2,996         | 8.3%                                     | 11.9%       |
| Dewitt                         | 10,332                       | 796                       | 1,140         | 7.7%                                     | 11.0%       |
| Elbridge                       | 2,339                        | 101                       | 144           | 4.3%                                     | 6.2%        |
| Fabius                         | 825                          | 16                        | 22            | 1.9%                                     | 2.7%        |
| Geddes                         | 7,187                        | 195                       | 280           | 2.7%                                     | 3.9%        |
| LaFayette                      | 1,942                        | 71                        | 101           | 3.7%                                     | 5.2%        |
| Lysander                       | 9,002                        | 754                       | 1,080         | 8.4%                                     | 12.0%       |
| Manilius                       | 13,830                       | 789                       | 1,130         | 5.7%                                     | 8.2%        |
| Marcellus                      | 2,629                        | 129                       | 185           | 4.9%                                     | 7.0%        |
| Onondaga (town)                | 8,640                        | 610                       | 873           | 7.1%                                     | 10.1%       |
| Onondaga Nation                | 192                          | -                         | -             | -                                        | -           |
| Otisco                         | 934                          | 30                        | 43            | 3.2%                                     | 4.6%        |
| Pompey                         | 2,812                        | 97                        | 139           | 3.4%                                     | 4.9%        |
| Salina                         | 15,205                       | 544                       | 779           | 3.6%                                     | 5.1%        |
| Skaneateles                    | 3,037                        | 104                       | 148           | 3.4%                                     | 4.9%        |
| Spafford                       | 730                          | 19                        | 27            | 2.6%                                     | 3.7%        |
| Syracuse                       | 59,286                       | 4,097                     | 5,866         | 6.9%                                     | 9.9%        |
| Tully                          | 1,016                        | 41                        | 59            | 4.0%                                     | 5.8%        |
| Van Buren                      | 6,462                        | 433                       | 620           | 6.7%                                     | 9.6%        |

**Table C-4 Induced Growth in Onondaga County (2041)**

| Geographic Area                | Estimated Households in 2023 | Micron Induced Households |               | Percent Increase in Households over 2023 |              |
|--------------------------------|------------------------------|---------------------------|---------------|------------------------------------------|--------------|
|                                |                              | Low                       | High          | Low                                      | High         |
| <b>Onondaga County (Total)</b> | <b>194,963</b>               | <b>16,568</b>             | <b>23,518</b> | <b>8.5%</b>                              | <b>12.1%</b> |
| Camillus                       | 10,785                       | 702                       | 996           | 6.5%                                     | 9.2%         |
| Cicero                         | 12,635                       | 1,654                     | 2,348         | 13.1%                                    | 18.6%        |
| Clay                           | 25,143                       | 2,724                     | 3,866         | 10.8%                                    | 15.4%        |
| Dewitt                         | 10,332                       | 1,036                     | 1,471         | 10.0%                                    | 14.2%        |
| Elbridge                       | 2,339                        | 131                       | 186           | 5.6%                                     | 8.0%         |
| Fabius                         | 825                          | 20                        | 29            | 2.4%                                     | 3.5%         |
| Geddes                         | 7,187                        | 254                       | 361           | 3.5%                                     | 5.0%         |
| LaFayette                      | 1,942                        | 92                        | 131           | 4.7%                                     | 6.7%         |
| Lysander                       | 9,002                        | 982                       | 1,394         | 10.9%                                    | 15.5%        |
| Manlius                        | 13,830                       | 1,028                     | 1,459         | 7.4%                                     | 10.5%        |
| Marcellus                      | 2,629                        | 168                       | 238           | 6.4%                                     | 9.1%         |
| Onondaga (town)                | 8,640                        | 794                       | 1,126         | 9.2%                                     | 13.0%        |
| Onondaga Nation                | 192                          | -                         | -             | -                                        | -            |
| Otisco                         | 934                          | 39                        | 56            | 4.2%                                     | 6.0%         |
| Pompey                         | 2,812                        | 126                       | 179           | 4.5%                                     | 6.4%         |
| Salina                         | 15,205                       | 708                       | 1,005         | 4.7%                                     | 6.6%         |
| Skaneateles                    | 3,037                        | 135                       | 192           | 4.4%                                     | 6.3%         |
| Spafford                       | 730                          | 25                        | 35            | 3.4%                                     | 4.8%         |
| Syracuse                       | 59,286                       | 5,333                     | 7,570         | 9.0%                                     | 12.8%        |
| Tully                          | 1,016                        | 54                        | 76            | 5.3%                                     | 7.5%         |
| Van Buren                      | 6,462                        | 564                       | 800           | 8.7%                                     | 12.4%        |

**Table C-5 Induced Growth in Oswego County (2035)**

| Geographic Area              | Estimated Households in 2023 | Micron Induced Households |              | Percent Increase in Households over 2023 |             |
|------------------------------|------------------------------|---------------------------|--------------|------------------------------------------|-------------|
|                              |                              | Low                       | High         | Low                                      | High        |
| <b>Oswego County (Total)</b> | <b>47,132</b>                | <b>1,438</b>              | <b>3,721</b> | <b>3.1%</b>                              | <b>7.9%</b> |
| Albion                       | 709                          | 20                        | 54           | 2.9%                                     | 7.6%        |
| Amboy                        | 487                          | 14                        | 37           | 2.9%                                     | 7.6%        |
| Boylston                     | 256                          | 7                         | 19           | 2.9%                                     | 7.6%        |
| Constantia                   | 1,879                        | 64                        | 161          | 3.4%                                     | 8.6%        |
| Fulton                       | 4,782                        | 138                       | 364          | 2.9%                                     | 7.6%        |
| Granby                       | 2,657                        | 77                        | 202          | 2.9%                                     | 7.6%        |
| Hannibal                     | 1,781                        | 51                        | 135          | 2.9%                                     | 7.6%        |
| Hastings                     | 3,851                        | 132                       | 329          | 3.4%                                     | 8.6%        |
| Mexico                       | 2,269                        | 66                        | 173          | 2.9%                                     | 7.6%        |
| Minetto                      | 691                          | 20                        | 53           | 2.9%                                     | 7.6%        |
| New Haven                    | 1,107                        | 32                        | 84           | 2.9%                                     | 7.6%        |
| Orwell                       | 370                          | 11                        | 28           | 2.9%                                     | 7.6%        |
| Oswego city                  | 7,256                        | 210                       | 552          | 2.9%                                     | 7.6%        |
| Oswego town                  | 1,874                        | 54                        | 143          | 2.9%                                     | 7.6%        |
| Palermo                      | 1,220                        | 42                        | 104          | 3.4%                                     | 8.6%        |
| Parish                       | 1,042                        | 30                        | 79           | 2.9%                                     | 7.6%        |
| Redfield                     | 168                          | 5                         | 13           | 2.9%                                     | 7.6%        |
| Richland                     | 2,337                        | 68                        | 178          | 2.9%                                     | 7.6%        |
| Sandy Creek                  | 1,610                        | 47                        | 122          | 2.9%                                     | 7.6%        |
| Schroepfel                   | 3,385                        | 116                       | 290          | 3.4%                                     | 8.6%        |
| Scriba                       | 2,809                        | 81                        | 214          | 2.9%                                     | 7.6%        |
| Volney                       | 2,346                        | 80                        | 201          | 3.4%                                     | 8.6%        |
| West Monroe                  | 1,707                        | 58                        | 146          | 3.4%                                     | 8.6%        |
| Williamstown                 | 539                          | 16                        | 41           | 2.9%                                     | 7.6%        |

**Table C-6 Induced Growth in Oswego County (2041)**

| Geographic Area              | Estimated Households in 2023 | Micron Induced Households |              | Percent Increase in Households over 2023 |             |
|------------------------------|------------------------------|---------------------------|--------------|------------------------------------------|-------------|
|                              |                              | Low                       | High         | Low                                      | High        |
| <b>Oswego County (Total)</b> | <b>47,132</b>                | <b>1,674</b>              | <b>4,561</b> | <b>3.6%</b>                              | <b>9.7%</b> |
| Albion                       | 709                          | 24                        | 66           | 3.4%                                     | 9.4%        |
| Amboy                        | 487                          | 16                        | 46           | 3.4%                                     | 9.4%        |
| Boylston                     | 256                          | 9                         | 24           | 3.4%                                     | 9.4%        |
| Constantia                   | 1,879                        | 74                        | 195          | 3.9%                                     | 10.4%       |
| Fulton                       | 4,782                        | 162                       | 448          | 3.4%                                     | 9.4%        |
| Granby                       | 2,657                        | 90                        | 249          | 3.4%                                     | 9.4%        |
| Hannibal                     | 1,781                        | 60                        | 167          | 3.4%                                     | 9.4%        |
| Hastings                     | 3,851                        | 152                       | 400          | 3.9%                                     | 10.4%       |
| Mexico                       | 2,269                        | 77                        | 212          | 3.4%                                     | 9.4%        |
| Minetto                      | 691                          | 23                        | 65           | 3.4%                                     | 9.4%        |
| New Haven                    | 1,107                        | 37                        | 104          | 3.4%                                     | 9.4%        |
| Orwell                       | 370                          | 13                        | 35           | 3.4%                                     | 9.4%        |
| Oswego city                  | 7,256                        | 245                       | 679          | 3.4%                                     | 9.4%        |
| Oswego town                  | 1,874                        | 63                        | 175          | 3.4%                                     | 9.4%        |
| Palermo                      | 1,220                        | 48                        | 127          | 3.9%                                     | 10.4%       |
| Parish                       | 1,042                        | 35                        | 98           | 3.4%                                     | 9.4%        |
| Redfield                     | 168                          | 6                         | 16           | 3.4%                                     | 9.4%        |
| Richland                     | 2,337                        | 79                        | 219          | 3.4%                                     | 9.4%        |
| Sandy Creek                  | 1,610                        | 54                        | 151          | 3.4%                                     | 9.4%        |
| Schroepel                    | 3,385                        | 133                       | 352          | 3.9%                                     | 10.4%       |
| Scriba                       | 2,809                        | 95                        | 263          | 3.4%                                     | 9.4%        |
| Volney                       | 2,346                        | 92                        | 244          | 3.9%                                     | 10.4%       |
| West Monroe                  | 1,707                        | 67                        | 177          | 3.9%                                     | 10.4%       |
| Williamstown                 | 539                          | 18                        | 50           | 3.4%                                     | 9.4%        |

**Table C-7 Induced Growth in Madison County (2035)**

| Geographic Area               | Estimated Households in 2023 | Micron Induced Households |              | Percent Increase in Households over 2023 |             |
|-------------------------------|------------------------------|---------------------------|--------------|------------------------------------------|-------------|
|                               |                              | Low                       | High         | Low                                      | High        |
| <b>Madison County (Total)</b> | <b>25,563</b>                | <b>751</b>                | <b>1,943</b> | <b>2.9%</b>                              | <b>7.6%</b> |
| Brookfield                    | 839                          | 24                        | 62           | 2.8%                                     | 7.4%        |
| Cazenovia                     | 2,479                        | 74                        | 190          | 3.0%                                     | 7.7%        |
| DeRuyter                      | 518                          | 15                        | 38           | 2.8%                                     | 7.4%        |
| Eaton                         | 1,180                        | 33                        | 87           | 2.8%                                     | 7.4%        |
| Fenner                        | 682                          | 20                        | 52           | 3.0%                                     | 7.7%        |
| Georgetown                    | 223                          | 6                         | 17           | 2.8%                                     | 7.4%        |
| Hamilton                      | 1,522                        | 43                        | 113          | 2.8%                                     | 7.4%        |
| Lebanon                       | 521                          | 15                        | 39           | 2.8%                                     | 7.4%        |
| Lenox                         | 3,681                        | 109                       | 282          | 3.0%                                     | 7.7%        |
| Lincoln                       | 701                          | 21                        | 54           | 3.0%                                     | 7.7%        |
| Madison                       | 1,167                        | 33                        | 87           | 2.8%                                     | 7.4%        |
| Nelson                        | 778                          | 23                        | 60           | 3.0%                                     | 7.7%        |
| Oneida                        | 4,519                        | 134                       | 346          | 3.0%                                     | 7.7%        |
| Smithfield                    | 447                          | 13                        | 34           | 3.0%                                     | 7.7%        |
| Stockbridge                   | 729                          | 22                        | 56           | 3.0%                                     | 7.7%        |
| Sullivan                      | 5,577                        | 166                       | 427          | 3.0%                                     | 7.7%        |

**Table C-8 Induced Growth in Madison County (2041)**

| Geographic Area               | Estimated Households in 2023 | Micron Induced Households |              | Percent Increase in Households over 2023 |             |
|-------------------------------|------------------------------|---------------------------|--------------|------------------------------------------|-------------|
|                               |                              | Low                       | High         | Low                                      | High        |
| <b>Madison County (Total)</b> | <b>25,563</b>                | <b>874</b>                | <b>2,382</b> | <b>3.4%</b>                              | <b>9.3%</b> |
| Brookfield                    | 839                          | 28                        | 76           | 3.3%                                     | 9.1%        |
| Cazenovia                     | 2,479                        | 86                        | 233          | 3.5%                                     | 9.4%        |
| DeRuyter                      | 518                          | 17                        | 47           | 3.3%                                     | 9.1%        |
| Eaton                         | 1,180                        | 39                        | 108          | 3.3%                                     | 9.1%        |
| Fenner                        | 682                          | 24                        | 64           | 3.5%                                     | 9.4%        |
| Georgetown                    | 223                          | 7                         | 20           | 3.3%                                     | 9.1%        |
| Hamilton                      | 1,522                        | 50                        | 139          | 3.3%                                     | 9.1%        |
| Lebanon                       | 521                          | 17                        | 47           | 3.3%                                     | 9.1%        |
| Lenox                         | 3,681                        | 127                       | 345          | 3.5%                                     | 9.4%        |
| Lincoln                       | 701                          | 24                        | 66           | 3.5%                                     | 9.4%        |
| Madison                       | 1,167                        | 39                        | 106          | 3.3%                                     | 9.1%        |
| Nelson                        | 778                          | 27                        | 73           | 3.5%                                     | 9.4%        |
| Oneida                        | 4,519                        | 156                       | 424          | 3.5%                                     | 9.4%        |
| Smithfield                    | 447                          | 15                        | 42           | 3.5%                                     | 9.4%        |
| Stockbridge                   | 729                          | 25                        | 68           | 3.5%                                     | 9.4%        |
| Sullivan                      | 5,577                        | 193                       | 523          | 3.5%                                     | 9.4%        |

**Table C-9 Induced Growth in Cayuga County (2035)**

| Geographic Area              | Estimated Households in 2023 | Micron Induced Households |              | Percent Increase in Households over 2023 |             |
|------------------------------|------------------------------|---------------------------|--------------|------------------------------------------|-------------|
|                              |                              | Low                       | High         | Low                                      | High        |
| <b>Cayuga County (Total)</b> | <b>31,334</b>                | <b>808</b>                | <b>2,090</b> | <b>2.6%</b>                              | <b>6.7%</b> |
| Auburn                       | 11,758                       | 310                       | 796          | 2.6%                                     | 6.8%        |
| Aurelius                     | 1,097                        | 27                        | 70           | 2.4%                                     | 6.4%        |
| Brutus                       | 1,873                        | 49                        | 127          | 2.6%                                     | 6.8%        |
| Cato                         | 1,100                        | 29                        | 74           | 2.6%                                     | 6.8%        |
| Conquest                     | 683                          | 18                        | 46           | 2.6%                                     | 6.8%        |
| Fleming                      | 991                          | 24                        | 63           | 2.4%                                     | 6.4%        |
| Genoa                        | 652                          | 16                        | 42           | 2.4%                                     | 6.4%        |
| Ira                          | 786                          | 21                        | 53           | 2.6%                                     | 6.8%        |
| Ledyard                      | 602                          | 15                        | 38           | 2.4%                                     | 6.4%        |
| Locke                        | 741                          | 18                        | 47           | 2.4%                                     | 6.4%        |
| Mentz                        | 828                          | 22                        | 56           | 2.6%                                     | 6.8%        |
| Montezuma                    | 496                          | 13                        | 34           | 2.6%                                     | 6.8%        |
| Moravia                      | 1,020                        | 25                        | 65           | 2.4%                                     | 6.4%        |
| Niles                        | 498                          | 12                        | 32           | 2.4%                                     | 6.4%        |
| Owasco                       | 1,655                        | 44                        | 112          | 2.6%                                     | 6.8%        |
| Scipio                       | 578                          | 14                        | 37           | 2.4%                                     | 6.4%        |
| Sempronius                   | 304                          | 7                         | 19           | 2.4%                                     | 6.4%        |
| Sennett                      | 1,256                        | 33                        | 85           | 2.6%                                     | 6.8%        |
| Springport                   | 914                          | 22                        | 58           | 2.4%                                     | 6.4%        |
| Sterling                     | 1,410                        | 37                        | 95           | 2.6%                                     | 6.8%        |
| Summerhill                   | 379                          | 9                         | 24           | 2.4%                                     | 6.4%        |
| Throop                       | 698                          | 18                        | 47           | 2.6%                                     | 6.8%        |
| Venice                       | 457                          | 11                        | 29           | 2.4%                                     | 6.4%        |
| Victory                      | 558                          | 15                        | 38           | 2.6%                                     | 6.8%        |

**Table C-10 Induced Growth in Cayuga County (2041)**

| Geographic Area              | Estimated Households in 2023 | Micron Induced Households |              | Percent Increase in Households over 2023 |             |
|------------------------------|------------------------------|---------------------------|--------------|------------------------------------------|-------------|
|                              |                              | Low                       | High         | Low                                      | High        |
| <b>Cayuga County (Total)</b> | <b>31,334</b>                | <b>940</b>                | <b>2,562</b> | <b>3.0%</b>                              | <b>8.2%</b> |
| Auburn                       | 11,758                       | 360                       | 974          | 3.1%                                     | 8.3%        |
| Aurelius                     | 1,097                        | 31                        | 86           | 2.8%                                     | 7.9%        |
| Brutus                       | 1,873                        | 57                        | 155          | 3.1%                                     | 8.3%        |
| Cato                         | 1,100                        | 34                        | 91           | 3.1%                                     | 8.3%        |
| Conquest                     | 683                          | 21                        | 57           | 3.1%                                     | 8.3%        |
| Fleming                      | 991                          | 28                        | 78           | 2.8%                                     | 7.9%        |
| Genoa                        | 652                          | 18                        | 51           | 2.8%                                     | 7.9%        |
| Ira                          | 786                          | 24                        | 65           | 3.1%                                     | 8.3%        |
| Ledyard                      | 602                          | 17                        | 47           | 2.8%                                     | 7.9%        |
| Locke                        | 741                          | 21                        | 58           | 2.8%                                     | 7.9%        |
| Mentz                        | 828                          | 25                        | 69           | 3.1%                                     | 8.3%        |
| Montezuma                    | 496                          | 15                        | 41           | 3.1%                                     | 8.3%        |
| Moravia                      | 1,020                        | 29                        | 80           | 2.8%                                     | 7.9%        |
| Niles                        | 498                          | 14                        | 39           | 2.8%                                     | 7.9%        |
| Owasco                       | 1,655                        | 51                        | 137          | 3.1%                                     | 8.3%        |
| Scipio                       | 578                          | 16                        | 46           | 2.8%                                     | 7.9%        |
| Sempronius                   | 304                          | 9                         | 24           | 2.8%                                     | 7.9%        |
| Sennett                      | 1,256                        | 38                        | 104          | 3.1%                                     | 8.3%        |
| Springport                   | 914                          | 26                        | 72           | 2.8%                                     | 7.9%        |
| Sterling                     | 1,410                        | 43                        | 117          | 3.1%                                     | 8.3%        |
| Summerhill                   | 379                          | 11                        | 30           | 2.8%                                     | 7.9%        |
| Throop                       | 698                          | 21                        | 58           | 3.1%                                     | 8.3%        |
| Venice                       | 457                          | 13                        | 36           | 2.8%                                     | 7.9%        |
| Victory                      | 558                          | 17                        | 46           | 3.1%                                     | 8.3%        |

**Table C-11 Induced Growth in Cortland County (2035)**

| Geographic Area                | Estimated Households in 2023 | Micron Induced Households |              | Percent Increase in Households over 2023 |             |
|--------------------------------|------------------------------|---------------------------|--------------|------------------------------------------|-------------|
|                                |                              | Low                       | High         | Low                                      | High        |
| <b>Cortland County (Total)</b> | <b>18,768</b>                | <b>464</b>                | <b>1,201</b> | <b>2.5%</b>                              | <b>6.4%</b> |
| Cincinnatus                    | 429                          | 9                         | 25           | 2.2%                                     | 5.9%        |
| Cortland City                  | 6,992                        | 153                       | 411          | 2.2%                                     | 5.9%        |
| Cortlandville                  | 3,209                        | 70                        | 189          | 2.2%                                     | 5.9%        |
| Cuyler                         | 288                          | 10                        | 24           | 3.5%                                     | 8.3%        |
| Freetown                       | 326                          | 7                         | 19           | 2.2%                                     | 5.9%        |
| Harford                        | 413                          | 9                         | 24           | 2.2%                                     | 5.9%        |
| Homer                          | 2,786                        | 98                        | 231          | 3.5%                                     | 8.3%        |
| Lapeer                         | 293                          | 6                         | 17           | 2.2%                                     | 5.9%        |
| Marathon                       | 749                          | 16                        | 44           | 2.2%                                     | 5.9%        |
| Preble                         | 560                          | 20                        | 46           | 3.5%                                     | 8.3%        |
| Scott                          | 377                          | 8                         | 22           | 2.2%                                     | 5.9%        |
| Solon                          | 379                          | 8                         | 22           | 2.2%                                     | 5.9%        |
| Taylor                         | 159                          | 3                         | 9            | 2.2%                                     | 5.9%        |
| Truxton                        | 457                          | 16                        | 38           | 3.5%                                     | 8.3%        |
| Virgil                         | 1,028                        | 22                        | 60           | 2.2%                                     | 5.9%        |
| Willet                         | 323                          | 7                         | 19           | 2.2%                                     | 5.9%        |

**Table C-12 Induced Growth in Cortland County (2041)**

| Geographic Area                | Estimated Households in 2023 | Micron Induced Households |              | Percent Increase in Households over 2023 |             |
|--------------------------------|------------------------------|---------------------------|--------------|------------------------------------------|-------------|
|                                |                              | Low                       | High         | Low                                      | High        |
| <b>Cortland County (Total)</b> | <b>18,768</b>                | <b>540</b>                | <b>1,473</b> | <b>2.9%</b>                              | <b>7.8%</b> |
| Cincinnatus                    | 429                          | 11                        | 31           | 2.6%                                     | 7.3%        |
| Cortland City                  | 6,992                        | 179                       | 509          | 2.6%                                     | 7.3%        |
| Cortlandville                  | 3,209                        | 82                        | 234          | 2.6%                                     | 7.3%        |
| Cuyler                         | 288                          | 12                        | 28           | 4.0%                                     | 9.9%        |
| Freetown                       | 326                          | 8                         | 24           | 2.6%                                     | 7.3%        |
| Harford                        | 413                          | 11                        | 30           | 2.6%                                     | 7.3%        |
| Homer                          | 2,786                        | 111                       | 275          | 4.0%                                     | 9.9%        |
| Lapeer                         | 293                          | 8                         | 21           | 2.6%                                     | 7.3%        |
| Marathon                       | 749                          | 19                        | 55           | 2.6%                                     | 7.3%        |
| Preble                         | 560                          | 22                        | 55           | 4.0%                                     | 9.9%        |
| Scott                          | 377                          | 10                        | 27           | 2.6%                                     | 7.3%        |
| Solon                          | 379                          | 10                        | 28           | 2.6%                                     | 7.3%        |
| Taylor                         | 159                          | 4                         | 12           | 2.6%                                     | 7.3%        |
| Truxton                        | 457                          | 18                        | 45           | 4.0%                                     | 9.9%        |
| Virgil                         | 1,028                        | 26                        | 75           | 2.6%                                     | 7.3%        |
| Willet                         | 323                          | 8                         | 24           | 2.6%                                     | 7.3%        |

### References

New York State Department of Environmental Conservation (NYSDEC). (2020). The SEQR Handbook, Fourth Edition, 2020. Division of Environmental Permits.  
[https://www.dec.ny.gov/docs/permits\\_ej\\_operations\\_pdf/seqrhandbook.pdf](https://www.dec.ny.gov/docs/permits_ej_operations_pdf/seqrhandbook.pdf).

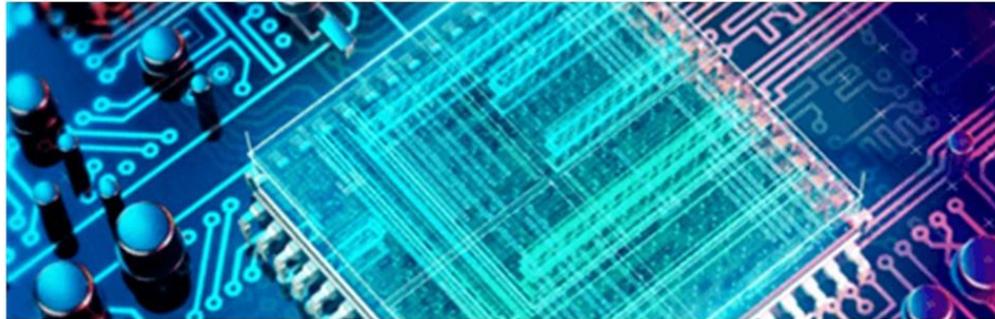
Regional Economic Models, Inc. (REMI). (2022). *Economic and fiscal impact of establishing a semiconductor manufacturing facility in Onondaga County, New York.*

## **Appendix C-2**

### **REMI Study**



Regional Economic Models, Inc.



# Economic and Fiscal Impact of Establishing a Semiconductor Manufacturing Facility in Onondaga County, New York

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September 29, 2022

Sponsor  
Empire State Development



**Empire State  
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# Executive Summary

Micron Technology, Inc., a manufacturing company is considering a project to construct, fit-out, and equip several large facilities in Onondaga County, New York. Regional Economic Models, Inc. (REMI) was retained by Empire State Development to perform an economic and fiscal impact analysis of the facility at the state and local levels. REMI analyzed the facility's economic and fiscal impacts over the period 2025-2055 using a New York-specific multi-regional Tax-PI model.

The company would ramp up operations over two phases (Phase 1: 2025-2034, Phase 2: 2035-2044) while investing \$99.6 billion capital investment (construction and machinery and equipment). In addition, there would be infrastructure (utility construction) and other investments of \$1.5 billion. Ongoing direct employment in the facility would be 9,005 jobs as of 2045. Additionally, there would be Research and Development (R&D) spending of \$3.3 billion over the period 2026-2045. Given the propensity of chip fabs to remain in operation for decades, the economic impact analysis conservatively assumed an additional 11 years of operations on top of the 20-year period in which Phases 1 and 2 capital expenditures would be completed. R&D spending would continue over the period 2046-2055. This direct activity and spending would be accompanied by ongoing employment of 5,772 in-state resident and 1,924 out-of-state visiting contractors as of 2036.

REMI analyzed the facility's economic and fiscal impacts over the period 2025-2055 using a New York-specific multi-regional Tax-PI model, and found the following key results:<sup>1</sup>

- The facility would create an average annual employment impact of 45,418 at the state level over the time period 2025-2055, with 39,975 of those jobs coming from the Central New York region.
- For every direct company hire<sup>2</sup>, there would be about 5.5 other jobs created in the state economy.<sup>3</sup>
- By 2055, the facility would create 50,911 jobs at the state level (44,943 of which would be based in Central New York), including 9,005 of the facility's direct hires and 9,431 indirect and 32,474 induced jobs (indirect and induced 41,905).
- The average annual total investment employment impact associated with the capital and other infrastructure spending (2025-2044) would be 11,871 (6,647 direct; 1,146 indirect; 4,079 induced). In terms of the direct investment employment, construction related jobs would be over 84 percent (5,595) on average during the 2025-2044 timeframe.

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<sup>1</sup> Unless stated otherwise, annual averages are over the entire 31-year period (2025-2055). Figures and numbers may not add-up exactly due to rounding.

<sup>2</sup> These refer to the facility's direct hires as well as jobs directly associated with the capital investments.

<sup>3</sup> Direct company hires are also referred to as Direct Operations Employment.

- The facility would grow the state economy significantly, adding an annual average of \$16.7 billion in real economic output and \$9.6 billion in real Gross Domestic Product (GDP) over the time period 2025-2055.<sup>4</sup>
- The facility would add an annual average of 59,575 in state population over the time period 2025-2055.
- The facility would add an annual average of \$5.4 billion in real disposable personal income for New York residents over the time period 2025-2055.
- The facility would generate an average annual increase of \$378.5 million in real state government revenue, for a present value (PV) of \$7.1 billion over 2025-2055 using a three percent discount rate, and a fiscal benefit-cost ratio of 2.0 relative to the PV of proposed real New York State incentives at a three percent discount rate.<sup>5</sup>
- The facility would generate an average annual increase of \$565.5 million in real revenue to local governments in New York State, for a PV of \$10.7 billion over 2025-2055 using a three percent discount rate. Most of these revenue gains would occur in Central New York region.
- The ROI real Gross Domestic Product ratio would be 51.5 using a three percent discount rate. The ROI (return on investment) real GDP ratio is defined as the PV of real GDP impact over the period 2025-2055 to the PV of real New York State Incentives over the period 2025-2055.
- *Economic Benefit* measure is defined by ESD as the sum of the real disposable personal income, real state government revenue, and real local government revenue impacts. The Economic Benefit ratio, which is calculated as the ratio of the PV of the real Economic Benefit to the PV of the real New York State Incentives, comes out to 33.6 (using a three percent discount rate over the period 2025-2055).

The Executive Summary Table below displays the 2055, average, and PV with three percent discount rate values of employment (direct, direct operations, indirect, induced), real GDP, real economic output, real disposable personal income, real state government revenue, real local government revenue, real Economic Benefit, and real New York State Incentives. During 2025-2055, real state government revenue increases by \$378.5 million on average. Approximately 66 percent of the real revenue is from the personal income tax. The table below also isolates the direct company hires (Direct Operations) for reference.

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<sup>4</sup> For purposes of this report, real dollar figures are in fixed 2025 dollars.

<sup>5</sup> New York State incentives total \$5.8 billion current dollars, and are converted into 2025 dollars using a price deflator.

**Executive Summary Table**

|                                                                                     | 2055   | Annual Average (2025-2055) | PV (3%) |
|-------------------------------------------------------------------------------------|--------|----------------------------|---------|
| <b>Employment</b>                                                                   | 50,911 | 45,418                     |         |
| <b>Direct</b>                                                                       | 9,005  | 11,182                     |         |
| <b>Direct Operations</b>                                                            | 9,005  | 6,894                      |         |
| <b>Indirect</b>                                                                     | 9,431  | 8,294                      |         |
| <b>Induced</b>                                                                      | 32,474 | 25,943                     |         |
| <b>GDP (Millions of 2025 Dollars)</b>                                               | 13,183 | 9,601                      | 182,496 |
| <b>Output (Millions of 2025 Dollars)</b>                                            | 22,835 | 16,652                     | 317,419 |
| <b>Disposable Personal Income (Millions of 2025 Dollars)</b>                        | 8,330  | 5,429                      | 101,393 |
| <b>State Revenue (Millions of 2025 Dollars)</b>                                     | 545    | 379                        | 7,114   |
| <b>Local Government Revenue (Millions of 2025 Dollars)</b>                          | 800    | 566                        | 10,727  |
| <b>Economic Benefit (Millions of 2025 Dollars)</b>                                  | 9,674  | 6,373                      | 119,235 |
| <b>NYS Incentives \$5.8 Billion Current Dollar Offer (Millions of 2025 Dollars)</b> |        | 151                        | 3,544   |

|                                  | PV (3%) |
|----------------------------------|---------|
| <b>Fiscal Benefit-Cost Ratio</b> | 2.0     |
| <b>Economic Benefit Ratio</b>    | 33.6    |
| <b>ROI Real GDP Ratio</b>        | 51.5    |

Note: Present value calculations are over the 2025-2055 timeframe.

## REMI Background & Experience

Regional Economic Models, Inc. (REMI) is an independent company with offices in Amherst, MA and Washington, D.C. that provides non-partisan economic analysis and modeling software to its clients, who include federal, state, and local government agencies, non-profit organizations, universities, and private companies. With approximately 40 years of experience, REMI is a worldwide leader in providing dynamic regional U.S. macroeconomic and demographic models used to evaluate economic development as well as many other policy issues such as taxes, health care, transportation, energy and the environment, and trade. REMI consultative services and modeling software have been utilized on several economic development studies in New York, in addition to other semiconductor manufacturing facilities.

# REMI Glossary

**Disposable Personal Income:** Total after-tax income received by persons; it is the income available to persons for spending or saving.

**Economic Output:** The amount of production, including all intermediate goods purchased as well as value added (compensation and profit). This can also be thought of as sales or supply.

**Employment:** Employment comprises estimates of the number of jobs, full-time plus part-time, by place of work for all industries.

**GDP:** Gross Domestic Product. The market value of goods and services produced by labor and property. It is also the sum of value-added across all industries.

**Personal Income:** Income received by persons from all sources. It is the sum of wages and salaries, supplements to wages and salaries, proprietors' income, rental income, asset income, and personal current transfer receipts, net of contributions for government social insurance.

# Introduction

Micron Technology, Inc., is considering a project to construct, fit-out, and equip several large facilities, in Onondaga County, New York. The company would ramp up operations over two phases from 2025-2044 while investing approximately \$99.6 billion for capital expenditures (construction and machinery and equipment). In addition, there would be infrastructure (utility construction) and other investments of \$1.5 billion.

Ongoing direct employment in the facility would be 9,005 jobs as of 2045, and it would be accompanied by ongoing employment of about 5,772 in-state resident and 1,924 out-of-state visiting contractors as of 2036.

On behalf of Empire State Development (ESD), Regional Economic Models, Inc. (REMI) performed an economic and fiscal impact analysis of the facility at the state and local levels over the period 2025-2055 using a New York-specific Tax-PI model. Specifically, REMI considered how the capital expenditures, facility operations, and contractors would affect employment, economic output, Gross Domestic Product (GDP), disposable personal income, state government revenue, and local government revenue for New York and the Central New York model region in which Onondaga County is located.

REMI found strong positive economic and fiscal impacts, driven largely by the highly productive and well-compensated facility employees who create significant supply chain demand and spend robustly in the local economy. These include an average annual employment increase of 45,418 jobs, with almost 40,000 in Central New York and an associated state-level multiplier over four, an average annual increase in real economic output and real state GDP of over \$16 billion and \$9 billion respectively, an average annual increase of almost 60,000 in population, an average annual increase of more than \$5 billion in real disposable personal income, a present value (PV) of \$7.1 billion in additional real state government revenue generated given a three percent discount rate, which is greater than the present value (PV) of the proposed New York State Incentives, and a PV of \$10.7 billion in additional real local government revenue generated, of which about 85 percent accrues in Central New York.

# Methodology

In order to assess the economic and fiscal impacts of locating a semiconductor manufacturing facility in Onondaga County, New York, REMI uses ESD's currently licensed multi-region, 70-industry Tax-PI v2.5 model of New York. Onondaga County is in the Central New York model region. Tax-PI is a sophisticated dynamic regional macroeconomic, demographic, and fiscal policy model that simulates the year-by-year effects of public policy initiatives, and is widely used by state and local agencies, legislatures, universities, and other organizations and experts, both in New York and across the U.S. More detailed information is available about the model and the fiscal calibration in Appendix II.

The economic and fiscal impact of the Micron facilities on state and local economies comes from two sources. The first source is the development and construction of its facility, which is expected to last 20 years from 2025-2044. The second source of economic impact is the ongoing operations of the manufacturing facility, which includes the direct employment and compensation, ongoing R&D spending, and both in-state resident and out-of-state visiting contractors, and which is expected to commence in 2026 and ramp up until stabilizing in 2045. The capital investment and operations will both occur in two phases, with Phase 1 starting in 2025 and Phase 2 starting in 2035. The direct, indirect, and induced impacts in spending and job creation are estimated through the REMI Tax-PI model. In addition, state and local tax revenue is estimated, where totals for both New York and Central New York are reported for the latter. The analysis covers the 31-year period from 2025-2055.<sup>6</sup> Unless otherwise noted, averages are calculated over the 2025-2055 period. In Appendix I, a table of nominal values (current dollars) is available.

## *Capital Expenditures, Infrastructure, and Others*

**Phase 1.** Capital Expenditures are categorized as (1) Construction and (2) Machinery and Equipment. Infrastructure Expenditures are categorized as (3) Utility Construction (i.e., Water and sewer system upgrades, Infrastructure Grant, Site Development, and Façade Grant). Table 1.1a displays the spending for each category from 2025-2034 and in 2055, entered as demand for (i.e., a state GDP contribution from) the corresponding industry. For categories (1) and (3), the corresponding industry is Construction, and for category (2), it is Machinery Manufacturing. Additionally, there are Workforce Training expenditures of \$10 million per year during 2026-2034, which are counted as demand for the Educational Services industry.

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<sup>6</sup> Given the propensity of chip fabs to remain in operation for decades, the economic impact analysis conservatively assumes an additional 11-year operating on top of the 20-year period in which Phases 1 and 2 capital expenditures are complete. Please see section on Capital Expenditures.

**Table 1.1a: Capital Expenditures, Phase 1**

| Spending Type         | 2025 | 2026 | 2027 | 2028 | 2029 | 2030 | 2031 | 2032 | 2033 | 2034 | 2055 | Average | 2025-2034 Average |
|-----------------------|------|------|------|------|------|------|------|------|------|------|------|---------|-------------------|
| Land & Building       | 2.1  | 3.1  | 2.8  | 0.8  | 2.0  | 1.2  | 0.3  | 1.6  | 2.5  | 4.5  | -    | 0.7     | 2.1               |
| Machinery & Equipment | 0.1  | 0.8  | 1.0  | 3.6  | 3.0  | 4.6  | 5.0  | 3.4  | 3.3  | 1.9  | -    | 0.9     | 2.7               |
| Utility Construction  | 0.1  | 0.1  | 0.1  | 0.1  | 0.1  | 0.1  | 0.1  | 0.1  | 0.1  | 0.1  | -    | 0.0     | 0.1               |
| Total                 | 2.3  | 4.0  | 3.9  | 4.5  | 5.1  | 5.9  | 5.4  | 5.1  | 5.9  | 6.5  | -    | 1.6     | 4.9               |

Note: Units in Billions of Nominal Dollars. Components may not sum to totals due to rounding.

**Phase 2.** Capital Expenditures are categorized as (1) Construction and (2) Machinery and Equipment. Infrastructure Expenditures are categorized as (3) Utility Construction (i.e., Water and sewer system upgrades, Infrastructure Grant, Site Development, and Façade Grant). Table 1.1b displays the spending for each category from 2035-2044, and in 2055, entered as demand for the corresponding industry, which is the same as in Phase 1. Additionally, there are Workforce Training expenditures of \$10 million in 2035, which are counted as demand for the Educational Services industry.

**Table 1.1b: Capital Expenditures, Phase 2**

| Spending Type         | 2035 | 2036 | 2037 | 2038 | 2039 | 2040 | 2041 | 2042 | 2043 | 2044 | 2055 | Average | 2035-2044 Average |
|-----------------------|------|------|------|------|------|------|------|------|------|------|------|---------|-------------------|
| Land & Building       | 2.1  | 2.9  | 3.4  | 1.7  | -    | -    | -    | -    | -    | -    | -    | 0.3     | 1.0               |
| Machinery & Equipment | 5.0  | 4.5  | 4.2  | 4.9  | 5.7  | 5.0  | 4.6  | 2.7  | 2.7  | 2.7  | -    | 1.4     | 4.2               |
| Utility Construction  | 0.1  | 0.1  | 0.1  | 0.1  | -    | -    | -    | -    | -    | -    | -    | 0.0     | 0.0               |
| Total                 | 7.0  | 7.5  | 7.5  | 6.6  | 5.7  | 5.0  | 4.6  | 2.7  | 2.7  | 2.7  | -    | 1.7     | 5.2               |

Note: Units in Billions of Nominal Dollars. Components may not sum to totals due to rounding.

## Operations

Direct employment for Engineers, Quality Engineers, and Technicians, classified in the Semiconductor and related device manufacturing industry, would ramp up over 20 years starting in 2026, after which it would remain constant at 8,211. Table 1.2 displays this direct employment from 2026-2030 and 2036-2040, and in 2055, the final analysis year.

**Table 1.2: Direct Employment – Semiconductor and related device manufacturing**

| Variable   | 2026  | 2027  | 2028  | 2029  | 2030  | 2036  | 2037  | 2038  | 2039  | 2040  | 2055  | Average |
|------------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|---------|
| Employment | 1,570 | 2,381 | 2,979 | 3,685 | 4,223 | 6,488 | 7,021 | 7,426 | 7,558 | 7,825 | 8,211 | 6,271   |

Note: Units in Jobs. Components may not sum to totals due to rounding.

The R&D spending would ramp up to an annual value of \$301.3 million by 2045, growing by the projected inflation rate thereafter. Table 1.3 displays the spending in R&D from 2026-2030 and 2035-2039, and in 2055, the final analysis year.

**Table 1.3: Direct Employment and Spending, Professional, scientific, and technical services**

| Variable | 2026 | 2027 | 2028 | 2029 | 2030 | 2035  | 2036  | 2037  | 2038  | 2039  | 2055  | Average |
|----------|------|------|------|------|------|-------|-------|-------|-------|-------|-------|---------|
| Spending | 2.6  | 4.9  | 7.3  | 16.3 | 31.3 | 161.5 | 185.7 | 216.8 | 234.9 | 241.0 | 367.6 | 213.5   |

Note: Units for Spending in Millions of Nominal Dollars. Components may not sum to totals due to rounding.

Direct employment for Management, classified in the Management of companies and enterprises industry, would ramp up over 20 years starting in 2026, after which it would remain constant at 610. Table 1.4a displays this direct employment from 2026-2030 and 2036-2040, and in 2055, the final analysis year.

**Table 1.4: Direct Employment – Management of companies and enterprises**

| Variable   | 2026 | 2027 | 2028 | 2029 | 2030 | 2036 | 2037 | 2038 | 2039 | 2040 | 2055 | Average |
|------------|------|------|------|------|------|------|------|------|------|------|------|---------|
| Employment | 208  | 326  | 320  | 273  | 314  | 482  | 521  | 552  | 562  | 581  | 610  | 477     |

Note: Units in Jobs. Components may not sum to totals due to rounding.

Direct employment in Administrative / Other Management, classified in the Administrative and support services industry, would ramp up over 20 years starting in 2026, after which it would remain constant at 184. Table 1.5 displays this direct employment from 2026-2030 and 2036-2040, and in 2055, the final analysis year.

**Table 1.5: Direct Employment – Administrative and support services**

| Variable   | 2026 | 2027 | 2028 | 2029 | 2030 | 2036 | 2037 | 2038 | 2039 | 2040 | 2055 | Average |
|------------|------|------|------|------|------|------|------|------|------|------|------|---------|
| Employment | 94   | 125  | 122  | 82   | 95   | 146  | 156  | 166  | 169  | 174  | 184  | 146     |

Note: Units in Jobs. Components may not sum to totals due to rounding.

## Contractors

The number of contractors would remain constant at 4,000 from 2026-2035, grow to 7,697 in 2036, and remain constant afterwards. Table 1.6 displays the numbers of contractors by location and industry in 2026, 2036, and 2055, the final analysis year.

**Table 1.6: Contractor Employment**

| Industry                              | 2026  | 2036  | 2055  | Average |
|---------------------------------------|-------|-------|-------|---------|
| <i>In-State Contractors</i>           |       |       |       |         |
| Semiconductor machinery manufacturing | 2,000 | 4,079 | 4,079 | 3,277   |
| Services to buildings and dwellings   | 1,000 | 1,693 | 1,693 | 1,415   |
| <i>Out-of-State Contractors</i>       |       |       |       |         |
| Semiconductor machinery manufacturing | 1,000 | 1,924 | 1,924 | 1,564   |

Note: Units in Jobs. Components may not sum to totals due to rounding.

Aggregate out-of-state visiting contractor consumer spending during on-site would be \$97.5 million in 2026, growing by the projected inflation rate from 2026-2035. The number would rise to \$229.5 million in 2036, and would grow by the projected inflation rate thereafter. Table 1.7 displays the contractor consumer spending by category in 2026, 2036, and 2055, the final analysis year.

**Table 1.7: Out-of-State Visiting Contractor Consumer Spending**

| Commodity                     | 2026 | 2036  | 2055  | Average |
|-------------------------------|------|-------|-------|---------|
| Accommodations                | 65.0 | 153.0 | 223.3 | 143.1   |
| Purchased meals and beverages | 19.5 | 45.9  | 67.0  | 42.9    |
| Ground transportation         | 13.0 | 30.6  | 44.7  | 28.6    |

Note: Units in Millions of Nominal Dollars. Components may not sum to totals due to rounding.

# Results

This section reports the economic and fiscal impacts of the Micron facilities on New York and Central New York over the period 2025-2055, specifically on employment, economic output, GDP, personal income, disposable personal income, and state and local government revenue.

## Employment

Table 2.1 displays the employment impacts for New York and Central New York, including both the totals and breakdowns into direct, indirect, and induced impacts, from 2025-2029, from 2035-2039, and in 2055. During 2025-2055, the average total employment impact in New York is an increase of 45,418 jobs, with 39,975 occurring in Central New York. The average number of new direct jobs in the state is 11,182, implying an employment multiplier of approximately 4.1.

**Table 2.1: Employment Impacts (New York & Central New York)**

| Category                | 2025   | 2026   | 2027   | 2028   | 2029   | 2035   | 2036   | 2037   | 2038   | 2039   | 2055   | Average |
|-------------------------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|---------|
| <i>New York</i>         |        |        |        |        |        |        |        |        |        |        |        |         |
| Employment              | 15,468 | 40,272 | 40,268 | 30,724 | 38,260 | 38,829 | 58,961 | 61,989 | 55,611 | 48,511 | 50,911 | 45,418  |
| Direct                  | 8,992  | 15,229 | 14,680 | 8,217  | 13,018 | 13,033 | 17,696 | 19,297 | 14,640 | 9,763  | 9,005  | 11,182  |
| Direct Operation        | -      | 1,872  | 2,832  | 3,421  | 4,040  | 4,680  | 7,116  | 7,698  | 8,144  | 8,289  | 9,005  | 6,894   |
| Indirect                | 1,436  | 6,534  | 6,428  | 5,589  | 6,225  | 6,336  | 10,701 | 10,888 | 10,349 | 9,774  | 9,431  | 8,294   |
| Induced                 | 5,040  | 18,510 | 19,160 | 16,918 | 19,016 | 19,460 | 30,564 | 31,804 | 30,622 | 28,975 | 32,474 | 25,943  |
| <i>Central New York</i> |        |        |        |        |        |        |        |        |        |        |        |         |
| Employment              | 14,367 | 36,293 | 36,236 | 26,069 | 33,406 | 33,821 | 52,007 | 55,071 | 48,782 | 41,798 | 44,943 | 39,975  |
| Direct                  | 8,964  | 15,085 | 14,505 | 7,650  | 12,557 | 12,455 | 17,187 | 18,849 | 14,132 | 9,196  | 9,005  | 10,922  |
| Direct Operation        | -      | 1,872  | 2,832  | 3,421  | 4,040  | 4,680  | 7,116  | 7,698  | 8,144  | 8,289  | 9,005  | 6,894   |
| Indirect                | 1,281  | 6,251  | 6,152  | 5,380  | 5,951  | 6,037  | 10,327 | 10,496 | 10,017 | 9,507  | 9,231  | 8,047   |
| Induced                 | 4,121  | 14,957 | 15,579 | 13,040 | 14,898 | 15,329 | 24,493 | 25,727 | 24,633 | 23,095 | 26,707 | 21,006  |

Note: Units in Jobs. Components may not sum to totals due to rounding.

## Economic Output & Gross Domestic Product

Table 2.2 displays the real economic output and real GDP impacts for New York and Central New York from 2025-2039, from 2035-2039, and in 2055. During 2025-2055, the average economic output and GDP impacts in New York are increases of \$16.7 billion and \$9.6 billion respectively. For Central New York, the corresponding impacts are \$14.9 billion and \$8.6 billion. Central New York accounts for about 90 percent of the economic output impact and 90 percent of the GDP impact. This is driven by the aforementioned high productivity of the semiconductor manufacturing facility employees, generating a sizable economic footprint in the state relative to their employment presence.

**Table 2.2: Economic Output & Gross Domestic Product Impacts (New York & Central New York)**

| Variable                | 2025 | 2026 | 2027 | 2028 | 2029 | 2035 | 2036 | 2037 | 2038 | 2039 | 2055 | Average |
|-------------------------|------|------|------|------|------|------|------|------|------|------|------|---------|
| <i>New York</i>         |      |      |      |      |      |      |      |      |      |      |      |         |
| Output                  | 2.8  | 10.2 | 10.5 | 9.4  | 11.0 | 12.0 | 19.4 | 20.3 | 19.4 | 18.4 | 22.8 | 16.7    |
| GDP                     | 1.6  | 5.6  | 5.9  | 5.2  | 6.2  | 6.9  | 11.0 | 11.6 | 11.2 | 10.5 | 13.2 | 9.6     |
| <i>Central New York</i> |      |      |      |      |      |      |      |      |      |      |      |         |
| Output                  | 2.6  | 9.1  | 9.5  | 8.1  | 9.6  | 10.4 | 17.3 | 18.2 | 17.3 | 16.2 | 20.7 | 14.9    |
| GDP                     | 1.5  | 5.0  | 5.3  | 4.5  | 5.4  | 6.1  | 9.9  | 10.5 | 10.0 | 9.4  | 11.9 | 8.6     |

Note: Units in Billions of 2025 Dollars. Components may not sum to totals due to rounding.

## Population

Table 2.3 displays the population impacts for New York and Central New York from 2025-2029, from 2035-2039, and in 2055. During 2025-2055, the average population impact in New York is 59,575, with 53,388 accruing in Central New York. This is primarily driven by the economic migrants<sup>7</sup> flowing into the region, largely due to the expanded availability of high compensation jobs.

**Table 2.3: Population Impacts (New York & Central New York)**

| Variable                | 2025  | 2026   | 2027   | 2028   | 2029   | 2035   | 2036   | 2037   | 2038   | 2039   | 2055   | Average |
|-------------------------|-------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|---------|
| <i>New York</i>         |       |        |        |        |        |        |        |        |        |        |        |         |
| Population              | 4,285 | 14,112 | 21,178 | 24,212 | 29,216 | 48,429 | 56,050 | 62,791 | 66,605 | 68,072 | 84,530 | 59,575  |
| <i>Central New York</i> |       |        |        |        |        |        |        |        |        |        |        |         |
| Population              | 4,056 | 12,992 | 19,368 | 21,607 | 26,038 | 43,203 | 50,094 | 56,278 | 59,595 | 60,642 | 76,264 | 53,388  |

Note: Units in Individuals. Components may not sum to totals due to rounding.

<sup>7</sup> Economic migration is net population movement into (or out of) a region driven by a change in economic conditions such as job availability, compensation, cost of living, or taxes.

## Personal Income & Disposable Personal Income

Table 2.4 displays the real personal income and real disposable personal income impacts for New York and Central New York from 2025-2029, from 2035-2039, and in 2055. During 2025-2055, the average personal income impact in New York is \$6.8 billion, with \$5.8 billion accruing in Central New York; the average disposable personal income impact in New York is \$5.4 billion, with \$4.7 billion accruing in Central New York. This is primarily driven by the high compensation of the direct employees, as well as the additional labor income earned in the many spillover jobs generated in other industries.

**Table 2.4: Personal Income & Disposable Personal Income Impacts (New York & Central New York)**

| Variable                   | 2025 | 2026 | 2027 | 2028 | 2029 | 2035 | 2036 | 2037 | 2038 | 2039 | 2055 | Average |
|----------------------------|------|------|------|------|------|------|------|------|------|------|------|---------|
| <i>New York</i>            |      |      |      |      |      |      |      |      |      |      |      |         |
| Personal Income            | 1.1  | 3.5  | 3.8  | 3.3  | 3.9  | 4.9  | 7.1  | 7.7  | 7.4  | 7.1  | 10.3 | 6.8     |
| Disposable Personal Income | 0.9  | 2.7  | 2.9  | 2.6  | 3.1  | 3.9  | 5.6  | 6.1  | 5.9  | 5.7  | 8.3  | 5.4     |
| <i>Central New York</i>    |      |      |      |      |      |      |      |      |      |      |      |         |
| Personal Income            | 1.0  | 3.0  | 3.2  | 2.7  | 3.3  | 4.1  | 6.1  | 6.6  | 6.3  | 6.0  | 8.9  | 5.8     |
| Disposable Personal Income | 0.8  | 2.3  | 2.5  | 2.1  | 2.6  | 3.3  | 4.8  | 5.2  | 5.1  | 4.8  | 7.3  | 4.7     |

Note: Units in Billions of 2025 Dollars. Components may not sum to totals due to rounding.

## State Government Revenue<sup>8</sup>

Table 2.5a displays the real state government revenue impacts for New York during 2025-2029 and 2035-2039, and in 2055. During 2025-2055, real state government revenue increases by \$378.5 million on average. Approximately 66 percent of the real revenue is from the personal income tax.

**Table 2.5a: State Government Revenue**

| Variable                 | 2025 | 2026  | 2027  | 2028  | 2029  | 2035  | 2036  | 2037  | 2038  | 2039  | 2055  | Average |
|--------------------------|------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|---------|
| Total Revenue            | 17.4 | 110.9 | 230.3 | 237.6 | 219.3 | 329.3 | 329.4 | 443.0 | 463.3 | 443.5 | 544.7 | 378.5   |
| Personal Income          | 12.7 | 76.9  | 158.3 | 160.4 | 149.5 | 218.6 | 220.9 | 298.9 | 310.3 | 294.3 | 359.1 | 251.5   |
| Corporation and Business | 1.8  | 10.9  | 22.4  | 22.7  | 21.1  | 30.9  | 31.3  | 42.3  | 43.9  | 41.6  | 50.8  | 35.6    |
| Sales, Excise and User   | 2.2  | 19.1  | 41.3  | 46.1  | 40.8  | 68.2  | 65.5  | 86.0  | 92.7  | 92.1  | 115.8 | 78.2    |
| Property Transfers       | 0.6  | 3.8   | 7.8   | 7.9   | 7.4   | 10.8  | 10.9  | 14.7  | 15.3  | 14.5  | 17.7  | 12.4    |
| Other Taxes and Fees     | 0.0  | 0.3   | 0.6   | 0.6   | 0.5   | 0.8   | 0.8   | 1.0   | 1.1   | 1.0   | 1.2   | 0.9     |

Note: Units in Millions of 2025 Dollars. Components may not sum to totals due to rounding.

<sup>8</sup> Both New York State and Onondaga County have a sales tax rate of 4.0%. Sales of equipment for manufacturing businesses are exempt from sales tax. The sales tax on purchases of construction materials and other supplies is also waived.

Table 2.5b displays the current dollar state government revenue impacts for New York during 2025-2029 and 2035-2039, and in 2055. During 2025-2055, current dollar state government revenue increases by \$17.2 billion.

**Table 2.5b: State Government Revenue (Current Dollars)**

| Variable                 | 2025 | 2026  | 2027  | 2028  | 2029  | 2035  | 2036  | 2037  | 2038  | 2039  | 2055    | Average | Total    |
|--------------------------|------|-------|-------|-------|-------|-------|-------|-------|-------|-------|---------|---------|----------|
| Total Revenue            | 17.6 | 114.5 | 242.9 | 255.9 | 241.1 | 408.3 | 416.6 | 571.5 | 609.7 | 595.2 | 1,002.6 | 555.5   | 17,221.5 |
| Personal Income          | 12.9 | 79.4  | 166.9 | 172.7 | 164.3 | 271.1 | 279.4 | 385.7 | 408.3 | 394.9 | 661.1   | 368.6   | 11,425.3 |
| Corporation and Business | 1.8  | 11.2  | 23.6  | 24.4  | 23.2  | 38.4  | 39.5  | 54.6  | 57.8  | 55.9  | 93.5    | 52.1    | 1,616.5  |
| Sales, Excise and User   | 2.2  | 19.7  | 43.5  | 49.6  | 44.9  | 84.6  | 82.9  | 110.9 | 122.0 | 123.6 | 213.1   | 115.4   | 3,576.9  |
| Property Transfers       | 0.6  | 3.9   | 8.2   | 8.5   | 8.1   | 13.4  | 13.8  | 19.0  | 20.1  | 19.5  | 32.6    | 18.2    | 563.0    |
| Other Taxes and Fees     | 0.0  | 0.3   | 0.6   | 0.6   | 0.6   | 0.9   | 1.0   | 1.3   | 1.4   | 1.4   | 2.3     | 1.3     | 39.7     |

Note: Units in Millions of Current Dollars. Components may not sum to totals due to rounding.

### Local Government Revenue<sup>9</sup>

Table 2.6a displays the real local government revenue impacts for *All of New York* and Central New York during 2025-2029 and 2035-2039, and in 2055. During 2025-2055, local government revenue for *All of New York* increases by \$565.5 million on average. For Central New York, the corresponding impact is \$490.4 million. Approximately, 85 percent of the real local government revenue is generated from Central New York. It is important to note that the local government revenue impact reported for Central New York is the region’s contribution to the *All of New York* local government revenue based on Central New York local government tax rates.

**Table 2.6a: Local Government Revenue - All of New York & Central New York**

| Variable                                         | 2025 | 2026  | 2027  | 2028  | 2029  | 2035  | 2036  | 2037  | 2038  | 2039  | 2055  | Average |
|--------------------------------------------------|------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|---------|
| <i>All New York Local Government Revenue</i>     |      |       |       |       |       |       |       |       |       |       |       |         |
| Total Revenue                                    | 96.4 | 322.9 | 348.7 | 303.9 | 359.1 | 416.7 | 629.3 | 672.5 | 647.2 | 608.6 | 800.2 | 565.5   |
| <i>Central New York Local Government Revenue</i> |      |       |       |       |       |       |       |       |       |       |       |         |
| Total Revenue                                    | 84.9 | 280.1 | 302.2 | 251.7 | 303.4 | 354.7 | 542.8 | 583.0 | 557.7 | 520.1 | 700.1 | 490.4   |

Note: Units in Millions of 2025 Dollars. Components may not sum to totals due to rounding.

<sup>9</sup> For the Micron facilities, instead of collecting real estate tax, Onondaga County will utilize a Payment in Lieu of Taxes (PILOT) agreement. From 2025 to 2055, the total PILOT payment will be \$43.7 million, or the total PILOT savings will be \$146.8 million. New York State and Onondaga County have a sales tax rate of 4.0 percent. Sales of equipment for manufacturing businesses are exempt from sales tax. The sales tax on purchases of construction materials and other supplies is also waived.

Table 2.6b displays the current dollar local government revenue impacts for *All of New York* and Central New York during 2025-2029 and 2035-2039, and in 2055. During 2025-2055, local government revenue for *All of New York* increases by \$826.1 million on average (\$25.6 billion in total). For Central New York, the corresponding impact is \$694.5 million on average (\$21.5 billion in total). Approximately, 85 percent of the current dollar local government revenue is generated from Central New York. It is important to note that the local government revenue impact reported for Central New York is the region’s contribution to the *All of New York* local government revenue based on Central New York local government tax rates. Approximately 57 percent of the Central New York local government revenue is generated in Onondaga County.

**Table 2.6b: Local Government Revenue (Current Dollars) - All of New York & Central New York**

| Variable                                         | 2025 | 2026  | 2027  | 2028  | 2029  | 2035  | 2036  | 2037  | 2038  | 2039  | 2055    | Average | Total    |
|--------------------------------------------------|------|-------|-------|-------|-------|-------|-------|-------|-------|-------|---------|---------|----------|
| <i>All New York Local Government Revenue</i>     |      |       |       |       |       |       |       |       |       |       |         |         |          |
| Total Revenue                                    | 97.5 | 333.5 | 367.7 | 327.2 | 394.8 | 516.6 | 795.9 | 867.6 | 851.6 | 816.8 | 1,472.9 | 826.1   | 25,608.9 |
| <i>Central New York Local Government Revenue</i> |      |       |       |       |       |       |       |       |       |       |         |         |          |
| Total Revenue                                    | 83.2 | 280.2 | 308.5 | 262.3 | 322.6 | 425.1 | 663.6 | 727.1 | 709.5 | 675.0 | 1,248.9 | 694.5   | 21,529.1 |

Note: Units in Millions of Current Dollars. Components may not sum to totals due to rounding.

**Incentives Offer Analysis: Current Dollar \$5.8 Billion, 3 Percent Discount Rate**

Table 2.7 displays the real GDP, real disposable personal income, real state government revenue, and real local government revenue impacts, the real Economic Benefit, and the real New York State Incentives during 2025-2029 and 2035-2039, and in 2055. The table also displays the PV of each under a three percent discount rate. The Economic Benefit measure is defined by ESD as being the sum of the real disposable personal income, real state government revenue, and real local government revenue impacts.

During 2025-2055, the PV of the real GDP, real disposable personal income, real state government revenue, and real local government revenue impacts are \$182.5, \$101.4 billion, \$7.1 billion, and \$10.7 billion respectively, yielding a real Economic Benefit PV of \$119.2 billion. The PV of the real New York State Incentives for 2025-2055 is \$3.5 billion.

The fiscal benefit-cost ratio, which is calculated as the ratio of the PV of the real state government revenue impact to the PV of the real New York State Incentives, comes out to 2.0. The Economic Benefit ratio, which is calculated as the ratio of the PV of the real Economic Benefit to the PV of the real New York State Incentives, comes out to 33.6. The ROI real GDP ratio, which is calculated as the ratio of the PV of the real GDP impact to the PV of the real New York State incentives, comes out to 51.5.

**Table 2.7: Disposable Personal Income, State Government Revenue, Local Government Revenue, Economic Benefit, New York State Incentives, Combined Phases, 3 Percent Discount Rate**

| Variable                              | 2025  | 2026    | 2027    | 2028    | 2029    | 2035    | 2036    | 2037    | 2038    | 2039    | 2055    | Average | PV (3%)        |
|---------------------------------------|-------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|----------------|
| <i>NYS Gross Domestic Product</i>     |       |         |         |         |         |         |         |         |         |         |         |         |                |
| Total                                 | 1,616 | 5,579   | 5,854   | 5,178   | 6,184   | 6,890   | 11,042  | 11,645  | 11,184  | 10,548  | 13,183  | 9,601.2 | 182,495.9      |
| <i>NYS Disposable Personal Income</i> |       |         |         |         |         |         |         |         |         |         |         |         |                |
| Total                                 | 878.6 | 2,700.8 | 2,903.6 | 2,560.8 | 3,076.5 | 3,891.9 | 5,630.9 | 6,069.0 | 5,919.1 | 5,660.7 | 8,329.6 | 5,428.9 | 101,392.7      |
| <i>NYS Government Revenue</i>         |       |         |         |         |         |         |         |         |         |         |         |         |                |
| Total                                 | 17.4  | 110.9   | 230.3   | 237.6   | 219.3   | 329.3   | 329.4   | 443.0   | 463.3   | 443.5   | 544.7   | 378.5   | 7,114.4        |
| <i>Local Government Revenue</i>       |       |         |         |         |         |         |         |         |         |         |         |         |                |
| Total                                 | 96.4  | 322.9   | 348.7   | 303.9   | 359.1   | 647.2   | 608.6   | 618.1   | 625.8   | 626.3   | 800.2   | 565.5   | 10,727.5       |
| <i>Economic Benefits</i>              |       |         |         |         |         |         |         |         |         |         |         |         |                |
| Total                                 | 992.3 | 3,134.5 | 3,482.6 | 3,102.3 | 3,655.0 | 4,868.4 | 6,568.8 | 7,130.0 | 7,008.3 | 6,730.5 | 9,674.4 | 6,373.0 | 119,234.6      |
| <i>New York State Incentives</i>      |       |         |         |         |         |         |         |         |         |         |         |         |                |
| Total                                 | -     | 147.5   | 231.0   | 225.3   | 250.4   | 321.7   | 272.6   | 286.7   | 287.6   | 252.1   | -       | 150.9   | 3,544.3        |
|                                       |       |         |         |         |         |         |         |         |         |         |         |         | <b>PV (3%)</b> |
| <b>Fiscal Benefit-Cost Ratio</b>      |       |         |         |         |         |         |         |         |         |         |         |         | 2.0            |
| <b>Economic Benefit Ratio</b>         |       |         |         |         |         |         |         |         |         |         |         |         | 33.6           |
| <b>ROI Real GDP Ratio</b>             |       |         |         |         |         |         |         |         |         |         |         |         | 51.5           |

Note: Units in Millions of 2025 Dollars. Components may not sum to totals due to rounding.

# Conclusion

REMI conducted an analysis of the Micron facilities on behalf of ESD to evaluate how the semiconductor manufacturing facilities would impact the New York and Central New York economies. The findings show that from 2025-2055, the average total employment impact in a given year is an increase of 45,418 jobs, with close to 90 percent occurring in Central New York. The average impact on the size of the state economy is \$16.7 billion in real economic output and \$9.6 billion in real GDP, the average impact on state population is 59,575, and the average impact on state real disposable personal income is \$5.4 billion. Importantly, the facility also generates \$378.5 million in additional real state government revenue on average, 2.5 times the value of the proposed real New York State Incentives on average (\$150.9 million), and more than \$565.5 million in additional real local government revenue statewide on average during the analysis period. Ultimately, these results point to substantial positive impacts on New York's economy and budget, supported by productive and high-paying jobs and a fostering of further growth in the semiconductor manufacturing ecosystem in the state.

# Appendix I: Supplemental Tables

## *Incentives Offer Analysis: Current Dollar \$5.8 Billion, 6 Percent Discount Rate*

Table 3.1 displays the real GDP, real disposable personal income, real state government revenue, and real local government revenue impacts, the real Economic Benefit, and the real New York State Incentives during 2025-2029 and 2035-2039, and in 2055. The table also displays the PV of each under a six percent discount rate. The Economic Benefit measure is defined by ESD as being the sum of the real disposable personal income, real state government revenue, and real local government revenue impacts.

During 2025-2055, the PV of the real GDP, real disposable personal income, real state government revenue, and real local government revenue impacts are \$120.3, \$65.7 billion, \$4.6 billion, and \$7.1 billion respectively, yielding a real Economic Benefit PV of \$77.4 billion. The PV of the real New York State Incentives for 2025-2055 is \$2.8 billion.

The fiscal benefit-cost ratio, which is calculated as the ratio of the PV of the real state government revenue impact to the PV of the real New York State Incentives, comes out to 1.7. The Economic Benefit ratio, which is calculated as the ratio of the PV of the real Economic Benefit to the PV of the real New York State Incentives, comes out to 28.0. The ROI real GDP ratio, which is calculated as the ratio of the PV of the real GDP impact to the PV of the real New York State incentives, comes out to 43.5.

**Table 3.1: Disposable Personal Income, State Government Revenue, Local Government Revenue, Economic Benefit, New York State Incentives, Combined Phases, 6 Percent Discount Rate**

| Variable                              | 2025  | 2026    | 2027    | 2028    | 2029    | 2035    | 2036    | 2037    | 2038    | 2039    | 2055    | Average | PV (6%)        |
|---------------------------------------|-------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|----------------|
| <i>NYS Gross Domestic Product</i>     |       |         |         |         |         |         |         |         |         |         |         |         |                |
| Total                                 | 1,616 | 5,579   | 5,854   | 5,178   | 6,184   | 6,890   | 11,042  | 11,645  | 11,184  | 10,548  | 13,183  | 9,601.2 | 120,311.6      |
| <i>NYS Disposable Personal Income</i> |       |         |         |         |         |         |         |         |         |         |         |         |                |
| Total                                 | 878.6 | 2,700.8 | 2,903.6 | 2,560.8 | 3,076.5 | 3,891.9 | 5,630.9 | 6,069.0 | 5,919.1 | 5,660.7 | 8,329.6 | 5,428.9 | 65,722.1       |
| <i>NYS Government Revenue</i>         |       |         |         |         |         |         |         |         |         |         |         |         |                |
| Total                                 | 17.4  | 110.9   | 230.3   | 237.6   | 219.3   | 329.3   | 329.4   | 443.0   | 463.3   | 443.5   | 544.7   | 378.5   | 4,689.9        |
| <i>Local Government Revenue</i>       |       |         |         |         |         |         |         |         |         |         |         |         |                |
| Total                                 | 96.4  | 322.9   | 348.7   | 303.9   | 359.1   | 647.2   | 608.6   | 618.1   | 625.8   | 626.3   | 800.2   | 565.5   | 7,061.9        |
| <i>Economic Benefits</i>              |       |         |         |         |         |         |         |         |         |         |         |         |                |
| Total                                 | 992.3 | 3,134.5 | 3,482.6 | 3,102.3 | 3,655.0 | 4,868.4 | 6,568.8 | 7,130.0 | 7,008.3 | 6,730.5 | 9,674.4 | 6,373.0 | 77,473.9       |
| <i>New York State Incentives</i>      |       |         |         |         |         |         |         |         |         |         |         |         |                |
| Total                                 | 119.3 | 120.8   | 138.8   | 175.8   | 111.4   | 165.2   | 169.9   | 58.7    | 58.5    | 57.6    | -       | 75.6    | 2,764.1        |
|                                       |       |         |         |         |         |         |         |         |         |         |         |         | <b>PV (6%)</b> |
| <b>Fiscal Benefit-Cost Ratio</b>      |       |         |         |         |         |         |         |         |         |         |         |         | 1.7            |
| <b>Economic Benefit Ratio</b>         |       |         |         |         |         |         |         |         |         |         |         |         | 28.0           |
| <b>ROI Real GDP Ratio</b>             |       |         |         |         |         |         |         |         |         |         |         |         | 43.5           |

Note: Units in Millions of 2025 Dollars. Components may not sum to totals due to rounding.

### Current Dollar Tables

**Table 3.2a: Gross Domestic Product, Economic Output, Disposable Personal Income, State Government Revenue, Local Government Revenue, Economic Benefit, New York State Incentives, Capital Expenditures**

| Variable                   | Average  | Total     |
|----------------------------|----------|-----------|
| Gross Domestic Product     | 13,941.9 | 430,607.1 |
| Output                     | 24,348.5 | 751,975.9 |
| Disposable Personal Income | 7,774.8  | 240,156.0 |
| State Revenue              | 555.5    | 17,221.5  |
| Local Government Revenue   | 826.1    | 25,608.9  |
| NYS Incentives             | 187.1    | 5,800.0   |
| Capital Expenditures       | 3,213.0  | 99,603.0  |

Note: Units in Millions of Current Dollars. Components may not sum to totals due to rounding.

**Table 3.2b: Central New York (CNY) Gross Domestic Product, Economic Output, Disposable Personal Income, Local Government Revenue, Economic Benefit**

| Variable                       | Average  | Total     |
|--------------------------------|----------|-----------|
| CNY Gross Domestic Product     | 12,610.4 | 390,923.4 |
| CNY Output                     | 21,867.0 | 677,875.9 |
| CNY Disposable Personal Income | 6,694.2  | 207,520.8 |
| CNY Local Government Revenue   | 694.5    | 21,529.1  |

Note: Units in Millions of Current Dollars. Components may not sum to totals due to rounding.

# Appendix II: REMI Model Framework & Fiscal Calibration

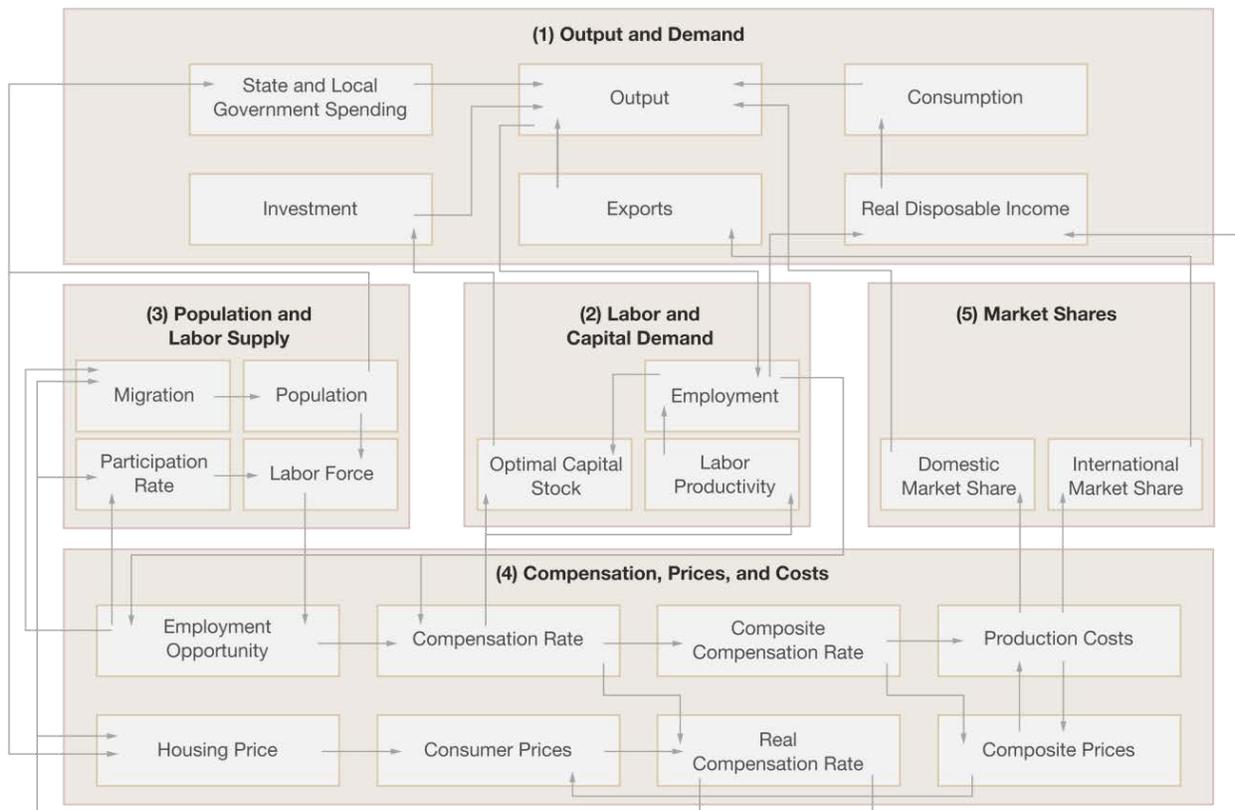
## REMI Model Framework

Tax-PI is a structural economic, demographic, and fiscal forecasting and policy analysis model. The following core framework applies to all REMI model builds. The model integrates input-output, computable general equilibrium, econometric and economic geography methodologies. The model is dynamic, with forecasts and simulations generated on an annual basis and behavioral responses to compensation, price, and other economic factors.

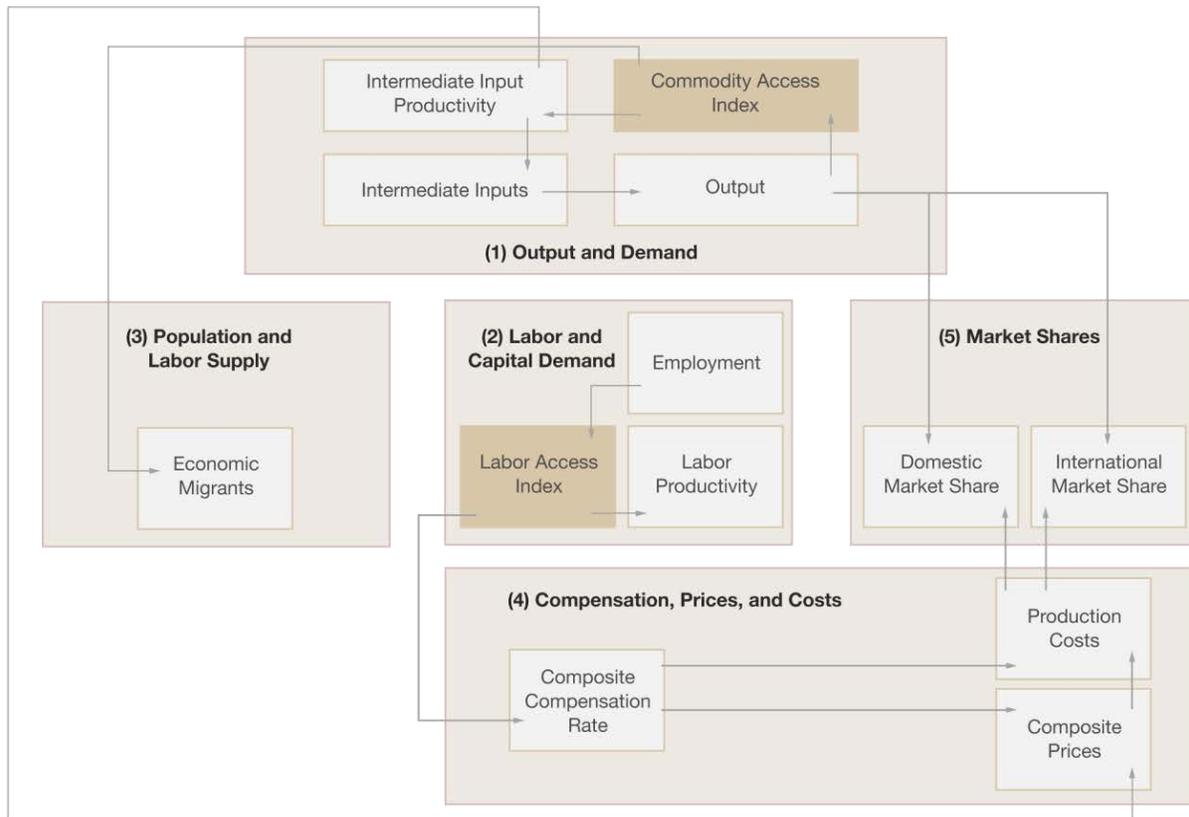
The model consists of thousands of simultaneous equations with a structure that is relatively straightforward. The exact number of equations used varies depending on the extent of industry, demographic, demand, and other detail in the specific model being used. The overall structure of the model can be summarized in five major blocks: (1) Output and Demand, (2) Labor and Capital Demand, (3) Population and Labor Supply, (4) Compensation, Prices, and Costs, and (5) Market Shares. The blocks and their key interactions are shown in Figures 1 and 2.

**Figure A1.1: REMI Model Linkages**

REMI Model Linkages (Excluding Economic Geography Linkages)



**Figure A1.2: Economic Geography Linkages**



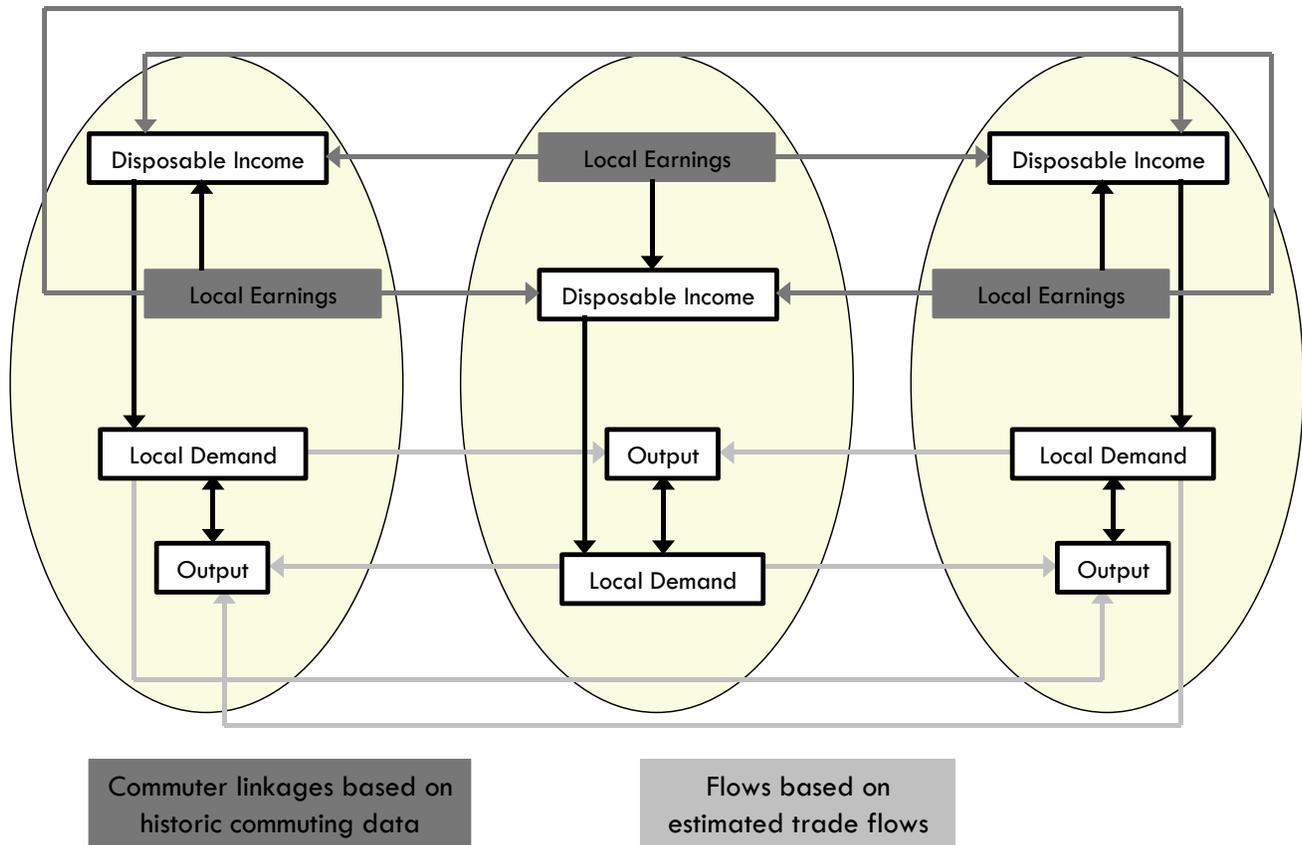
The Output and Demand block consists of output, demand, consumption, investment, government spending, exports, and imports, as well as feedback from output change due to the change in the productivity of intermediate inputs. The Labor and Capital Demand block includes labor intensity and productivity as well as demand for labor and capital. Labor force participation rate and migration equations are in the Population and Labor Supply block. The Compensation, Prices, and Costs block includes composite prices, determinants of production costs, the consumption price deflator, housing prices, and the compensation equations. The proportion of local, inter-regional, and export markets captured by each region is included in the Market Shares block.

Models can be built as single region, multi-region, or multi-region national models. A region is defined broadly as a sub-national area, and could consist of a state, province, county, or city, or any combination of sub-national areas.

Single-region models consist of an individual region, called the home region. The rest of the nation is also represented in the model. However, since the home region is only a small part of the total nation, the changes in the region do not have an endogenous effect on the variables in the rest of the nation. Multi-regional models have interactions among regions, such as trade and commuting flows. These interactions include trade flows from each region to each of the other regions. These flows are illustrated for a three-region model in Figure 3.

Figure A1.3: Trade and Commuter Flow Linkages

## Trade and Commuter Flow Linkages



Multiregional national models also include a central bank monetary response that constrains labor markets. Models that only encompass a relatively small portion of a nation are not endogenously constrained by changes in exchange rates or monetary responses.

### Block 1. Output and Demand

This block includes output, demand, consumption, investment, government spending, import, commodity access, and export concepts. Output for each industry in the home region is determined by industry demand in all regions in the nation, the home region's share of each market, and international exports from the region.

For each industry, demand is determined by the amount of output, consumption, investment, and capital demand on that industry. Consumption depends on real disposable income per capita, relative prices, differential income elasticities, and population. Input productivity depends on access to inputs because a larger choice set of inputs means it is more likely that the input with the specific characteristics required for the job will be found. In the capital stock adjustment process, investment occurs to fill the difference between optimal and actual capital stock for residential, non-residential, and equipment investment. Government spending changes are determined by changes in the population.

### *Block 2. Labor and Capital Demand*

The Labor and Capital Demand block includes the determination of labor productivity, labor intensity, and the optimal capital stocks. Industry-specific labor productivity depends on the availability of workers with differentiated skills for the occupations used in each industry. The occupational labor supply and commuting costs determine firms' access to a specialized labor force.

Labor intensity is determined by the cost of labor relative to the other factor inputs, capital and fuel. Demand for capital is driven by the optimal capital stock equation for both non-residential capital and equipment. Optimal capital stock for each industry depends on the relative cost of labor and capital, and the employment weighted by capital use for each industry. Employment in private industries is determined by the value added and employment per unit of value added in each industry.

### *Block 3. Population and Labor Supply*

The Population and Labor Supply block includes detailed demographic information about the region. Population data is given for age, gender, and race, with birth and survival rates for each group. The size and labor force participation rate of each group determines the labor supply. These participation rates respond to changes in employment relative to the potential labor force and to changes in the real after-tax compensation rate. Migration includes retirement, military, international, and economic migration. Economic migration is determined by the relative real after-tax compensation rate, relative employment opportunity, and consumer access to variety.

### *Block 4. Compensation, Prices and Costs*

This block includes delivered prices, production costs, equipment cost, the consumption deflator, consumer prices, the price of housing, and the compensation equation. Economic geography concepts account for the productivity and price effects of access to specialized labor, goods, and services.

These prices measure the price of the industry output, taking into account the access to production locations. This access is important due to the specialization of production that takes place within each industry, and because transportation and transaction costs of distance are significant. Composite prices for each industry are then calculated based on the production costs of supplying regions, the effective distance to these regions, and the index of access to the variety of outputs in the industry relative to the access by other uses of the product.

The cost of production for each industry is determined by the cost of labor, capital, fuel, and intermediate inputs. Labor costs reflect a productivity adjustment to account for access to specialized labor, as well as underlying compensation rates. Capital costs include costs of non-residential structures and equipment, while fuel costs incorporate electricity, natural gas, and residual fuels.

The consumption deflator converts industry prices to prices for consumption commodities. For potential migrants, the consumer price is additionally calculated to include housing prices. Housing prices change from their initial level depending on changes in income and population density.

Compensation changes are due to changes in labor demand and supply conditions and changes in the national compensation rate. Changes in employment opportunities relative to the labor force and occupational demand change determine compensation rates by industry.

### *Block 5. Market Shares*

The market shares equations measure the proportion of local and export markets that are captured by each industry. These depend on relative production costs, the estimated price elasticity of demand, and the effective distance between the home region and each of the other regions. The change in share of a specific area in any region depends on changes in its delivered price and the quantity it produces compared with the same factors for competitors in that market. The share of local and external markets then drives the exports from and imports to the home economy.

### *Fiscal Calibration*

Each Tax-PI budget category is assigned an “Economic Indicator” that allows it to respond to changes in a specific economic variable (e.g., Personal Income for Personal Income Tax Revenue). Because the Tax-PI model integrates the economic outlook into fiscal projections, this analysis captures the interaction between economic activity and the level of tax revenue.

**APPENDIX D**  
**LAND USE, ZONING, AND PUBLIC POLICY**

**Appendix D-1**  
**Land Use, Zoning, and Public Policy Methodology**

## **D-1 Land Use, Zoning, and Public Policy Methodology**

This section defines the study area for land use, zoning, and public policy and explains the methodology, data, and sources of information used to describe the affected environment. This section also explains the evaluation methods used to determine the direct and indirect effects of the alternatives on land use, zoning, and public policy. The analysis considers the Preferred Action Alternative's direct effects on uses and development trends within the study area and its compatibility with the surrounding built and natural environment. The analysis also considers the Preferred Action Alternative's relationship to applicable zoning regulations and public policies. Finally, the analysis considers potential indirect growth inducing effects on land use, zoning, and public policy in the region. Potential cumulative effects on land use, zoning, and public policy are evaluated in Chapter 4.

The land use study area encompasses the full scope of the Proposed Project and the proposed Connected Actions. The study area for the Proposed Project includes the Micron Campus, the Rail Spur Site, and the Childcare Site, as well as the area within a 1-mile radius surrounding the Micron Campus and the Rail Spur Site and a ¼-mile radius surrounding the Childcare Site, as shown in Figure 3.1-1. These study area limits represent a conservative estimate of the broader area potentially susceptible to land use changes from the Proposed Project. The build-out of the Micron Campus and the Rail Spur Site would create industrial uses in an area generally surrounded by vacant land, residential uses, and agricultural land. Therefore, the 1-mile radius around the Micron Campus and the Rail Spur Site represents the area that would be most likely to experience potential adverse effects from the manufacturing and industrial activities on those sites, such as noise and vibration effects from construction activities and the effects of increased traffic. The Childcare Site would include childcare, medical, and recreational uses more common in residential and commercial areas with more limited potential to disturb adjacent properties. Therefore, the ¼-mile radius was selected based on the lower likelihood of potential adverse effects from that site to extend beyond that distance.

The land use study area also encompasses the Connected Actions (electricity, natural gas, telecommunications, water, wastewater, and utility improvements; see Table 3.1-3). The Connected Actions would include upgrades to existing utility properties and certain linear infrastructure located primarily in existing rights-of-way and easements that would be unlikely to generate noticeable post-construction effects beyond the utility boundaries. Therefore, the study area for the Connected Actions is limited to the extent of the new utilities and improvements upon build-out but considers any potential effects on surrounding properties, including privately owned parcels along utility easement areas. The analysis also considers relevant effects on surrounding land uses and relevant zoning and public policy considerations.

Various sources were used to comprehensively analyze the land use, zoning, and public policy characteristics of the study area, including land use data supplied by Onondaga County; zoning maps from both the Town of Clay and the Town of Cicero as well as those towns' respective zoning codes; and comprehensive plans and other planning documents published by Onondaga County, the Town of Clay, and Town of Cicero. The methodology accounts for all existing land uses in the study area, including existing residences, businesses, and community facilities in the vicinity of the Proposed Project, as well as the other planned projects identified in Table 3.1-2.

The analysis also summarizes the existing zoning regulations applicable to the area of the Preferred Action Alternative and the land use study area and describes any changes to zoning regulations that are anticipated by the Preferred Action Alternative.

As explained in Section 3.1.3.2, the analysis of growth inducing effects due to reasonably foreseeable increases in population, jobs and economic activity, and residential, commercial, and industrial development under the Preferred Action Alternative relies on a study area that includes the five-county region. Because this study area supports the analysis of the alternatives' potential growth inducing effects on multiple resource areas, the detailed methodology for this study area is provided in Appendix B-3.

Finally, the methodology also considers the Preferred Action Alternative's relationship to applicable local or regional planning and economic development policies, including the Onondaga County Comprehensive Plan, the SMTC 2050 Long Range Transportation Plan 2020 Update, the Town of Clay Northern Land Use Study, the Town of Cicero Comprehensive Plan, and the New York Green CHIPS Program.

## **Appendix D-2 Zoning Regulations**

## D-2 Zoning Regulations

This section summarizes the zoning regulations that would be applicable to the Proposed Project, including design standards, site plan conditions, and mitigation requirements potentially applicable to new development.

### D-2.1 Industrial-2 District (Town of Clay)

The majority of the Micron Campus and the entire Rail Spur Site would be located within the Town of Clay Industrial-2 (I-2) zoning district.

As shown in Table D-1 below, development in the I-2 district must comply with the dimensional/bulk (i.e., building size and shape), density, and design requirements in the Town of Clay Zoning Code. The I-2 district does not have minimum lot area, width, or depth requirements, and does not restrict maximum building height, number of floors, or gross floor area, but does include a maximum building coverage of 60 percent and a total maximum lot coverage of 80 percent. The district also requires minimum frontage and perimeter landscape areas and additional side and rear yards when a lot abuts a non-industrial district. In addition, the district imposes performance standards on activities that emit noise exceeding certain maximum levels, vibration, dust and dirt, smoke, noxious gases, and odors, as well as standards relating to lighting and glare, radioactive materials, fire, and safety hazards.

**Table D-1 Town of Clay I-2 District Requirements**

| Requirement                                              | Principal Structure                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Accessory Structure |
|----------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|
| <b>Minimum Required Dimensions/Bulk</b>                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                     |
| Lot Area / Width / Depth                                 | -                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | -                   |
| <b>Maximum Permitted Dimensions/Bulk</b>                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                     |
| Building Height / Floors                                 | -                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | -                   |
| Gross Floor Area (GFA)                                   | -                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | -                   |
| Building Coverage                                        | 60%                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 60%                 |
| Total Lot Coverage                                       | 80%                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 80%                 |
| Front Perimeter Landscape Strip                          | 50% of front yard area required (25% of front yard required when a lot is surrounded on all sides by other industrial zones).                                                                                                                                                                                                                                                                                                                                                                                                     |                     |
| Structure Design, Scale, and Materials                   | Approval required for new or modified land uses and/or structures proposed on a property that is entirely or partially within 500 feet of a Residential Zone District in consideration of compatibility of site and building design, scale of development, and any impacts related to development with the existing or planned character of those residential zones. Seven-foot-high fence, hedge, or similar opaque barrier required around open storage of materials or waste to screen them from view from all property lines. |                     |
| <b>Minimum Required Frontage and Design Requirements</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                     |

| Requirement                     | Principal Structure                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Accessory Structure                             |
|---------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------|
| Front Yard (ft)                 | 200 (NYS or County HWY)<br>50 (Town or Private HWY)                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Existing principal structure rear line          |
| Side Yard (ft)                  | 25<br>(100 if abutting non-industrial district)                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 25<br>(100 if abutting non-industrial district) |
| Rear Yard (ft)                  | 25<br>(100 if abutting non-industrial district)                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 25<br>(100 if abutting non-industrial district) |
| <b>Performance Standards</b>    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                 |
| Noise and Vibration             | Noise from activities generally limited to a maximum of 70 decibels between 6:00 a.m. and 10:00 p.m., or 60 decibels between 10:00 p.m. and 6:00 a.m., with provisions for limited intermittent exceedances. Activities that result in vibration that creates an unreasonable displacement are prohibited.                                                                                                                                                                                                                    |                                                 |
| Dust and Dirt                   | Activities required to meet USEPA or NYSDEC standards for limiting emissions of soot, cinders or fly ash, other kinds of dust, dirt and other particulate matter. Emissions of dust and/or dirt crossing the property lines of the subject property are prohibited.                                                                                                                                                                                                                                                           |                                                 |
| Smoke, Noxious Gases, and Odors | Activities required to meet USEPA or NYSDEC standards for limiting emissions of smoke. Emissions of noxious acids, fumes, or gases at levels with the potential endanger public health or safety are prohibited. Emissions of odors that are unreasonably offensive are prohibited.                                                                                                                                                                                                                                           |                                                 |
| Lighting and Glare              | Activities that illuminate a property or emit direct or reflected glare that is determined to be unreasonably intense or offensive is prohibited. Lighting of signs, buildings or yards is prohibited, unless it is of intensity, location, direction and shielding that does not impair the vision of any motor vehicle driver. Any activity, structure, or site improvement on property that is entirely or partially within 500 feet of a residential zone district may be subject to more restrictive lighting standards. |                                                 |
| Radiation, Fire, and Safety     | Activities that emit any form or quantities of radioactive materials that are considered unsafe under standards established by NIST or the NYS Department of Labor are prohibited. All buildings, operations, storage, waste disposal, etc. are required to be in conformance with applicable provisions of the NYS Uniform Fire Prevention and Building Code relating to fire protection and safety.                                                                                                                         |                                                 |

Source: Town of Clay Zoning Code.

**D-2.2 Highway Overlay District (Town of Clay)**

The Micron Campus also would be located in the Town of Clay Highway Overlay district, which applies to properties that abut major roadways. The Highway Overlay district was created to protect the function, safety, and efficiency of primary roadways by allowing additional space for roadway expansion while providing for additional setbacks. The district classifies NYS Route 31 as a Type A road, which means it has the potential to become a five-lane roadway. Developments in the Highway Overlay district that would abut Type A roads may include increased lot sizes but would be subject to increased frontage requirements (double the base district minimum), as well as a 165-foot setback for primary structures, a 115-foot setback for accessory structures, and a 90-foot setback for parking areas.

**D-2.3 Residential/Agricultural District (Town of Clay)**

Three parcels in the WPCP are currently zoned as Residential/Agricultural (RA-100). The Childcare Site also would be located in an RA-100 district. RA-100 districts are intended for agricultural activities, low-density family dwellings, and supportive non-residential development. Other uses not specifically permitted in an RA-100 district may need to obtain special use permits from the Town of Clay Planning Board.<sup>15</sup>

**D-2.4 General Commercial District (Town of Cicero)**

Two portions of the Micron Campus would be located in the Town of Cicero General Commercial (GC) district, which permits a mix of commercial uses such as shopping centers, hotels and motels, gas stations, and restaurants. Table D-2 shows the GC bulk regulations.

**Table D-2 Town of Clay GC District Bulk Regulations**

| <b>Dimension</b>      | <b>Bulk Limit</b> |
|-----------------------|-------------------|
| Minimum Building Line | 100 ft.           |
| Minimum Lot Depth     | 200 ft.           |
| Minimum Front Yard    | 50 ft.            |
| Minimum Rear Yard     | 25 ft.            |
| Minimum Side Yard     | 15 ft.            |
| Maximum Coverage      | 40%               |
| Maximum Building Size | 100,000 sq. ft.   |
| Maximum Height        | 60 ft.            |

Source: Town of Cicero Zoning Code

<sup>15</sup> Section 230-13 A (2) (c) [7] of the Town of Clay Zoning Code permits “Special Uses” defined as “An accessory use to a principal use which, because of its unique characteristics, requires special consideration in each case by the Planning Board before a building permit can be issued.”

## References

Town of Cicero (NY) Department of Zoning and Planning. (n.d.). Town of Cicero Zoning Code. <https://ciceronewyork.net/zoning-planning/>. Accessed November 2023.

Town of Clay (NY) Department of Planning and Development. (n.d.). Town of Clay Zoning Code. <https://townofclay.org/forms-permits-info/zoning-codes-map>. Accessed November 2023.

## **Appendix D-3 Public Policies**

### **D-3 Public Policies**

This section summarizes the public policies that would be applicable to the Preferred Action Alternative, including policies related to land use and planning in the local region (e.g., local comprehensive, land use, and transportation plans) and the New York Green CHIPS economic development program. The section includes analyses of the relationship between the Preferred Action Alternative and each of these public policies.

#### **D-3.1 2050 Long Range Transportation Plan 2020 Update**

SMTC adopted its 2050 Long Range Transportation Plan 2020 Update (LRTP) in September 2020 to provide goals, objectives, targets, and performance measures, utilize transportation planning, and lay out capital investments. SMTC amended the LRTP in 2022 to reflect progress on the Interstate 81 Viaduct Project, including by incorporating a new financial analysis and adding anticipated future short-term highway projects to the LRTP.

In developing the LRTP, SMTC reviewed local and regional planning documents and compiled public input to create goals for the future. The LRTP analyzes past and current regional population growth, the region's economic growth, potential future growth patterns, travel, and tourism, and proposed future employment centers. The LRTP specifically identifies the WPCP as a proposed future employment center that would bolster the region's economic growth.

The LRTP comprehensively documents the existing transportation system, examining factors such as freight volumes, challenges and opportunities in freight movement, and issues related to injuries, fatalities, accessibility, mobility, environmental impacts, reliability, preservation, and equity. The LRTP also incorporates predictive modeling for future conditions and evaluates emerging transportation trends, including the potential integration of autonomous vehicles. The LRTP designates I-81 as a key freight corridor and an integral part of the Congestion Management Process (CMP) Freight Network and identifies both I-81 and NYS Route 31 as primary commuter corridors. The LRTP also outlines two designated on-street bike routes: one aligning with NYS Route 31 and the other following U.S. Route 11.

The LRTP identifies future short-term projects, including: capacity improvements on NYS Route 31 at Caughdenoy Road; maintenance on I-81 between NYS Route 31 and Route 49; and railroad grade crossing improvements planned at the intersection of the CSX Railroad with Old Liverpool Road. The LRTP also identifies mid-term projects (2025-2034) including interchange improvements at I-81 and NYS Route 31, and NYS Route 31 intersection turn lanes from Morgan Road to U.S. Route 11 (SMTC, 2020).

##### **D-3.1.1 Analysis**

As the Preferred Action Alternative is not a transportation system improvement project, it would not directly advance the SMTC LRTP's goals relating to the region's transportation system. However, the Preferred Action Alternative would be consistent with SMTC's LRTP goals relating to community planning, which seek to support the planning goals of the region and local communities. This includes supporting smart growth development patterns and commercial and industrial development.

The LRTP specifically identifies the WPCP, where the Micron Campus would be located, as a future employment center to help support the region’s economic growth. The Proposed Project would be adjacent to major roadways evaluated in the LRTP, including I-81, NYS Route 31, and U.S. Route 11. The LRTP includes capacity improvements and upgrades on each of these roads in the short-term, with interchange and intersection improvements identified as mid-term projects.

Section 3.11 (Transportation and Traffic) identifies potential transportation improvement projects that could address anticipated traffic effects from the Proposed Project. The transportation improvements also would address capacity on the roads evaluated in the LRTP and their interchanges, which would support the LRTP’s goal of improving road access to intermodal freight facilities and major freight generators. Any proposed transportation improvements would be subject to review by NYSDOT and the FHWA.

### **D-3.2 Onondaga County Comprehensive Plan**

Onondaga County adopted the Onondaga County Comprehensive Plan (the Comprehensive Plan) in 2023 to envision the future of the County. Through public input, the County developed the Comprehensive Plan around five themes—Strong Centers, Housing and Neighborhoods, Community Mobility, Greenways and Blueways, and Agriculture—and included goals and recommendations for all five themes.

The Comprehensive Plan evaluates the County’s current conditions and trends, which include a decline in job growth, and establishes a global economic competitiveness framework for the County. The Comprehensive Plan recognizes the County’s competitiveness in three defined areas that contribute to regional economic competitiveness—Human Capital, Strong Centers, and Economic Collaboration—but notes the need for continued improvement in Economic Collaboration.<sup>16</sup> Under the Strong Centers theme, the Comprehensive Plan calls for infrastructure investments and economic development to encourage private sector investment and improve the quality of life through the creation of higher paying jobs. It also identifies employment centers, such as industrial parks, as a type of development that should be prioritized for continued investment. The Comprehensive Plan specifically identifies the Proposed Project as a major economic development initiative that would positively influence growth in the region.<sup>17</sup>

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<sup>16</sup> Human Capital, also referred to in the Comprehensive Plan as “Investments in People,” concerns social elements that support growth in the knowledge-based economy, such as support for entrepreneurship, improving quality of life to attract talent, and education. Economic Collaboration concerns coordinated efforts to guide economic development, such as support for institutions that encourage economic growth and developing strong relationships between jurisdictions and with the private sector.

<sup>17</sup> See Comprehensive Plan at 11 (Countywide Profile): “In October 2022 Micron Technology Inc. announced that it would be locating its largest semiconductor manufacturing facility in the Town of Clay, in the northern portion of Onondaga County. This facility is the largest economic development project to date in the history of the nation and will provide 9,000 jobs at the facility and an estimated 40,000 induced jobs in the region, especially in Onondaga County. The location of the plant in the Town of Clay will create a dramatic shift in employment centers. The project will also introduce jobs and an industry that will support our existing and planned mixed-use centers. From the initiation of Plan Onondaga, the planning team has been aware that this type of opportunity was inevitable, and the themes and approaches put forward in this plan are consistent with both a fast-growth and slow-growth reality.”

The Comprehensive Plan includes a land use plan for the County that reflects the County's vision for its future growth, calls for new development and future investment to be concentrated in areas that are served by existing infrastructure, and specifically identifies "centers" throughout the County that have the ability to support additional growth: Traditional Centers (existing walkable, mixed-use, and amenity-rich neighborhoods); Emerging and Town Growth Centers (existing commercial corridors and downtown areas with potential for growth); the City Center (downtown Syracuse); and Employment Centers (locations with potential for increased economic activity, such as manufacturing). The Comprehensive Plan identifies the proposed Micron Campus as a potential Employment Center and nearby locations along the NYS Route 31 and I-81 corridors as Emerging Centers.

The Comprehensive Plan calls for a focus on transit-oriented development near the identified centers and transit corridors and enhancement of the BRT system to support the land use vision for the County. It identifies the portion of I-81 near the proposed Micron Campus as a corridor to target for enhanced BRT services and recommends that the County take a broader approach to the BRT system as it works to advance the WPCP redevelopment that accounts for potential increases in people travelling to and from the site.

### **D-3.2.1 Analysis**

The Preferred Action Alternative would advance key goals in the Comprehensive Plan to expand economic development in Onondaga County. The Comprehensive Plan cites the proposed Micron Campus as an opportunity to bolster the County's competitiveness in Human Capital, Strong Centers, and Economic Collaboration. The Proposed Project also would support the Comprehensive Plan's recommendations relating to continued investment in industrial parks and other businesses that would bring high paying jobs to the County and promote development near existing utilities and transit corridors. The Proposed Project would become an Employment Center under the Comprehensive Plan capable of driving the County's economic development goals.

The Proposed Project would not directly advance some of the Comprehensive Plan's goals relating to development of key Employment Centers; in particular, the Proposed Project would not include improvements to public transit such as expansion of BRT services, which were actions intended to be taken by the County.

### **D-3.3 Town of Clay Northern Land Use Study**

The Town of Clay adopted its Northern Land Use Study (NLUS) in 2013 to guide Town officials and planners with regard to future land use development in the northern portion of the Town. It evaluates existing land uses in the area north of NYS Route 31 as well as development-constraining features, such as sewage and water access, wetlands, soils, and floodplains. The NLUS aims to preserve open space and project future patterns of growth, and includes a plan for appropriate land uses adjacent to the Town of Cicero.

The NLUS encompasses three main themes: environmental, economic, and public infrastructure. The study's environmental objectives focus on safeguarding environmentally sensitive areas, preserving open space, and mitigating the development impacts on water quality. The NLUS also recognizes the Town of Clay Local Waterfront Revitalization Program as part of

an overarching goal to protect riverfront areas in the Town. The NLUS includes recommendations to maintain the rural character of the area by focusing growth in suitable locations. These recommendations include permitting higher-density, large-lot residential uses with a minimum lot size of 100,000 sq. ft and encouraging cluster developments with minimum lot sizes of 40,000 sq. ft. where suitable.

The NLUS' economic goals include promoting the development of the WPCP and leveraging its proximity to I-81 and essential public infrastructure. The NLUS also includes a public infrastructure goal that calls for restricting sewer and water extensions north of NYS Route 31 except as needed to support the WPCP redevelopment.

The NLUS also finds that the OOWWTP would have the capacity to support a large manufacturing use with substantial water requirements located on the WPCP property.

Finally, the NLUS notes that NYS Route 31 is currently operating at full capacity and recommends that any proposed future development that would increase the intensity of uses in Northern Clay provide adequate traffic impact. The NLUS states that such future development should also consider access points and development of alternative transportation routes to NYS Route 31 (Town of Clay Department of Planning and Development, 2013).

#### **D-3.3.1 Analysis**

The Preferred Action Alternative would be generally consistent with the economic growth and development goals in the NLUS. In particular, construction of the Micron Campus would fulfill the study's goal to establish an industrial development at the WPCP. The Proposed Project also would fulfill goals in the NLUS to expand water supply infrastructure and sewer systems near the WPCP and increase the OOWWTP's capacity to serve a large industrial development. Although construction of the manufacturing facility on the Micron Campus would not support the NLUS' goal to preserve the rural character of the area, it would be consistent with the study's goal to concentrate larger-scale development around the WPCP while the Town undertakes efforts to relieve development pressure in other rural areas further away from the I-81 corridor and public infrastructure.

#### **D-3.4 Town of Cicero Comprehensive Plan**

The Town of Cicero initiated a process to establish its first comprehensive plan in late 2022, which would supersede a draft plan from 2006 that was not adopted. In November 2024, the Town released a draft of the new Comprehensive Plan, titled Vision Cicero, which is currently undergoing public review and is expected to be adopted in 2025. Although Vision Cicero has not been formally adopted, the draft Comprehensive Plan is considered here.

Vision Cicero is intended as a guide for decision-making relating to growth, with a focus on promoting balanced growth, sustainability, and preservation of the town's community character and quality of life. The plan specifically identifies the Proposed Project as a major potential factor

for economic growth that would likely bring jobs and infrastructure development to the area.<sup>18</sup> At the same time, Vision Cicero acknowledges that potential effects of the Proposed Project on growth would present challenges, particularly the need for an expanded transportation network, diverse housing options, and expanded public services. As a whole, Vision Cicero cites the Proposed Project as “a once in a generation opportunity to improve our already high quality of life.”

Vision Cicero includes goals relating to housing and residential growth, transportation, public services to enhance quality of life, economic development and business growth, preservation of natural areas, and sustainability. Vision Cicero’s economic development goal focuses on attracting and supporting the economic growth that the Proposed Project would likely generate by calling for marketing efforts to attract businesses, particularly in the semiconductor industry, upgrades to Town infrastructure to support businesses, and identifying opportunities for additional industrial development along the Town’s major freight corridors.

Vision Cicero includes a land use plan intended as a guide for future land use decisions, including a comprehensive update to the Town zoning code that is anticipated to follow the adoption of the Comprehensive Plan. The land use plan identifies the area along the U.S. Route 11 corridor as an area of commercial and light industrial development with potential to attract new businesses, including high-tech manufacturing facilities. The land use plan also identifies higher density residential and other development areas near the U.S. Route 11 corridor (referred to as Regional Mixed Use, Mixed Residential, and Town Center areas) with potential to facilitate a variety of housing types and increase the housing supply to meet the increased demand and growth the Proposed Project would likely generate in the area (Town of Cicero, 2024).

### **D-3.4.1 Analysis**

Although the proposed Micron Campus manufacturing facility would be located in the Town of Clay and only two portions of the campus with access roads, driveways, and utility lines would be located in the Town of Cicero, the Preferred Action Alternative would be generally consistent with Vision Cicero and would directly support the plan’s primary economic development goal. In addition, the Proposed Project would be consistent with the Vision Cicero land use plan, which is intended to attract high-tech businesses, including those that would serve Micron’s supply chain, to the U.S. Route 11 corridor.

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<sup>18</sup> See Vision Cicero at 10 (Micron Technology Invests in CNY): “The Micron semiconductor manufacturing facility is expected to generate a significant number of jobs and have a substantial economic impact on the central New York region. The plant will create approximately 9,000 direct high-tech jobs over the next 20 years, with positions ranging from engineering and manufacturing to maintenance and administrative roles. In addition to these direct jobs, the construction phase alone is projected to support around 5,000 temporary jobs. Beyond direct employment, the Micron facility will also create tens of thousands of indirect jobs across various sectors, including suppliers, logistics, construction, and service industries that will support both the plant and the growing workforce. The influx of workers will likely boost local demand for housing, retail, and services, leading to further job creation in these sectors. The broader economic impact is expected to be transformative for the region ... The Micron plant will act as a catalyst for broader economic growth in Cicero. Increased demand for housing, retail, and services will likely spur new residential and commercial development, particularly along major corridors like I-81, Route 11, and Route 31.”

The Proposed Project would not directly support some of the plan's goals; in particular, it would not directly provide any housing or enhanced public services to support the anticipated residential growth and would not provide for enhanced mixed-modal transportation options. However, the Proposed Project would include infrastructure improvements to support the manufacturing use (generally located in the Town of Clay and outlying areas, and not in the Town of Cicero) and traffic mitigation to address capacity on major roadways (discussed in Section 3.11, Transportation and Traffic), consistent with the plan's recommendations to support growth. The Proposed Project is also consistent with Vision Cicero's land use plan, which identifies the area that contains the Micron Campus as an area for commercial and light industrial development. Therefore, the Preferred Action Alternative is generally consistent with Vision Cicero.

### **D-3.5 New York Green CHIPS Program**

In 2022, the New York State Legislature enacted the Green CHIPS Program, which includes approximately \$10 billion in economic incentives for environmentally friendly semiconductor manufacturing projects with the potential to create thousands of jobs in the State and address issues relating to semiconductor supply chain shortages, inflation, and national security. The Green CHIPS Program includes several provisions to help reduce the cost of constructing and operating semiconductor manufacturing facilities.

To receive benefits under the Green CHIPS Program, a project must be qualified through an application to the State Urban Development Corporation (also known as ESD). There are several requirements to qualify as a Green CHIPS facility, including creating a minimum of 500 new jobs and providing \$3 billion in investment over a 10-year period. Projects also must adopt sustainability measures to mitigate greenhouse gas emissions, pay construction workers a federal prevailing wage, and commit to worker and community investment, including training and educational programs to expand employment opportunities for economically disadvantaged individuals. Projects may apply for an additional 10 years of benefits, subject to new job requirements, capital expenditures, and ESD approval, which may allow some Green CHIPS projects to be eligible for 20 years of incentives.

Incentives available to Green CHIPS projects include a tax credit for research and development expenditures and an investment tax credit for capital expenditures. The Program also offers a tax credit on salaries and wages, and a real property tax credit. The Program also includes reductions in private utility services through discounted delivery rates. Green CHIPS projects that achieve their job and investment commitments and meet eligibility requirements are eligible for refundable tax credits under ESD's Excelsior Jobs Program, a pay-for-performance program that allows companies to receive tax credits as they meet investment and job targets.

#### **D-3.5.1 Analysis**

The Proposed Project would use incentives from the New York Green CHIPS Program, enacted in August 2022 to provide financial support for on-shoring semiconductor manufacturing to spur economic growth in New York State. To be eligible to receive Green CHIPS Program incentives, Micron must meet the statutory requirements of creating at least 500 new jobs, adopting sustainability measures to reduce GHG emissions (see Section 3.7, Greenhouse Gas Emissions, Climate Change, and Climate Resiliency), paying construction workers the Federal prevailing

wage, and committing to worker and community investments. In furtherance of the Green CHIPS Program and New York’s policy of incentivizing semiconductor manufacturing in New York, in September 2022, Micron, ESD, Onondaga County and OCIDA entered into a “Key Terms and Conditions for Development of the Micron Green Manufacturing Memory Chip Fab Campus in Clay, New York” (“Term Sheet”) to incentivize Micron to locate a semiconductor facility at the WPCP.

The Term Sheet outlines Micron’s commitments to creating more than 9,000 new jobs and paying the Federal prevailing wage to construction workers, and further outlines preliminary sustainability commitments designed to reduce GHG emissions. The Term Sheet further illustrates Micron’s commitments to worker and community investments, including a CIF of \$500 million for CNY communities, which will be used to develop the local workforce, invest in education throughout CNY, promote affordable housing, and provide additional benefits to CNY communities. Micron also committed to installing on-site renewable energy systems and implementing water conservation and efficiency measures.

## References

Empire State Development (ESD). (n.d.). *New York State's Green CHIPS Program*.

<https://esd.ny.gov/green-chips>. Accessed December 2023.

Onondaga County. (2023). *Plan Onondaga County Comprehensive Plan*.

<https://plan.ongov.net/the-plan/>

SMTC. (2020). *2050 Long Range Transportation Plan 2020 Update*. <https://smtcmpo.org/wp-content/uploads/lrtp/2050-LRTP-Update-Full-Doc-2020.10.08.pdf>

Town of Cicero. (2024). *Vision Cicero: Town of Cicero Comprehensive Plan (Draft)*.

<https://www.visioncicero.com/>. Accessed November 2024.

Town of Clay Department of Planning and Development. (2013). *Town of Clay Northern Land Use Study*.

**Appendix D-4**  
**NRCS FPPA Review Documents**

**FARMLAND CONVERSION IMPACT RATING**

|                                                                                                                                                                             |                                                                    |                                                                     |                             |                                                                                                          |                              |          |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------|---------------------------------------------------------------------|-----------------------------|----------------------------------------------------------------------------------------------------------|------------------------------|----------|
| <b>PART I</b> (To be completed by Federal Agency)                                                                                                                           |                                                                    | Date Of Land Evaluation Request <b>November 27, 2024</b>            |                             |                                                                                                          |                              |          |
| Name of Project <b>Micron Clay Fab Facility</b>                                                                                                                             |                                                                    | Federal Agency Involved <b>CHIPS Program Office</b>                 |                             |                                                                                                          |                              |          |
| Proposed Land Use <b>Industrial and Commercial</b>                                                                                                                          |                                                                    | County and State <b>Onondaga, New York</b>                          |                             |                                                                                                          |                              |          |
| <b>PART II</b> (To be completed by NRCS)                                                                                                                                    |                                                                    | Date Request Received By NRCS <b>11/27/2024</b>                     |                             | Person Completing Form: <b>Daniel Ufnar</b>                                                              |                              |          |
| Does the site contain Prime, Unique, Statewide or Local Important Farmland?<br><i>(If no, the FPPA does not apply - do not complete additional parts of this form)</i>      |                                                                    | YES <input checked="" type="checkbox"/>                             | NO <input type="checkbox"/> | Acres Irrigated <b>1330</b>                                                                              | Average Farm Size <b>258</b> |          |
| Major Crop(s)<br><b>Hay, corn</b>                                                                                                                                           | Farmable Land In Govt. Jurisdiction<br>Acres: <b>292912% 58.65</b> | Amount of Farmland As Defined in FPPA<br>Acres: <b>29291% 58.65</b> |                             |                                                                                                          |                              |          |
| Name of Land Evaluation System Used<br><b>Onondaga County LESA</b>                                                                                                          | Name of State or Local Site Assessment System<br><b>NA</b>         | Date Land Evaluation Returned by NRCS<br><b>12/05/2024</b>          |                             |                                                                                                          |                              |          |
| <b>PART III</b> (To be completed by Federal Agency)                                                                                                                         |                                                                    | Alternative Site Rating                                             |                             |                                                                                                          |                              |          |
|                                                                                                                                                                             |                                                                    | Site A                                                              | Site B                      | Site C                                                                                                   | Site D                       |          |
| A. Total Acres To Be Converted Directly                                                                                                                                     |                                                                    | <b>1081</b>                                                         |                             |                                                                                                          |                              |          |
| B. <u>Total</u> Acres To Be Converted Indirectly                                                                                                                            |                                                                    | <b>56</b>                                                           |                             |                                                                                                          |                              |          |
| C. Total Acres In Site                                                                                                                                                      |                                                                    | <b>1685</b>                                                         |                             |                                                                                                          |                              |          |
| <b>PART IV</b> (To be completed by NRCS) Land Evaluation Information                                                                                                        |                                                                    |                                                                     |                             |                                                                                                          |                              |          |
| A. Total Acres Prime And Unique Farmland                                                                                                                                    |                                                                    | <b>1073.1</b>                                                       |                             |                                                                                                          |                              |          |
| B. Total Acres Statewide Important or Local Important Farmland                                                                                                              |                                                                    | <b>63.8</b>                                                         |                             |                                                                                                          |                              |          |
| C. Percentage Of Farmland in County Or Local Govt. Unit To Be Converted                                                                                                     |                                                                    | <b>0.39</b>                                                         |                             |                                                                                                          |                              |          |
| D. Percentage Of Farmland in Govt. Jurisdiction With Same Or Higher Relative Value                                                                                          |                                                                    | <b>36.4</b>                                                         |                             |                                                                                                          |                              |          |
| <b>PART V</b> (To be completed by NRCS) Land Evaluation Criterion<br>Relative Value of Farmland To Be Converted (Scale of 0 to 100 Points)                                  |                                                                    | <b>70.4</b>                                                         |                             |                                                                                                          |                              |          |
| <b>PART VI</b> (To be completed by Federal Agency) Site Assessment Criteria<br><i>(Criteria are explained in 7 CFR 658.5 b. For Corridor project use form NRCS-CPA-106)</i> |                                                                    | <b>Maximum Points</b>                                               | Site A                      | Site B                                                                                                   | Site C                       | Site D   |
| 1. Area In Non-urban Use                                                                                                                                                    |                                                                    | (15)                                                                | <b>8</b>                    |                                                                                                          |                              |          |
| 2. Perimeter In Non-urban Use                                                                                                                                               |                                                                    | (10)                                                                | <b>5</b>                    |                                                                                                          |                              |          |
| 3. Percent Of Site Being Farmed                                                                                                                                             |                                                                    | (20)                                                                | <b>0</b>                    |                                                                                                          |                              |          |
| 4. Protection Provided By State and Local Government                                                                                                                        |                                                                    | (20)                                                                | <b>0</b>                    |                                                                                                          |                              |          |
| 5. Distance From Urban Built-up Area                                                                                                                                        |                                                                    | (15)                                                                | <b>0</b>                    |                                                                                                          |                              |          |
| 6. Distance To Urban Support Services                                                                                                                                       |                                                                    | (15)                                                                | <b>10</b>                   |                                                                                                          |                              |          |
| 7. Size Of Present Farm Unit Compared To Average                                                                                                                            |                                                                    | (10)                                                                | <b>0</b>                    |                                                                                                          |                              |          |
| 8. Creation Of Non-farmable Farmland                                                                                                                                        |                                                                    | (10)                                                                | <b>1</b>                    |                                                                                                          |                              |          |
| 9. Availability Of Farm Support Services                                                                                                                                    |                                                                    | (5)                                                                 | <b>5</b>                    |                                                                                                          |                              |          |
| 10. On-Farm Investments                                                                                                                                                     |                                                                    | (20)                                                                | <b>3</b>                    |                                                                                                          |                              |          |
| 11. Effects Of Conversion On Farm Support Services                                                                                                                          |                                                                    | (10)                                                                | <b>0</b>                    |                                                                                                          |                              |          |
| 12. Compatibility With Existing Agricultural Use                                                                                                                            |                                                                    | (10)                                                                | <b>5</b>                    |                                                                                                          |                              |          |
| TOTAL SITE ASSESSMENT POINTS                                                                                                                                                |                                                                    | <b>160</b>                                                          | <b>37</b>                   | <b>0</b>                                                                                                 | <b>0</b>                     | <b>0</b> |
| <b>PART VII</b> (To be completed by Federal Agency)                                                                                                                         |                                                                    |                                                                     |                             |                                                                                                          |                              |          |
| Relative Value Of Farmland (From Part V)                                                                                                                                    |                                                                    | 100                                                                 | <b>70.4</b>                 | <b>0</b>                                                                                                 | <b>0</b>                     | <b>0</b> |
| Total Site Assessment (From Part VI above or local site assessment)                                                                                                         |                                                                    | 160                                                                 | <b>37</b>                   | <b>0</b>                                                                                                 | <b>0</b>                     | <b>0</b> |
| <b>TOTAL POINTS (Total of above 2 lines)</b>                                                                                                                                |                                                                    | <b>260</b>                                                          | <b>107.4</b>                | <b>0</b>                                                                                                 | <b>0</b>                     | <b>0</b> |
| Site Selected: <b>A</b>                                                                                                                                                     |                                                                    | Date Of Selection <b>12/16/24</b>                                   |                             | Was A Local Site Assessment Used?<br>YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> |                              |          |
| Reason For Selection:<br><b>Overall score for Site A is 107.4, indicating it did not approach the score that would require consideration of alternative sites.</b>          |                                                                    |                                                                     |                             |                                                                                                          |                              |          |
| Name of Federal agency representative completing this form: <b>David Frenkel</b>                                                                                            |                                                                    |                                                                     |                             |                                                                                                          | Date: <b>1/08/2025</b>       |          |

## STEPS IN THE PROCESSING THE FARMLAND AND CONVERSION IMPACT RATING FORM

- Step 1 - Federal agencies (or Federally funded projects) involved in proposed projects that may convert farmland, as defined in the Farmland Protection Policy Act (FPPA) to nonagricultural uses, will initially complete Parts I and III of the form. For Corridor type projects, the Federal agency shall use form NRCS-CPA-106 in place of form AD-1006. The Land Evaluation and Site Assessment (LESA) process may also be accessed by visiting the FPPA website, <http://fppa.nrcs.usda.gov/lesa/>.
- Step 2 - Originator (Federal Agency) will send one original copy of the form together with appropriate scaled maps indicating location(s) of project site(s), to the Natural Resources Conservation Service (NRCS) local Field Office or USDA Service Center and retain a copy for their files. (NRCS has offices in most counties in the U.S. The USDA Office Information Locator may be found at [http://offices.usda.gov/scripts/ndISAPI.dll/oip\\_public/USA\\_map](http://offices.usda.gov/scripts/ndISAPI.dll/oip_public/USA_map), or the offices can usually be found in the Phone Book under U.S. Government, Department of Agriculture. A list of field offices is available from the NRCS State Conservationist and State Office in each State.)
- Step 3 - NRCS will, within 10 working days after receipt of the completed form, make a determination as to whether the site(s) of the proposed project contains prime, unique, statewide or local important farmland. (When a site visit or land evaluation system design is needed, NRCS will respond within 30 working days.
- Step 4 - For sites where farmland covered by the FPPA will be converted by the proposed project, NRCS will complete Parts II, IV and V of the form.
- Step 5 - NRCS will return the original copy of the form to the Federal agency involved in the project, and retain a file copy for NRCS records.
- Step 6 - The Federal agency involved in the proposed project will complete Parts VI and VII of the form and return the form with the final selected site to the servicing NRCS office.
- Step 7 - The Federal agency providing financial or technical assistance to the proposed project will make a determination as to whether the proposed conversion is consistent with the FPPA.

## INSTRUCTIONS FOR COMPLETING THE FARMLAND CONVERSION IMPACT RATING FORM

*(For Federal Agency)*

**Part I:** When completing the "County and State" questions, list all the local governments that are responsible for local land use controls where site(s) are to be evaluated.

**Part III:** When completing item B (Total Acres To Be Converted Indirectly), include the following:

1. Acres not being directly converted but that would no longer be capable of being farmed after the conversion, because the conversion would restrict access to them or other major change in the ability to use the land for agriculture.
2. Acres planned to receive services from an infrastructure project as indicated in the project justification (e.g. highways, utilities planned build out capacity) that will cause a direct conversion.

**Part VI:** Do not complete Part VI using the standard format if a State or Local site assessment is used. With local and NRCS assistance, use the local Land Evaluation and Site Assessment (LESA).

1. Assign the maximum points for each site assessment criterion as shown in § 658.5(b) of CFR. In cases of corridor-type project such as transportation, power line and flood control, criteria #5 and #6 will not apply and will, be weighted zero, however, criterion #8 will be weighed a maximum of 25 points and criterion #11 a maximum of 25 points.
2. Federal agencies may assign relative weights among the 12 site assessment criteria other than those shown on the FPPA rule after submitting individual agency FPPA policy for review and comment to NRCS. In all cases where other weights are assigned, relative adjustments must be made to maintain the maximum total points at 160. For project sites where the total points equal or exceed 160, consider alternative actions, as appropriate, that could reduce adverse impacts (e.g. Alternative Sites, Modifications or Mitigation).

**Part VII:** In computing the "Total Site Assessment Points" where a State or local site assessment is used and the total maximum number of points is other than 160, convert the site assessment points to a base of 160.

Example: if the Site Assessment maximum is 200 points, and the alternative Site "A" is rated 180 points:

$$\frac{\text{Total points assigned Site A}}{\text{Maximum points possible}} = \frac{180}{200} \times 160 = 144 \text{ points for Site A}$$

For assistance in completing this form or FPPA process, contact the local NRCS Field Office or USDA Service Center.

NRCS employees, consult the FPPA Manual and/or policy for additional instructions to complete the AD-1006 form.

**FARMLAND CONVERSION IMPACT RATING  
FOR CORRIDOR TYPE PROJECTS**

|                                                                                                                                                                                                                                               |                                                                                    |                                                                                |                                                  |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------|--------------------------------------------------------------------------------|--------------------------------------------------|
| <b>PART I (To be completed by Federal Agency)</b>                                                                                                                                                                                             |                                                                                    | 3. Date of Land Evaluation Request<br><b>11/27/24</b>                          | 4. Sheet 1 of _____                              |
| 1. Name of Project <b>Micron Clay Fab Facility</b>                                                                                                                                                                                            |                                                                                    | 5. Federal Agency Involved <b>CHIPS Program Office</b>                         |                                                  |
| 2. Type of Project <b>Industrial and Commercial</b>                                                                                                                                                                                           |                                                                                    | 6. County and State <b>Onondaga, New York</b>                                  |                                                  |
| <b>PART II (To be completed by NRCS)</b>                                                                                                                                                                                                      |                                                                                    | 1. Date Request Received by NRCS<br><b>11/27/24</b>                            | 2. Person Completing Form<br><b>Daniel Ufnar</b> |
| 3. Does the corridor contain prime, unique statewide or local important farmland?<br>(If no, the FPPA does not apply - Do not complete additional parts of this form).<br>YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> |                                                                                    | 4. Acres Irrigated<br><b>1330</b>                                              | Average Farm Size<br><b>258</b>                  |
| 5. Major Crop(s)<br><b>Hay, corn</b>                                                                                                                                                                                                          | 6. Farmable Land in Government Jurisdiction<br>Acres: <b>292912</b> % <b>58.65</b> | 7. Amount of Farmland As Defined in FPPA<br>Acres: <b>292912</b> % <b>58.6</b> |                                                  |
| 8. Name Of Land Evaluation System Used<br><b>Onondaga County LESA</b>                                                                                                                                                                         | 9. Name of Local Site Assessment System<br><b>NA</b>                               | 10. Date Land Evaluation Returned by NRCS<br><b>12/5/24</b>                    |                                                  |

| <b>PART III (To be completed by Federal Agency)</b>               | <b>Alternative Corridor For Segment</b> |                   |                   |                   |
|-------------------------------------------------------------------|-----------------------------------------|-------------------|-------------------|-------------------|
|                                                                   | <b>Corridor A</b>                       | <b>Corridor B</b> | <b>Corridor C</b> | <b>Corridor D</b> |
| A. Total Acres To Be Converted Directly                           | <b>0</b>                                |                   |                   |                   |
| B. Total Acres To Be Converted Indirectly, Or To Receive Services | <b>288</b>                              |                   |                   |                   |
| C. Total Acres In Corridor                                        | <b>426</b>                              |                   |                   |                   |

| <b>PART IV (To be completed by NRCS) Land Evaluation Information</b>               |              |
|------------------------------------------------------------------------------------|--------------|
| A. Total Acres Prime And Unique Farmland                                           | <b>99.7</b>  |
| B. Total Acres Statewide And Local Important Farmland                              | <b>8.4</b>   |
| C. Percentage Of Farmland in County Or Local Govt. Unit To Be Converted            | <b>0.037</b> |
| D. Percentage Of Farmland in Govt. Jurisdiction With Same Or Higher Relative Value | <b>36.4</b>  |

| <b>PART V (To be completed by NRCS) Land Evaluation Information Criterion Relative value of Farmland to Be Serviced or Converted (Scale of 0 - 100 Points)</b> |             |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|
|                                                                                                                                                                | <b>72.2</b> |

| <b>PART VI (To be completed by Federal Agency) Corridor Assessment Criteria (These criteria are explained in 7 CFR 658.5(c))</b> | Maximum Points |           |          |          |          |
|----------------------------------------------------------------------------------------------------------------------------------|----------------|-----------|----------|----------|----------|
| 1. Area in Nonurban Use                                                                                                          | 15             | <b>6</b>  |          |          |          |
| 2. Perimeter in Nonurban Use                                                                                                     | 10             | <b>8</b>  |          |          |          |
| 3. Percent Of Corridor Being Farmed                                                                                              | 20             | <b>8</b>  |          |          |          |
| 4. Protection Provided By State And Local Government                                                                             | 20             | <b>0</b>  |          |          |          |
| 5. Size of Present Farm Unit Compared To Average                                                                                 | 10             | <b>0</b>  |          |          |          |
| 6. Creation Of Nonfarmable Farmland                                                                                              | 25             | <b>0</b>  |          |          |          |
| 7. Availability Of Farm Support Services                                                                                         | 5              | <b>5</b>  |          |          |          |
| 8. On-Farm Investments                                                                                                           | 20             | <b>12</b> |          |          |          |
| 9. Effects Of Conversion On Farm Support Services                                                                                | 25             | <b>0</b>  |          |          |          |
| 10. Compatibility With Existing Agricultural Use                                                                                 | 10             | <b>5</b>  |          |          |          |
| <b>TOTAL CORRIDOR ASSESSMENT POINTS</b>                                                                                          | <b>160</b>     | <b>44</b> | <b>0</b> | <b>0</b> | <b>0</b> |

| <b>PART VII (To be completed by Federal Agency)</b>                       |            |              |          |          |          |
|---------------------------------------------------------------------------|------------|--------------|----------|----------|----------|
| Relative Value Of Farmland (From Part V)                                  | 100        | <b>72.2</b>  | <b>0</b> | <b>0</b> | <b>0</b> |
| Total Corridor Assessment (From Part VI above or a local site assessment) | 160        | <b>44</b>    | <b>0</b> | <b>0</b> | <b>0</b> |
| <b>TOTAL POINTS (Total of above 2 lines)</b>                              | <b>260</b> | <b>116.2</b> | <b>0</b> | <b>0</b> | <b>0</b> |

|                                   |                                                                       |                                          |                                                                                                             |
|-----------------------------------|-----------------------------------------------------------------------|------------------------------------------|-------------------------------------------------------------------------------------------------------------|
| 1. Corridor Selected:<br><b>A</b> | 2. Total Acres of Farmlands to be Converted by Project:<br><b>288</b> | 3. Date Of Selection:<br><b>12/16/24</b> | 4. Was A Local Site Assessment Used?<br>YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> |
|-----------------------------------|-----------------------------------------------------------------------|------------------------------------------|-------------------------------------------------------------------------------------------------------------|

5. Reason For Selection:  
**Overall score for Corridor A within Onondaga County is 116.2, indicating it did not approach the score that would require consideration of alternative corridors.**

Signature of Person Completing this Part: *David Frenkel* DATE: **1/8/25**

NOTE: Complete a form for each segment with more than one Alternate Corridor

## CORRIDOR - TYPE SITE ASSESSMENT CRITERIA

The following criteria are to be used for projects that have a linear or corridor - type site configuration connecting two distant points, and crossing several different tracts of land. These include utility lines, highways, railroads, stream improvements, and flood control systems. Federal agencies are to assess the suitability of each corridor - type site or design alternative for protection as farmland along with the land evaluation information.

(1) How much land is in nonurban use within a radius of 1.0 mile from where the project is intended?

More than 90 percent - 15 points  
90 to 20 percent - 14 to 1 point(s)  
Less than 20 percent - 0 points

(2) How much of the perimeter of the site borders on land in nonurban use?

More than 90 percent - 10 points  
90 to 20 percent - 9 to 1 point(s)  
Less than 20 percent - 0 points

(3) How much of the site has been farmed (managed for a scheduled harvest or timber activity) more than five of the last 10 years?

More than 90 percent - 20 points  
90 to 20 percent - 19 to 1 point(s)  
Less than 20 percent - 0 points

(4) Is the site subject to state or unit of local government policies or programs to protect farmland or covered by private programs to protect farmland?

Site is protected - 20 points  
Site is not protected - 0 points

(5) Is the farm unit(s) containing the site (before the project) as large as the average - size farming unit in the County ?

(Average farm sizes in each county are available from the NRCS field offices in each state. Data are from the latest available Census of Agriculture, Acreage or Farm Units in Operation with \$1,000 or more in sales.)  
As large or larger - 10 points  
Below average - deduct 1 point for each 5 percent below the average, down to 0 points if 50 percent or more below average - 9 to 0 points

(6) If the site is chosen for the project, how much of the remaining land on the farm will become non-farmable because of interference with land patterns?

Acreage equal to more than 25 percent of acres directly converted by the project - 25 points  
Acreage equal to between 25 and 5 percent of the acres directly converted by the project - 1 to 24 point(s)  
Acreage equal to less than 5 percent of the acres directly converted by the project - 0 points

(7) Does the site have available adequate supply of farm support services and markets, i.e., farm suppliers, equipment dealers, processing and storage facilities and farmer's markets?

All required services are available - 5 points  
Some required services are available - 4 to 1 point(s)  
No required services are available - 0 points

(8) Does the site have substantial and well-maintained on-farm investments such as barns, other storage building, fruit trees and vines, field terraces, drainage, irrigation, waterways, or other soil and water conservation measures?

High amount of on-farm investment - 20 points  
Moderate amount of on-farm investment - 19 to 1 point(s)  
No on-farm investment - 0 points

(9) Would the project at this site, by converting farmland to nonagricultural use, reduce the demand for farm support services so as to jeopardize the continued existence of these support services and thus, the viability of the farms remaining in the area?

Substantial reduction in demand for support services if the site is converted - 25 points  
Some reduction in demand for support services if the site is converted - 1 to 24 point(s)  
No significant reduction in demand for support services if the site is converted - 0 points

(10) Is the kind and intensity of the proposed use of the site sufficiently incompatible with agriculture that it is likely to contribute to the eventual conversion of surrounding farmland to nonagricultural use?

Proposed project is incompatible to existing agricultural use of surrounding farmland - 10 points  
Proposed project is tolerable to existing agricultural use of surrounding farmland - 9 to 1 point(s)  
Proposed project is fully compatible with existing agricultural use of surrounding farmland - 0 points

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**FARMLAND CONVERSION IMPACT RATING  
FOR CORRIDOR TYPE PROJECTS**

|                                                                                                                                                                                                                                            |                                                                                    |                                                                                |                                                  |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------|--------------------------------------------------------------------------------|--------------------------------------------------|
| <b>PART I (To be completed by Federal Agency)</b>                                                                                                                                                                                          |                                                                                    | 3. Date of Land Evaluation Request<br><b>11/27/24</b>                          | 4. Sheet 1 of _____                              |
| 1. Name of Project <b>Micron Clay Fab Facility</b>                                                                                                                                                                                         |                                                                                    | 5. Federal Agency Involved <b>CHIPS Program Office</b>                         |                                                  |
| 2. Type of Project <b>Industrial and Commercial</b>                                                                                                                                                                                        |                                                                                    | 6. County and State <b>Oswego, New York</b>                                    |                                                  |
| <b>PART II (To be completed by NRCS)</b>                                                                                                                                                                                                   |                                                                                    | 1. Date Request Received by NRCS<br><b>11/27/24</b>                            | 2. Person Completing Form<br><b>Daniel Ufnar</b> |
| 3. Does the corridor contain prime, unique statewide or local important farmland?<br>(If no, the FPPA does not apply - Do not complete additional parts of this form). YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> |                                                                                    | 4. Acres Irrigated<br><b>752</b>                                               | Average Farm Size<br><b>141</b>                  |
| 5. Major Crop(s)<br><b>Hay</b>                                                                                                                                                                                                             | 6. Farmable Land in Government Jurisdiction<br>Acres: <b>241049</b> % <b>39.51</b> | 7. Amount of Farmland As Defined in FPPA<br>Acres: <b>241049</b> % <b>39.5</b> |                                                  |
| 8. Name Of Land Evaluation System Used<br><b>Oswego County LESA</b>                                                                                                                                                                        | 9. Name of Local Site Assessment System<br><b>NA</b>                               | 10. Date Land Evaluation Returned by NRCS<br><b>12/5/24</b>                    |                                                  |

| <b>PART III (To be completed by Federal Agency)</b>               | <b>Alternative Corridor For Segment</b> |            |            |            |
|-------------------------------------------------------------------|-----------------------------------------|------------|------------|------------|
|                                                                   | Corridor A                              | Corridor B | Corridor C | Corridor D |
| A. Total Acres To Be Converted Directly                           | <b>0</b>                                |            |            |            |
| B. Total Acres To Be Converted Indirectly, Or To Receive Services | <b>288</b>                              |            |            |            |
| C. Total Acres In Corridor                                        | <b>426</b>                              |            |            |            |

| <b>PART IV (To be completed by NRCS) Land Evaluation Information</b>               |              |
|------------------------------------------------------------------------------------|--------------|
| A. Total Acres Prime And Unique Farmland                                           | <b>102</b>   |
| B. Total Acres Statewide And Local Important Farmland                              | <b>78.1</b>  |
| C. Percentage Of Farmland in County Or Local Govt. Unit To Be Converted            | <b>0.075</b> |
| D. Percentage Of Farmland in Govt. Jurisdiction With Same Or Higher Relative Value | <b>9.3</b>   |

|                                                                                                                                                                |           |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|
| <b>PART V (To be completed by NRCS) Land Evaluation Information Criterion Relative value of Farmland to Be Serviced or Converted (Scale of 0 - 100 Points)</b> | <b>49</b> |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|

| <b>PART VI (To be completed by Federal Agency) Corridor Assessment Criteria (These criteria are explained in 7 CFR 658.5(c))</b> | Maximum Points |           |          |          |          |
|----------------------------------------------------------------------------------------------------------------------------------|----------------|-----------|----------|----------|----------|
| 1. Area in Nonurban Use                                                                                                          | <b>15</b>      | <b>2</b>  |          |          |          |
| 2. Perimeter in Nonurban Use                                                                                                     | <b>10</b>      | <b>5</b>  |          |          |          |
| 3. Percent Of Corridor Being Farmed                                                                                              | <b>20</b>      | <b>0</b>  |          |          |          |
| 4. Protection Provided By State And Local Government                                                                             | <b>20</b>      | <b>20</b> |          |          |          |
| 5. Size of Present Farm Unit Compared To Average                                                                                 | <b>10</b>      | <b>1</b>  |          |          |          |
| 6. Creation Of Nonfarmable Farmland                                                                                              | <b>25</b>      | <b>1</b>  |          |          |          |
| 7. Availability Of Farm Support Services                                                                                         | <b>5</b>       | <b>5</b>  |          |          |          |
| 8. On-Farm Investments                                                                                                           | <b>20</b>      | <b>1</b>  |          |          |          |
| 9. Effects Of Conversion On Farm Support Services                                                                                | <b>25</b>      | <b>0</b>  |          |          |          |
| 10. Compatibility With Existing Agricultural Use                                                                                 | <b>10</b>      | <b>5</b>  |          |          |          |
| <b>TOTAL CORRIDOR ASSESSMENT POINTS</b>                                                                                          | <b>160</b>     | <b>40</b> | <b>0</b> | <b>0</b> | <b>0</b> |

| <b>PART VII (To be completed by Federal Agency)</b>                       |            |           |          |          |          |
|---------------------------------------------------------------------------|------------|-----------|----------|----------|----------|
| Relative Value Of Farmland (From Part V)                                  | 100        | 49        | 0        | 0        | 0        |
| Total Corridor Assessment (From Part VI above or a local site assessment) | 160        | 40        | 0        | 0        | 0        |
| <b>TOTAL POINTS (Total of above 2 lines)</b>                              | <b>260</b> | <b>89</b> | <b>0</b> | <b>0</b> | <b>0</b> |

|                                   |                                                                       |                                          |                                                                                                             |
|-----------------------------------|-----------------------------------------------------------------------|------------------------------------------|-------------------------------------------------------------------------------------------------------------|
| 1. Corridor Selected:<br><b>A</b> | 2. Total Acres of Farmlands to be Converted by Project:<br><b>288</b> | 3. Date Of Selection:<br><b>12/16/24</b> | 4. Was A Local Site Assessment Used?<br>YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> |
|-----------------------------------|-----------------------------------------------------------------------|------------------------------------------|-------------------------------------------------------------------------------------------------------------|

5. Reason For Selection:

**Overall score for Corridor A within Oswego County is 89, indicating it did not approach the score that would require consideration of alternative corridors.**

Signature of Person Completing this Part: David Frenkel DATE: **1/8/25**

NOTE: Complete a form for each segment with more than one Alternate Corridor

## CORRIDOR - TYPE SITE ASSESSMENT CRITERIA

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December 5, 2024

Gwen Sivirichi, Senior Technical Director  
AKRF  
7250 Parkway Drive  
Suite 210  
Hanover, MD 21076

**RE: NRCS FPPA Review – Micron Clay Fab Facility, Onondaga and Oswego Counties, NY**

Ms. Sivirichi,

The Natural Resources Conservation Service (NRCS) under Part 523 of the Farmland Protection Policy Act (FPPA) has reviewed the proposed project described above. This review was conducted with respect to the effect(s) that the proposal may have on prime, statewide, and/or unique farmland. The project has several components within the overall design, some of which are limited to linear utility corridors. As such, the project is being reviewed with two separate forms. The following listed components have been submitted as part of the project with specific descriptions, extent, and areas of impact provided:

1. Micron Campus
2. Childcare Site
3. Rail Spur
4. Clay Substation Expansion
5. Oak Orchard WWTP
6. Existing Raw Water Pump Station
7. OCWA Terminal Campus
8. OCWA Burt Point Property
9. OCWA Lake Ontario Water Treatment Plant
10. Gas Regulator Station
11. Natural Gas Line
12. Fiberoptic Line
13. OCWA Line
14. Industrial Wastewater Conveyance

Project components 11 through 14 (as listed above) are associated with linear utility installations and were evaluated with the Farmland Conversion Impact Rating For Corridor Type Projects (NRCS-CPA-106). As the proposed OCWA line (component 13) crosses from Onondaga into Oswego counties, two separate NRCS-CPA-106 forms were used to capture county level land evaluation information. The remaining project areas (1 through 10 in the list above) were evaluated using a single Farmland Conversion Impact Rating form (AD-1006) as most proposed actions will take place within Onondaga County. Those non-corridor related activities occurring within Oswego County as currently proposed fall under existing exemptions and are not subject to FPPA provisions.

Several listed project components as proposed in part or as a whole would be exempt from FPPA provisions for several reasons. Subpart B of Part 523 of the Farmland Protection Policy Act states that ‘Lands identified as “urbanized area” (UA) on the Census Bureau maps’ are not covered by the act. The OCWA Terminal Campus, and OCWA Burt Point Property (components 7 and 8 on the above list)

1 | Page



extents as currently proposed and presented are entirely within UA on the 2020 Census Bureau Reference Maps and would therefore be exempt from FPPA provisions. In addition, portions of components 1 and 13 are also located within UA areas as proposed, and those acreages were not included within the AD-1006 or NRCS-CPA-106 evaluations. Other areas of components 3, 5, 9, and 10 that are part of the project were described as either already converted (i.e., currently paved, standing buildings, etc.) or fall outside the area of proposed disturbance. Additionally, project area 9, the OCWA Lake Ontario Water Treatment Plant improvements proposed are located within an area not mapped as prime, unique, or farmland of statewide importance, and/or are already converted, therefore would not fall under the FPPA provisions. If the scope of the project changes, then further review for FPPA might be needed.

FPPA provisions outlined in 440-V-CPM Amendment 12 Part 523.11 C, describes if construction is within an existing right-of-way (ROW), the activity is not subject to provisions of FPPA. As currently proposed and provided, portions of components 11, 14, and all of 12 (Fiberoptic line) occur within existing road ROW's, and therefore those acreages would be exempt. Please note that Part 523.11 E, lists another exemption that might be applicable for corridor portions of the project. FPPA provisions lists corridor subsurface project (such as buried water, sewage, and/or electrical lines) exempt if the proposal includes development of a soil disturbance/removal and reconstruction plan (as defined in 30 CFR823.12 and 30 CFR823.14) for all agricultural land uses. If a project area is currently in cropland, as defined by USDA-NRCS, 30 CFR823.15 applies, and a soil disturbance/removal and reconstruction plan will be developed for the exemption to apply.

For areas of the project proposal that do not fall under an existing exemption, and will impact prime farmland soils, or farmland soils of statewide importance, the enclosed AD-1006 and NRCS-CPA-106 forms need to be completed to rate the land being converted. If the Total Points in part VII (Relative Value from Part V plus the Total Site Assessment from Part VI) is greater than or equal to 160 (on either form AD-1006 or NRCS-CPA-106), an alternative site or adjustment to project extent should be considered that will limit impacts to prime farmland soils and soils of statewide importance. If no alternative for the project is practical, the Reason for Selection block at the bottom of the form should state the reasoning. Upon completion of Parts VI and VII of the forms provided, a copy is requested to be sent to the address below or e-mail to [daniel.ufnar@usda.gov](mailto:daniel.ufnar@usda.gov).

USDA/NRCS  
Daniel Ufnar  
441 S. Salina St  
Suite 354  
Syracuse, NY 13202

Thank you for this opportunity to review and comment on this proposal.

Respectfully,

Daniel Ufnar  
State Soil Scientist

Enc.

Natural Resources Conservation Service New York  
441 S. Salina Street, 5<sup>th</sup> Floor, Ste. 354, Syracuse, New York 13202  
Voice 315.477.6504 Fax 855-477-8518