Onondaga County Industrial Development Agency – 4/30/2026

STATE OF NEW YORK

TOWN OF CLAY

ONONDAGA COUNTY

INDUSTRIAL DEVELOPMENT AGENCY

(OCIDA)

In the Matter of the State Environmental Quality Review Act in Regards to Proposed Development of the White Pine Science & Technology Park, Location at the Southeast Corner of the Intersection of NYS Route 31 and Caughdenoy Road.

PUBLIC SCOPING HEARING

DATE: April 30, 2026

TIME: 6:03 p.m. to 8:00 p.m.

LOCATION: TOWN HALL OF CLAY
4401 N.Y.S. Route 31
Clay, New York 13041

BEFORE: ROBERT PETROVICH,
OCIDA EXECUTIVE DIRECTOR
ALEXIS RODRIGUEZ,
OCIDA SECRETARY

Reported by Kristen Lawler

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APPEARANCES:

FOR OCIDA:

BARCLAY DAMON, LLP

BY: JEFFREY DAVIS, ESQ.

125 East Jefferson

Syracuse, New York 13202

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(The hearing commenced at 6:03 p.m.)

MR. PETROVICH: Okay. Good evening, everyone. I'd like to call the scoping session public meeting to order -- public hearing to order. My name is Bob Petrovich. I am the Executive Director of the Onondaga County Industrial Development Agency or OCIDA.

There are obviously exits clearly marked for your safety, and also there are facilities in the lobby for -- just off the lobby for men's and women's rooms, if those are needed. I, along with OCIDA's legal counsel, Jeff Davis, and OCIDA's Secretary, Alexis Rodriguez, will be presiding over this evening's public scoping session as we commence the environmental review of the proposed development of the White Pine Science and Technology Park in Clay, New York.

This session is being simultaneously translated into American Sign Language. We are providing simultaneous Spanish translation. Please advise us if you need the translation so that the provider can provide you with a headset for this meeting.

MR. DAVIS: Excuse me, translator. Do

you want to say that, just in case?

(The translator recites the above in Spanish)

MR. PETROVICH: OCIDA proposes to develop the business park known as the White Pine Science and Technology Park located at the southwest corner of the intersection of New York State Route 31 and Caughdenoy Road. OCIDA currently owns approximately one hundred and four acres comprised of six tax parcels. The maps of the park are on display at the easels up at the front, and the Park will be capable of supporting a mix of industrial and commercial uses and may include industrial-related office, research, manufacturing, assembly, warehousing, data management, material processing and distribution facilities, including companies that could support the Micron semiconductor manufacturing facility.

The project may include utility improvements, including expansion of infrastructure both offsite and within the Park to support the project. The project may also include the acquisition of property through voluntary agreements or through condemnation under New York State Eminent

Domain Procedure Law. The project must be reviewed under the State Environmental Quality Review Act or SEQRA. In accordance with SEQRA, on September 14, OCIDA declared itself as the lead agency for SEQRA purposes. OCIDA also issued a positive declaration due to the project's potential to result in one or more significant adverse impacts and declared its intent to prepare a draft generic environmental impact statement or an E.I.S. for short.

The first step in preparing an E.I.S. is scoping. Scoping is a process that develops a written document, the scope, which outlines the topics and analyses of potential environmental impacts of an action that will be studied and addressed in the draft environmental impact statement prepared for this project. The purpose of scoping is to narrow issues and to ensure that the draft generic environmental impact statement will be a concise, accurate, complete document adequate for public review.

As part of OCIDA's determination that an E.I.S. was required, OCIDA noticed a draft scoping document and invited the public to review and comment on that scoping document. OCIDA posted a copy of the

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draft scoping document on its website for the public's review. Copies of the draft scope are available here in the room. I believe they're in the back. That handsome gentleman in the back has them if you would like a copy.

The purpose of tonight's scoping session is for OCIDA, as the lead agency in this process, to receive comments on the draft scoping document. Tonight is not a question-and-answer session, but an opportunity for the public to make their comments on the draft scoping document on the record.

There is a court reporter here tonight, seated over here, who is going to make a record of all comments made. If you do come forward and make comments tonight, we ask that you please state your full name and where you are from, and also speak clearly and slowly so that the reporter can make an accurate record of your statement. We are asking those in attendance to please show respect for the person that is speaking, even if you do not agree with the comment, and also to please hold applause or other noise so that we may make an accurate accounting and record of this event.

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OCIDA encourages the public to participate in this process. If you do not wish to make a comment here this evening, you may submit your comments in writing via email or the U.S. Mail to OCIDA. The contact information for submitting comments can be found on the notice, and we have copies of the notice available if you would like a copy. The notice and contact information for submitting comments can also be found on OCIDA's website. The contact information is also identified on the science of the tables -- on the sign-in tables here in the room. The written comments will be accepted through May 15, 2026. Your input, both verbal comments received here tonight as well as written comments that are received by OCIDA, will help OCIDA prepare a final scope, which will be released after all comments have been received and considered. Equal weight is given to both verbal and written comments.

At this point, I will turn the meeting over to Jeff Davis, and we'll begin taking comments on the record.

MR. DAVIS: Thank you. I'll call up by name those that have signed up so far to speak

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this evening, and if you'd come up to the podium one by one. At the moment, we have five people that have signed up -- six people that have signed up to speak, and so we're not going to have a time limit.

I'll -- I'll ask folks to speak as they would like to. If I feel as if they are getting repetitive or something going on, I may ask you to wrap up your comments so that those -- everyone that is registered can speak. And then if you'd like to come back up afterwards, recognizing that some people may have a time limit where they need to go before the meeting concludes this evening.

So with that, the first person that I have will be Shelly Hotaling, and after that will be Janet Rathburn.

MS. HOTALING: Shelly Hotaling. I'm concerned about the -- the water distribution that will come from this site. Now, I know that we're built -- we're bringing in a lot of tonnage for Micron, and we'll also have to bring in a lot of tonnage for this area. How many retention ponds will be put in? Because it's definitely going to affect the people's houses that are in front of it. If -- not all of them have ditches in front that even lead

all the way down.

If we're -- most of us are not on the sewer system, we’re on septics. And it's not fair to the residents to have to hook up to sewer. That should be part of the deal that's made with doing this because we're not going to be able to use our septic systems at all. And since this is a large partial, how many retention ponds do you feel that will be needed?

Now, I've worked in semiconductor heavy military for many years, and I know that with circuit boards and things like that, there are many chemicals. Now, is there going to be a safeguard for the chemicals that are going to be used by these industrial buildings? And how will it affect the people's quality of life that's near it?

Now, I see that you said on there that they could be doing some Eminent Domain. Now, right now we go over to a certain part, and then there's an additional ten acres that has not been bought yet. Now, are they planning on expanding this park more or less? And basically, the -- the output of noise and stuff, compliance that we'll have to deal with that's going to be right outside our bedroom doors. So

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that's --

MR. DAVIS: Shelly, can you -- I'm sorry. Could you just state your address?

MS. HOTALING: Yes. Eighty-four forty-four --MR. DAVIS: Eighty-four forty-four --

MS. HOTALING: -- Caughdenoy Road.

MR. DAVIS: -- Caughdenoy. Thank you. Great. Janet Rathburn. And after Janet, next is Paul Doody.

MS. RATHBURN: I live off of Henry Clay Boulevard across from the industrial park that's been there for years. The problem that we've had in the past is that they've always wanted to put intense uses over the industrial park, and there's really no buffer between the industrial park and the existing homes that are over on the other side of Henry Clay Boulevard. We've had a concrete batch plant want to go in there. We had a trash transfer station twenty-five years ago, whatever it was.

What I'd like to see happen with this is -- I know you want to put industrial uses there, but I feel what they should look into doing is doing some kind of step-down or split zoning where you put the more intense uses up by Route 31 and put the less

intense uses towards the back of the property where it abuts the neighbors. When I bought my property, the industrial zone was already there. The people that live back further from this area, they were there before you wanted to make this industrial, so I feel you need to protect them.

MR. DAVIS: Paul? And then after Paul is Ralph Turner.

MR. DOODY: All right. Thank you for the opportunity to provide some comments. My name is Paul Doody. I reside at 3308 Misty Cove Circle in Baldwinsville, Town of Lysander. I may provide some additional comments by the 15th of May, some more detailed comments. I just thought I'd throw a couple of general comments out this evening.

The first one is, I guess I'd ask you folks to provide a bit more community engagement when you do have the E.I.S available. And what I mean by that is be able to present the findings. I was quite disappointed that with the Micron E.I.S. for the main facility, there was no presentation, no information sessions to educate the public about what was in the document and be able to answer people's questions. So I guess I'd respectfully ask you guys to do that

this time for the science and technology park.

Second general comment is, this general E.I.S. presents some kind of unique challenges in that you don't know what's going to be on this property. You've got some renderings here of potential buildings, but you really don't know who's going to be there, what they're going to be doing, and I understand you need to be able to prepare an E.I.S., so you're going to have to make some assumptions on things. And I would ask that you look at it from a conservative standpoint so you don't end up, after developing this E.I.S., have some industry come in or some tenant come in that's creating more impacts than you would assumed in the E.I.S. and then have to go through a whole supplemental process, which I could see that delaying the acceptance of that -- that new tenant.

So I'd encourage you to look at conservative assumptions on what may be used here. I suspect that Micron probably knows the types of entities that -- that -- that would be attracted to this particular park to support their operations. So I guess that's what I would ask, is to be conservative with that and don't be optimistic, and

then down the road have to pay the price with delays in -- in tenancy.

My last general comment. See, good thing I did have notes here. The other thing is, given the fact that this is so directly associated with Micron, I'd ask that you look at these impacts as cumulative impacts, along with what you presented in the final E.I.S for Micron. I think it's important to look at that, particularly with the proximity. It's directly related to Micron, and the community here is going to feel those impacts on a cumulative basis. So that's it. I appreciate the opportunity to provide some comments.

MR. DAVIS: Thank you. Next is Ralph Turner, and after that is Cody Kelly.

MR. TURNER: Good evening. Thank you, team, for giving me the opportunity to speak. My comments would also be general in terms of the scoping. I would like to speak to the displacement of people or residents that -- and displacement of the land and the results that that may bring. I would ask that the -- the report in the E.I.S. would speak to the consideration of accountability for any environmental problems. For example, impactful

concerns coming from this type of development that may cause, for example, disturbance of compound chemicals that may be dangerous or perhaps affect the land or the -- the air and, thus, the people around.

And also I would ask that the E.I.S. would address accountability of some of these supportive contractors or businesses or agencies, whatever they would be, as well as Micron itself. And to look for applications where Micron and its indirect supporters could be more instrumental in -- in addressing concerns, especially where it concerns any chemicals or things of that nature. Thank you.

MR. DAVIS: Thank you. Next, Cody Kelly. After that is Baxter Hannox (phonetic).

MR. KELLY: Good evening. My name is Cody Kelly. I am the County Legislator for the 14th District, including the Science and Technology Park. I reside at 5 Sherwood Circle in Clay. Before I go on with my own comments, I'd like to build off some of the other things that I've heard tonight, namely something that I've stated on the record in the past with regards to this project that I personally do not want to see the use of Eminent Domain and hope that that can be avoided going forward.

I've spoken a lot about the economic opportunity sitting in front of us. I know that OCIDA is working to maximize that opportunity with additional supply-chain investments at this site and elsewhere. I'd like you to keep in mind throughout the environmental review, there are a lot of people living nearby between Country Meadows and Coachman's Crossing, where I grew up. These people deserve to know that every step is being taken to ensure that we are protecting our air, protecting our water, protecting our soil, limiting light and noise pollution, mitigating traffic issues, and more. I encourage OCIDA to leave no stone unturned to ensure those questions are answered to the satisfaction of myself and my constituents. Thank you.

MR. DAVIS: Thank you. Baxter Hannox.

MR. HANKIN: Hi, I'm Baxter Hankin.

MR. DAVIS: Sorry, Baxter.

MR. HANKIN: No worries.

MR. DAVIS: H-A-N-K-I-N. Sorry.

MR. HANKIN. You're all good. So I -- I'm an architect, and when I look at the plan for the layout of the site, that's where my concerns are, personally. I know that, you know, with Micron

right across the street, there's going to be a bus running to Micron in this area. And this site, as it's shown in the drawing here, is not laid out in a way that would enable people to walk between the buildings or from the buildings on this site across the street to Micron, which would reduce the usefulness of that bus stop and bus route, reducing access to employment for those using the bus, unless the layout of the site is -- is changed.

And furthermore, reorganizing the site to sort of have these different buildings and Micron all sort of being able to have people who work there walk between the different locations, can sort of spur a greater mixing of people who are working at these different spots, increasing interactions, collaboration, and innovation. And beyond all of that, you know, when we set up the site -- if we set up the site for more walking locally, as well as greater bus access, we reduce the number of cars on the road, and that can significantly help with traffic in the area for people who work and live here. Thanks.

MR. DAVIS: Thank you. That is the last of people that signed up. So first, if anybody

that would like to speak that has not spoken, and -- look, we're here until eight o'clock, so you don't need to run up here all at once, but if there's anybody that does want to speak that hasn't spoken, feel free to come up. If there's anybody that has already spoken and wants to take a second shot, also welcome to come up. And -- but we could have people that come in at seven o'clock, and so if people are done speaking, we'll also just kind of hit pause for a little bit and see if anybody else wants to arrive that may want to have an opportunity to put their comments on the record. So I'll open the room up to anybody that would like to speak that has not.

Okay. Is there anybody that wants to come back up and speak that has already spoken? Sure. Let me go back to my cards. Shelly.

MS. HOTALING: Yeah. One thing I forgot to add is, I've talked to a few of my neighbors and they're all concerned that they're kind of left in the dark. I would hope that, OCIDA, if you do plan on coming down and buying more property, that you notify the people that are there, because it's a big concern. That's something that's life-changing for many of us that have been there

thirty-plus years. So if there's any way possible that you could inform us or have some type of direct impact statement. Thank you.

MR. DAVIS: Okay. Is there anyone else at this time? Okay. It is six twenty-five. I'm going to pause. Okay? Meaning, I'm not going to talk anymore. If anybody else decides that they want to come up, raise your hand and let us know, and we'll let the stenographer know and everyone else know that they kind of go back into work mode. But otherwise, we will be here until eight o'clock, and if other people arrive, we'll give them an opportunity to speak. Thank you.

(The hearing concluded at 8:00 p.m.)

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STATE OF NEW YORK

I, KRISTEN LAWLER, do hereby certify that the foregoing was reported by me, in the cause, at the time and place, as stated in the caption hereto, at Page 1 hereof; that the foregoing typewritten transcription, consisting of pages number 1 to 18, inclusive, is a true record prepared by Associated Reporters Int'l., Inc. from materials provided by me.

IN WITNESS WHEREOF, I have hereunto subscribed my name, this the 20th day of May, 2026.

KRISTEN LAWLER, Reporter

From: Kukko, Melanie D (DEC) <melanie.kukko@dec.ny.gov>
Sent: Friday, May 15, 2026 3:51:19 PM (UTC-05:00) Eastern Time (US & Canada)
To: ED-WPSTP <WPSTP@ongov.net>
Cc: Glance, Dereth B (DEC) <Dereth.Glance@dec.ny.gov>; Balduzzi, Kevin M (DEC) <kevin.balduzzi@dec.ny.gov>; Foster, Patrick E (DEC) <patrick.foster@dec.ny.gov>; Vigneault, Thomas M (DEC) <thomas.vigneault@dec.ny.gov>
Subject: DEC Draft Scope Response - White Pine Science & Technology Park - DEC ID#: 7-3124-00616

Good afternoon.

Attached, please find DEC's Draft Scope Response letter for the subject line project. A paper copy will not be provided at this time.

Please reach out to me with any questions or concerns regarding this document at (315) 426-7482.

Best regards,

Melanie Kukko
Environmental Analyst, Division of Environmental Permits

New York State Department of Environmental Conservation
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NEW YORK STATE | Department of Environmental Conservation

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KATHY HOCHUL
Governor

AMANDA LEFTON
Commissioner

May 15, 2026

Onondaga County Industrial Development Agency
Attn: Robert Petrovich, Deputy County Executive
355 Montgomery St, Floor 2M
Syracuse, New York 13202

RE: White Pine Science & Technology Park
SEQR Draft Scoping Document Comments
Town of Clay, Onondaga County

Dear Mr. Petrovich:

The New York State Department of Environmental Conservation (DEC) reviewed the "Draft SEQRA Scope of Work" and Full Environmental Assessment Form (EAF) documents, received on April 13, 2026, associated with the State Environmental Quality Review (SEQR) for the proposed White Pine Science and Technology Park (Proposed Project) in the Town of Clay, Onondaga County. Based on current information, DEC's potential jurisdiction(s) under the Environmental Conservation Law (ECL) are listed in Attachment A. Please note that DEC may identify additional jurisdictions as information becomes available and specific park tenants are identified.

DEC offers the following comments on the draft scope for consideration in the preparation of the final scope for the Draft Generic Environmental Impact Statement (DGEIS).

Project Alternatives

1. Please include a discussion of potential alternatives and mitigation that could reduce energy and fuel demands during construction and the long-term operation of the Proposed Project, including renewable energy sources.

2. The alternative project layouts should be designed to maximize natural resource impact avoidance to the greatest extent practicable.

Water Resources (Sections 3.3 and 4.3)

1. (3.3) The DGEIS should describe the requirement that wetland boundaries must be delineated precisely and confirmed by DEC and the U.S. Army Corps of Engineers. Delineation maps and shapefiles should be included in the DGEIS to the extent they are available. The DGEIS should state that a request for a jurisdictional determination must be submitted to the DEC and all applicable ECL Article 24, Article 15 permits and the necessary Water Quality Certificates should be applied for and obtained prior to work commencing.

2. (4.3) The DGEIS should include consideration of stormwater runoff (construction and industrial) and water quality. This section should identify the current requirements of NYSDEC's State Pollutant Discharge Elimination System (SPDES) Permit, including the Construction General Permit (GP-0-25-001) and Multi-Sector General Permit (GP-0-23-001). The Stormwater Pollution Prevention Plan (SWPPP) needs to address hydraulic changes pre- and post-construction, all changes to hydrology from filling in any wetlands, streams, and drainageways on site, best management practices, and all changes to avoid, minimize, and mitigate adverse effects. Sufficient information should be developed to identify the approximate size and location of necessary stormwater management measures and outfalls during and after construction. When sizing stormwater management measures, there should be consideration if an Article 15 Dam Safety Construction Permit is required.

3. (4.3) When considering an overall approach to stormwater management at the site, the DGEIS should pay particular attention to Chapter 3 of the NYS Stormwater Management Design Manual (SMDM). This chapter focuses 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.

4. (4.3) It is important to note while DEC Region 7 Division of Water and Town of Clay will jointly evaluate the required SWPPP prepared by the applicant, the SWPPP will require the Town of Clay's approval per the MS4 General Permit (GP-0-24-001). The MS4 Acceptance Form signed by the Town of Clay must be submitted with the Notice of Intent to gain coverage under the SPDES Construction General Permit.

5. (4.3) Given the size of the project, large stormwater management practices may be required. The DGEIS should discuss the potential need to obtain a dam safety permit if stormwater impoundments exceed dam safety permit thresholds contained in ECL 15-0503. A dam safety permit is required to construct an impoundment, unless the structure satisfies one of the following exemption criteria: maximum of 6ft or less, and maximum impounding capacity is one million gallons or less; maximum height is between 6 feet and 15 feet and maximum impounding capacity is less than three million gallons.

Wetlands and Streams

6. (3.7) To the extent available, all DGEIS conceptual project plans should have confirmed wetland boundaries and regulated adjacent areas shown along with potential impact tables for each wetland by cover type, identifying potential permanent and temporary impact areas. Each individual wetland will have unique identification, such as a numbering system. The DGEIS should include a table summarizing the amounts and types of wetlands, streams, and other waterbodies on the Proposed Project site.

7. (4.3) Impacts to be evaluated include surface water volume and flow regimes, including streams, drainageways and ground water elevations before, during and after construction of the facility including connected actions such as all utility upgrades and connections. Stream flow impacts to Shaver Creek (NYS Water Index #: ONT-66-11-12, Class C), downstream from the site should be considered along with hydrologic and biological impacts to stream connectivity. The DGEIS should consider flood impacts on and off site due to expected wetland function losses and disruption of natural drainage patterns including flow paths for intermittent and ephemeral streams and other drainages along with hydrologic impacts to wetlands remaining on site which are dependent on these sources.

8. (4.3) The DGEIS should demonstrate avoidance of impacts to regulated resources from the project, including describing methods used to prevent hydrologic impacts to wetlands and streams remaining on site after project completion and monitoring protocols for those wetlands and streams.

9. (4.3) To the extent it is available, the DGEIS should consider onsite wetland mitigation for permanent unavoidable wetland losses. Onsite and offsite wetland mitigation plans should consider the details contained in Attachment B.

Biological Resources (Sections 3.4 and 4.4)

1. (3.4) 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. Additionally, the DGEIS should discuss the impacts on the species associated with converting these habitats to an industrial site. Mitigation could include the consideration of connective habitat corridors.

2. (3.4) Given the aquatic habitat that may be on site, the DGEIS should include an evaluation of marsh bird habitat, which may include a marsh bird survey. In the event state listed threatened or endangered breeding marsh birds are found onsite, work should be restricted to the non-breeding season (September-March) and loss of habitat mitigated at a 2:1 ratio of new to impacted habitat. Habitat creation, restoration, or preservation are optional methods of mitigation.

3. (4.4) To avoid adverse impacts to the state and federal listed endangered Indiana Bat, any project plans for construction activities on these parcels must specify that cutting of any and all known roost trees be avoided and clearing of other trees must occur from October 31 through March 31. If these steps are taken, the project will likely avoid any suitable habitat for this species, and an Incidental Take of an Endangered or Threatened Species Permit (6 NYCRR Part 182) will not be required from DEC. The DGEIS should discuss coordination with the US Fish and Wildlife Service regarding federal requirements.

Historic and Cultural Resources (Sections 3.5 and 4.5)

1. (3.5) Part 1 and 2 of the EAF, Appendix A of the White Pine Science and Technology Park SEQR Resolution, incorrectly assesses cultural resources. Approximately half of the project area is shaded archaeologically sensitive in Cultural Resources Information System mapping.

2. (3.5) The DGEIS should describe previously known cultural resources and archaeological sensitivity within the project area and reflect the results of new cultural resources surveys to assess previously unidentified aboveground and archaeological resources within the project site and ¼ mile study area. Without final project details, it may not be possible to develop a complete assessment of impacts on cultural resources in consultation with NYS OPRHP. If potential adverse impacts are identified, the DGEIS should consider the feasibility of avoiding impacts through design in addition to assessing alternatives for mitigation.

3. (4.5) It is appropriate to consult with Indigenous Nations regarding cultural and environmental resources. The project site is within the Onondaga Nation's area of interest, and near areas of interest for the Oneida Indian Nation, Tuscarora Nation, and Stockbridge-Munsee Community. Depending on the results of the Phase IA survey, the Nations may desire cultural monitoring during archaeological surveys and/or construction.

Air Quality (Sections 3.6 and 4.6)

1. (3.6) In addition to the approved Micron facility, emissions from the Rail Spur facility located on Caughdenoy Road should also be considered when discussing existing sources of air emissions in the study area.

2. (4.6) Potential impacts from potential mobile sources should also include any potential impacts from increased vehicular traffic which may be expected to occur as a result of the Proposed Project.

3. (4.6) When discussing potential ambient air impacts caused by air emissions generated by Park tenants, the DGEIS should identify and discuss potential impacts to sensitive receptors in the study area.

4. (4.6) The DGEIS should consider and discuss any potential air permitting which may be required for the various industries to be established by the Proposed Project. DEC requires air pollution control permits and registrations, under 6 NYCRR Part 201, for certain operations that release air pollution. Applications for air permits or registrations must include information on the facility's emissions, the operating processes at the facility, the raw materials being used, the height and location of stacks or vents, the applicable sections of the regulations that apply to the facility, and the controls being applied. Any necessary air permits and/or registrations must be obtained before construction begins.

Greenhouse Gas Emissions, Climate Change, and Climate Resiliency

Greenhouse Gas Emissions (Sections 3.7 and 4.7)

1. (4.7) DEC recommends the DGEIS evaluate and quantify estimated greenhouse gas (GHG) emissions that will result from construction and operation of the Proposed Project, including, but not limited to, estimated direct and upstream emissions, mobile emissions, and any emissions from wetland conversion. A conservative best estimate should be made given as end uses are unknown.

2. (4.7) Along with NYSDEC permits, other state agency decisions may require compliance with CLCPA Section 7 and, therefore, may require a CLCPA analysis, and should be referenced in the DGEIS, as appropriate.

3. (4.7) The ½ mile study area should not be relevant to GHG emissions and instead, emissions from the Proposed Project should be analyzed.

4. (4.7) If the Proposed Project will result in an actual or potential increase in GHG emissions, including both direct and indirect GHG emissions, the DGEIS should include a discussion of potential justification for the 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. DEC offers the following details and illustrative examples regarding potential alternatives and mitigation measures the DGEIS could consider:

    a. Given the large site footprint, the facility should explore geothermal heating and cooling. Further details about the Proposed Projects operating profiles (MW) and the annual heating/cooling loads (MWh) would help determine the balance of heating and cooling and how much of the thermal process loads could be efficiently supported by a ground loop heat exchanger (geothermal). This would require information about the size of the facilities, including its thermal load profiles, peak loads, and annual loads.
    b. Installation of solar arrays to provide power directly to the facility and minimize energy demands for facility operation.
    c. Assessment of mobile source emissions consistent with guidance from the New York State Department of Transportation (NYSDOT).
    d. Use of electric powered alternatives wherever fossil fuels are typically utilized.
    e. Include infrastructure supporting mass transit in the design and planning for such transportation.

5. (4.7) Energy efficiency goals are not in and of themselves sufficient mitigation as they are aspirational.

Climate Resiliency

1. (3.7) This section of the DGEIS should include a detailed description of historical observations and future projections of climate change hazards relevant to the Project site. Climate data projections for the expected useful lifespan of the Project site should be referenced. Information on observed and projected climate change hazards can be obtained from current local and regional land use plans, Onondaga County Hazard Mitigation Plan, local Climate Change Adaptation and Resilience Plans, the New York State Climate Impacts Assessment (https://nysclimateimpacts.org/), and other local and statewide studies of climate change hazards and impacts. Observed and projected climate change hazards relevant to the Project site include, but may not be limited to,

    a. increased frequency of flooding and greater annual average rainfall volumes*;*
    b. increased frequency and intensity of extreme precipitation events, including lake effect snow events;
    c. impacts on water resources under future conditions including drought;
    d. increased average annual temperature; and
    e. increased frequency and duration of heatwaves

2. (3.7) The DGEIS should include cross references to Project site condition descriptions included in other sections that may have relevance to the current and future climate conditions (e.g., Project location with respect to floodplains, drainage patterns, and receiving waterbodies described in sub-section 3.3 “Water Resources).

3. (4.7) The DGEIS should discuss how future physical risk due to climate change will be considered and resiliency measures, where necessary, will be developed. Analysis of future physical climate risk may be required pursuant to the Community Risk and Resiliency Act (CRRA) for permits for major projects in programs regulated by the Uniform Procedures Act (ECL Article 70). The DGEIS should consider and discuss both the potential for future physical risk from climate change hazards on the Proposed Project, as well as the potential for future physical risk from climate change hazards to surrounding communities resulting from the Project (e.g., through the displacement of risks) to the greatest extent practicable and including, but not limited to,

    a. consideration of physical risk due to climate change and associated impacts on the Project (e.g., future flood risk) and all supporting infrastructure, projected over the duration of the expected service life.
    b. analysis of the potential displacement, shift, or exacerbation of risks to and impacts on surrounding communities resulting from the Project and related activities; and
    c. assessment of potential measures to reduce risk, especially where the Project results in increased or shifted risk to surrounding communities; and specific consideration of individual components of the Project that relate to critical infrastructure or have increased potential for impacts on human health or wellbeing or natural resources.

4. (4.7) DEC has issued guidance documents to support applicants in consideration of certain climate risks, including the New York State Flood Risk Management Guidance. These guidance documents are available at https://dec.ny.gov/environmental-protection/climate-change/new-york-response/crra. The New York State Climate Impacts Assessment provides regionally downscaled climate change projections (https://nysclimateimpacts.org/wp-content/uploads/2024/01/Assessment-ch2-NYS-changing-climate-01-09-24.pdf) and a technical appendix (https://nysclimateimpacts.org/wp-content/uploads/2023/09/Climate-Methodology-Report-09-21-23-final.pdf) and should be consulted in the consideration of future physical risk from climate change hazards. Federal and State tools to assess risks related to extreme heat (heat.gov) are also available, including as referenced in DEC's "Extreme Heat in New York State" summary report on extreme heat impacts (https://dec.ny.gov/sites/default/files/2024-06/extremeheatsummaryimpactsreport.pdf).

Solid Waste, Hazardous Waste, and Hazardous Materials (Sections 3.8 and 4.8)

1. (4.8) Hazardous Waste - The DGEIS should include a discussion of hazardous waste, listed in 6 NYCRR Part 371.4, that the Proposed Project may generate. Details should include the 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 370-374.

2. (4.8) Solid Waste - The DGEIS should consider whether there is potential for population growth associated with this development and its impact on the management of solid waste and recyclables. Any potential change in the type or amount of waste and recyclable material generated by the Proposed Project should also be included. This section should consider the existing waste management network's capacity, and its ability to accept increased volumes associated with the Proposed Project. The need for new or expanded waste management facilities should also be considered in the DGEIS.

Utilities (Section 3.10 and 4.10)

Water Supply

1. (4.10) The DGEIS should provide adequate details on anticipated water demands and sources for obtaining water. A Water Withdrawal Permit and/or modification to an existing permit may be necessary from DEC for the Proposed Project depending on water demands and the source(s).

    a. New public water supply systems with the capacity to meet or exceed the 100,000 gpd threshold volume (6 NYCRR Part 601.2(v)) will need a Water Withdrawal Permit pursuant to 6 NYCRR 601 Regulations. This applies both to withdrawals from new sources of water and to increased withdrawals from existing sources. A water withdrawal permit is required for the extension of a "service area" of public water supply systems with a capacity that meets or exceeds the threshold volume. The entity that supplies the water would be responsible for the new or modified permit.

2. (4.10) The DGEIS should include an evaluation of alternative water sources and the reasoning followed to select the proposed sources of supply.

3. (4.10) The DGEIS should consider and include details and a summary of water conservation and reuse to mitigate water demands.

4. (4.10) The DGEIS should include a summary of any investigated and considered alternative water sources.

Wastewater Treatment

5. (3.10) The DGEIS should discuss coordination with Onondaga County Department of Water Environment Protection (OCDWEP) to determine whether its wastewater treatment facility can accept the expected additional flows and organic loadings from the Proposed Project. The Proposed Project will be required to obtain a Significant Industrial User (SIU) permit from WEP. Multiple SIU permits may be required depending upon the characteristics of the wastewater and the composition of industries discharging to OOWWTP. This process should be described in the DGEIS.

6. (4.10) As required in the Oak Orchard Wastewater Treatment Plant (OOWWTP) SPDES permit, if any of the proposed industries are categorical industries, or have the potential to materially change the nature of the discharge or increase the discharge of one or more substances authorized in the OOWWTP permit, the OOWWTP facility must adequately notify both U.S. Environmental Protection Agency (EPA) and DEC prior to acceptance of the waste. DEC would then review the information to determine whether a SPDES permit modification is necessary. If a permit modification is necessary, no discharge can be made to the facility before the modification is issued. This process should be described in the DGEIS.

7. (4.10) The DGEIS should include a discussion on the Proposed Project's potential wastewater loading, flow, and discuss the proposed on-site wastewater pretreatment technologies, if any.

8. (4.10) DGEIS should consider that DEC issues SPDES permits incorporating federal standards of performance under state law. NYS does not have an approved pretreatment program. EPA has regulatory jurisdiction of the industrial pretreatment program at OOWWTP. Local permits are issued to industrial users by WEP under EPA approved pretreatment programs.

Wastewater Conveyances (Section 4.10)

1. (4.10) The DGEIS should evaluate existing sewer systems and potential locations of any proposed sewer extension and consider to the extent practicable, potential hydraulic flows in gallons per day (gpd) and potential organic loadings in pounds per day (lb/d).

2. (4.10) The DGEIS should evaluate alternatives for the potential downstream routes for the sewer to OOWWTP, detailing all sewer diameters and theoretical capacities during peak flows.

3. (4.10) The DGEIS should indicate any proposed system design capacity and how the capacity was determined.

4. (4.10) The DGEIS should discuss that conveyance design plans and specifications will include details outlined in Attachment C.

Community Facilities, Open Space and Recreation (Sections 3.14 and 4.14)

1. (3.14) The DGEIS description of recreational resources should include the following DEC Wildlife Management Areas (WMA); Hamlin Marsh WMA, Cicero Swamp WMA, Three-Mile Bay WMA, Three Rivers WMA.

Cumulative Impacts (Section 5.0)

1. The DGEIS should consider the proximity of the Project site to the Micron Semiconductor Manufacturing Facility in discussions of cumulative, secondary, long-term and growth-inducing impacts of the Project, as the combination of land use changes at the Micron site and projected climate change hazards could intensify impacts on climate resiliency at the Project site and surrounding areas. The Micron Final Environmental Impacts Statement (https://ongoved.com/micronfeis2025/) should be reviewed and referenced in any sections of the DGEIS that discuss cumulative, secondary, long-term and growth-inducing impacts of the Project.

Impacts on the Use and Conservation of Energy (Section 6.0)

1. The DGEIS should contain a description of energy sources to be used during both construction and operational phases of a project, to the extent feasible. Anticipated levels of demand or consumption should be estimated as accurately as possible given available information. This should account for any energy intensive use. In addition, the DGEIS should discuss alternatives and mitigation that could reduce energy and fuel demands during construction and long-term operation.

Thank you for the opportunity to provide written comments on the DGEIS Scope for the White Pine Science & Technology Park proposal. DEC hopes that Onondaga County IDA will find the information helpful in the preparation of the DGEIS for the Proposed Project. If you have any questions on the information provided in this letter, you may contact me at (315) 426-7482 or email me at melanie.kukko@dec.ny.gov.

Sincerely,

Melanie Kukko

Melanie Kukko
Environmental Analyst
Division of Environmental Permits, Region 7

cc: Dereth Glance, DEC Regional Director, Region 7
Kevin Balduzzi, DEC Regional Permit Administrator, Region 7
Patrick Foster, DEC Deputy Commissioner for Sustainable Development, Central Office
Tom Vigneault, DEC Regional Engineer, Region 7

Encl. Attachment A: NYSDEC's Potential Jurisdictions Associated with White Pine Science & Technology Park
Attachment B: Wetland Mitigation Requirements
Attachment C: Wastewater Sewer Extension Information

Attachment A

NYSDEC's Potential Jurisdictions Associated with White Pine Science & Technology Park

- Water Quality Certifications (401 certifications), Section 401 of the Clean Water Act, U.S. Public Law 95-217, and 33 USC 1341 (see section 608.9[c] of this Title) (implemented by 6 NYCRR Part 608): for projects which impact federally regulated waters of the US require Federal approval under Section 404 of the Clean Water Act.
- Use and Protection of Water, ECL article 15, title 5 (implemented by 6 NYCRR Part 608)
- State Pollutant Discharge Elimination System (SPDES), ECL article 17 titles 7 and 8, (implemented by 6 NYCRR Part 750), General Permit for Stormwater Discharges from Construction Activities (GP-0-20-001) and Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (GP-0-23-001).
- Air Pollution Control, ECL article 19, (implemented by 6 NYCRR Parts 201 and 231): including construction and operation of a new emission source or a modification to an existing emission source of air contamination, and construction of indirect sources of air contamination.
- Endangered and Threatened Species of Fish and Wildlife; Species of Special Concern; Incidental Take Permits, ECL article 11, (implemented by 6 NYCRR Part 182) for the take of state-listed, endangered bird species occupied habitat.
- Water withdrawals, ECL article 15, title 15 (implemented by 6 NYCRR Parts 601 and 602).
- Freshwater Wetlands, ECL article 24, (implemented by 6 NYCRR Parts 662-663).
- Solid Waste Management, ECL article 27 title 7, (implemented by 6 NYCRR Part 360).
- Industrial Hazardous Waste Management, ECL article 27 title 9, (implemented by 6 NYCRR Part 373).
- Dam Safety, ECL article 15 title 5, (implemented by 6 NYCRR Part 608)

Attachment B
Wetland Mitigation Requirements

Mitigation proposals should be based on plans containing clear and specific details, short and long-term goals and measurable performance criteria. Wetland design must provide for persistence of the wetlands over time with the capacity to successfully adapt to changing conditions.

The plan must include but is not limited to:

- Acreage of proposed mitigation at the DEC-accepted, replacement ratios which may vary dependent on wetland cover types and lost functions and values.
- Location of mitigation site(s), including such information as site descriptions, topography, and proximity to DEC mapped Freshwater Wetlands. Mitigation sites should be located as close as possible to the impacted wetlands. Explore all possible locations within the Hydrologic Unit Code (HUC) 12 watershed areas first. After exhausting all potential mitigation sites near the impacted areas, the search may be expanded beyond the HUC 12.
- Analysis of lost functions and values (ECL § 24-0105) and how mitigation plans will compensate for these losses.
- A plan to create wetland hydrology at the mitigation site for each cover type, including water source, water budget and monitoring plan.
- The mitigation plan must provide for a proportional replacement for all cover types impacted by the project; forested, shrub/scrub, emergent marsh open water wetland and wet meadow with native wetland herbaceous and woody plant species
- A Planting Plan consisting of a site plan showing the locations of plantings/seedings, the source of plant materials, a species list, and performance criteria used to measure success. The Monitoring Plan must include a description of annual monitoring, the duration of which is dependent on the cover type must be described. For example, forested wetlands must be monitored for successful replacement for 15 years unless performance criteria are met sooner. Corrective actions, including re-planting, necessary site modifications to achieve sustainable hydrology and control of invasive species must be taken promptly until the mitigation goals are met. Annual monitoring reports will include observed percent coverage of the planned vegetation cover type, hydroperiod, percent coverage of invasive species, and an analysis of any deficiencies, along with corrective actions to achieve the goals of the mitigation plan.

Attachment C
White Pine Science & Technology Park Wastewater Sewer Extension Information

1. Conveyances
    - Confirmation from Onondaga County that its facility can accept the expected additional flows and organic loadings from the extension.
    - Location of the proposed sewer extension.
    - Expected hydraulic flows (gpd) and organic loadings (lb/d) in the proposed flow.
    - Design plans and specifications stamped and signed by a Professional Engineer licensed in the State of New York. Design plans must include plan and profile views of the proposed extension. These must be submitted in hardcopy.
    - Plan indicating the downstream routing of the sewer to the Oak Orchard WWTP detailing all sewer diameters, theoretical capacities and actual capacities during peak flows.
    - Design plans indicating lots served, property lines, existing and proposed streets (if applicable), storm drainage, existing and proposed utilities and easements, direction of flow, contour lines, placement of manholes, rim and invert elevations for pipes and type of pipe selected, and special construction (i.e. drop manholes, crossing of waterways).
    - Design capacity and how this capacity was determined.
    - Detailed drawings and specifications for manholes, pipe bedding and construction, leakage testing, deflection testing, notes indicating sewer and waterline separation distances.
2. Pump stations
    - Type of pump station (wet well/dry well); package or built-in-place; number and type of pumps chosen (submersible or suction lift).
    - Maximum flow expected and how this was calculated.
    - Provide pump curves and head calculations.
    - Accessibility of pump station for maintenance and protections for personnel, including ventilation.
    - Provisions which consider buoyance of the station and its structures.
    - Chemical storage and pumps (if applicable).
    - Detail of bar rack (if applicable).
    - Corrosion prevention considerations.
    - Location of all valves and control systems.
    - Provisions for alarm systems and emergency operation.
    - Bypass plan (if applicable).
    - Design plans (with requirements as noted above).
    - Design specifications covering all equipment and appurtenances, construction procedures, testing of piping and equipment

- Design plans and specifications stamped and signed by a Professional Engineer licensed in the State of New York. Design plans must include plan and profile views of the proposed extension. These must be submitted in hardcopy.

From: Brian Bender <bbender@townofclayny.gov>
Sent: Friday, May 15, 2026 8:47:49 AM (UTC-05:00) Eastern Time (US & Canada)
To: ED-WPSTP <WPSTP@ongov.net>
Subject: DGEIS Comments

Dear Members of the OCIDA Review Team,

Please find attached the Town's comments regarding the Draft Generic Environmental Impact Statement (DGEIS) for your review and consideration.

1. The Draft GEIS should include a comprehensive analysis of construction-related traffic impacts associated with both site development and supporting infrastructure improvements. Particular attention should be given to construction truck routing, worker traffic, intersection capacity, temporary road degradation, noise, dust, and impacts to nearby residential neighborhoods and local businesses. The document should further identify specific mitigation measures, including designated haul routes, traffic control plans, restricted construction hours, roadway maintenance obligations, and coordination with local emergency services, and clearly establish that such mitigation measures must be implemented prior to the commencement of construction activities to minimize disruption to the traveling public and surrounding community.

2. Given the scale of the proposed industrial development and its proximity to environmentally sensitive resources, the Draft GEIS should place significant emphasis on incorporating green infrastructure and sustainable site design practices throughout the planning and build-out of the Park. The Project should evaluate and prioritize the use of low-impact development techniques, including enhanced stormwater infiltration systems, bioswales, vegetated buffers, native landscaping, tree preservation, green space connectivity, and minimization of impervious surfaces to reduce long-term environmental degradation and preserve natural hydrologic functions.

3. The Draft GEIS should further evaluate opportunities to exceed minimum stormwater management requirements through implementation of resilient infrastructure practices that address long-term water quality, groundwater recharge, erosion prevention, and climate adaptation. Consideration should also be given to preserving existing wetlands, maintaining wildlife corridors where feasible, and integrating sustainable design elements that reduce heat island impacts and improve overall environmental performance of the site.

4. Because the Project is expected to be developed in phases and potentially by multiple tenants over time, the GEIS should establish clear performance standards and mitigation thresholds to ensure future site plan approvals remain consistent with the environmental assumptions and mitigation commitments identified during the SEQRA process.

Sincerely,

Brian P. Bender, ICMA-CM, AICP CEP, CFM
Commissioner of Planning
315.652.3800 Ext. 131
TOWN of CLAY
4401 State Route 31
Clay, NY 13041
Supervisor Damian M. Ulatowski

From: Baxter Hankin <bax.hankin@gmail.com>
Sent: Wednesday, May 6, 2026 12:16:20 AM (UTC-05:00) Eastern Time (US & Canada)
To: ED-WPSTP <WPSTP@ongov.net>
Subject: White Pine Science & Technology Park Public Comment

Hi,

I'm concerned about the design for the White Pines Science and Technology Park. The design of the site spreads out the buildings and doesn't prioritize pedestrian infrastructure. This is a problem for multiple reasons: poor bus service, increased traffic, stifled innovation & collaboration, lack of employee retention, quality of life for local residents, excess infrastructure costs, not maximizing developable land, and not being able to charge higher commercial rents.

1. **Bus service.** For effective bus service to Micron, the bus needs to also serve the White Pine Science & Technology Park, as well as the surrounding area. The currently proposed layout of the development creates long and indirect paths for people to walk between the science & technology park buildings and the entrance to the Micron campus. This prevents one or two shared bus stops without major detours from effectively serving the whole area, which is detrimental to the usefulness of this bus line for people who need to get to and from work here. With this current layout, fewer people will choose or be able to take the bus, or the bus route will have to be longer, windier, and less efficient.
2. **Traffic.** If the bus serves a smaller amount of people in this area, those people need to drive instead. If people can't walk between the different buildings in the business district, they have to drive instead. Since the same number of people take up less room on a bus than in cars, fewer people taking the bus will cause more traffic. Also, the current design creates bottlenecks with roads, funneling everyone onto the same collector roads to get in and out of work. A grid or grid-like network of streets can alleviate some traffic bottleneck concerns.
3. **Innovation and collaboration.** Close proximity between businesses, especially within walking distance from each other and with shared common destinations within a shared walkable radius, creates mixing of employees from different buildings. This cross-exposure is proven to foster collaboration and innovation, which would give our region an economic edge if these conditions were present in such an important tech employment hub. Common destinations could include a park, cafe(s), restaurant(s), and other spaces that people from different businesses at the area can meet at and cross paths at, all within walking distance. When the proximity between Micron

and the Science & Technology Park is direct adjacency, it would be a missed opportunity to not try to create as close a proximity as is possible.

4. **Employee retention.** Employees like to work in well-designed spaces. This includes pleasant places to go outside during a lunch break. This includes restaurants/cafes within walking distance, as well as a neighborhood park to sit at, and possibly walking trails through a larger green space. And, if people can walk a pleasant walk from where they live to where they work if they so choose - that's even better.
5. **Quality of life for local residents.** If this is designed just like any other suburban business park, it adds no value to the life of local residents. If it contains a central, pleasant mixed use area with restaurants to walk to, walking distance from the bus stop, and parks to sit at and walk around, these are amenities for the residents. If the grid of streets in this development ties into new streets of subdivisions and sidewalks in subdivisions that come later, that's even better: this business park, if mixed-use, can act as a town center that local residents can walk/bike/bus to for work, food, parks, etc. This can be a cultural and social hub for the area if well-designed.
6. **Excess infrastructure costs.** The current design has too much pavement per building, since the driveways, pipes, and wires must be long to accomodate for the buildings being so spread out. This will incur greater maintenance costs over time, too. It is better to have a compact layout to keep infrastructure upfront and maintenance costs low while still providing necessary amenities. More infrastructure is not always worse, but in the current design, the extra lengths of infrastructure provide no extra return on investment.
7. **Maximizing developable land.** If buildings are developed in a more compact layout, there's more usable land left over. This can be used to develop more office buildings, housing, parks, and more.
8. **Higher commercial rents.** Companies will likely be willing to pay higher rents to be in this business park if it is well-designed with benefits described above, and vacancy may be lower.

Here's a proposed alternative:
Red are pedestrian paths, green are park outlines (one small neighborhood park and one larger one with walking trails), yellow are roads, grey is parking, black are science & tech buildings (with small mixed-use retail/restuarant/cafe components facing the small park and main road), brown are mixed-use housing (big & small apartment buildings and townhomes with some other retail/restaurant and other spaces mixed in), blue is water, and the purple dot is a bus stop. This turns this development into a real town center, and begins planning for how it connects into future developments on adjacent properties. It creates a place that people can be proud of, rather than a forgettable business park that is a nuisance for anyone who doesn't work there. It can do all of the things listed in the ideal scenarios described above. Note that this is a rough draft sketch, so it is very approximate and is also missing a few walkways & driveways.

An example business park designed to create public spaces and walkability rather than being insular, and tying into surrounding street networks, **is the Walmart campus in Bentonville, AR**. See the article and images below. This is the way of the future when it comes to planning for hubs of employment and innovation:
https://www.cnu.org/publicsquare/2026/03/19/new-walmart-headquarters-embedded-urban-fabric

Please feel free to reach out to discuss or ask any questions. Thanks.

Regards,
Baxter Hankin
Architect & Community Organizer
Syracuse Resident

From: Sonia Kragh <sykragh@yahoo.com>
Sent: Friday, May 15, 2026 9:09:24 AM (UTC-05:00) Eastern Time (US & Canada)
To: ED-WPSTP <wpstp@ongov.net>
Subject: comments for White Pine Sciency and Technology Draft Scoping Plan

see attached pdf below. Thank you.

Sonia Kragh
sykragh@yahoo.com

Comments related to White Pine Science and Technology draft Scoping Plan

It is premature to have a scoping plan for generic environmental impact statement (GEIS) for industrial/commercial use of listed parcels before changing zoning designation from RA-100 residential/HC-1 Highway commercial. (Town of Clay needs to approve a zone change).

Onondaga County has identified a regional housing crisis even before Project Micron with its expected population increase. Why not use these RA-100 residential parcels for housing? Any housing development should not disturb sensitive habitat of species of concern or further affect disrupted wetlands and other surface waters and groundwater. The draft scoping plan mentions working around wetlands. The region desperately needs energy independence and these parcels might be perfect for solar arrays for the community and for Micron to fulfill its renewable energy pledge as part of the green chips act. Battery storage technology could be included. Remaining areas could be developed into parks to balance the industry in the region.

OCIDA is the project sponsor, has acquired the parcels from financial transactions and will have monetary gain with bringing in developers which pay OCIDA to have their projects reviewed. OCIDA should not be lead agency for SEQRA review as it is a conflict of interest. Section 4.1 of the document states local zoning has “various options for compliance” … use of eminent domain. This indicates premature closure of OCIDA to fairly consider alternative actions for the parcels.

This Scoping Plan is for a Generic Environmental Impact Statement. There is reference to 6 parcels and 10 buildings, and that full EIS may be needed depending on what development occurs. Why is this scope limiting this to a generic EIS? Will a full EIS occur for each parcel development? Neither the Full Environmental Assessment Form nor the draft scoping plan list details related to what the one or more significant adverse impacts on the environment may be, and possible mitigation and exploration of alternatives to avoid or reduce those impacts. It is difficult to provide meaningful review of the scoping document without any idea of what the environmental impacts and alternatives might be. The project description does list that the location of the 6 parcels was chosen for favorable access, topography, and avoidance of wetlands and environmentally sensitive features. Details are needed. A Generic Environmental Impact Statement was felt to “offer a reasonable prediction of anticipated development while preserving flexibility to accommodate various industrial uses, buildings, and facilities, scale of development and site design.” This sentence seemingly allows OCIDA to do anything it wants with the parcels using the findings of a GEIS, without considering new or different environmental harm concerns if “flexibility” results in changes in an as yet unknown site design.

“The DGEIS will also establish, to the extent practicable, impact thresholds beyond which additional environmental review will be pursued”. What does “to the extent practicable” mean?

Micron Project and connected actions are proceeding across the street from these parcels. Because of national security needs, the DEC approved permits for Air Quality and Water Quality that both demonstrate significant expected harm to the region. Adding any type of industrial development will only accentuate that harm. The public is only now becoming aware of the dire effects the chips

industry will have related to Green House Gas Emissions/Climate Change and Wastewater Management of emerging contaminants like PFAS which could pollute our freshwater drinking sources forever. Any SEQRA review boundaries need to include the Micron campus environmental harm to the region. This proposed new development does not “get a pass” for national security reasons.

It is unknown what impact the adjacent Micron demolition and construction and operations will have on this adjacent 104.4 acres under review. Projections of White Pine Science and Technology Impact evaluation in the GEIS needs to expand the zone of evaluation from ½ mile to 30 miles radius to capture potential impacts to water, air, wildlife, Greenhouse Gas Emissions , Solid Waste, hazardous waste, risk of chemical spills, transportation, noise, vibration, visual effects and community character. The radius of potential impact should be expanded to include the counties of Oswego and Onondaga at a minimum related to wastewater management both municipal and industrial, electricity demand and supply, fossil fuel demand and supply, other utility demand and supply, climate change and resiliency, flooding and drought, transportation, environmental justice and socioeconomic conditions. The effluent of wastewater to waters draining into Lake Ontario must not impact fresh drinking water supply.

Departments of transportation NYS and Onondaga County will need to provide infrastructure upgrades to an already changing and congested highway and surface road region with impact from Micron yet to be determined. What is the rush? Let this process settle and those living in the region offer suggestions for improvement before making the congestion worse. All highway corridors to Micron and this proposed project should be studied as well as projected commuting corridors. This will impact many communities North, South, East and West of the proposed project. Baseline and ongoing Air and Noise and Vibration monitoring should be undertaken.

The Project site is defined as any location where project facilities and infrastructure will or might be constructed, including the 104.4 acre parcel and adjoining routes, rights-of-way and “areas needed to support project related infrastructure and improvements”. More details are needed about these connected actions to set an appropriate radius of review for SEQRA.

Page 5 - 1.0 Introduction and Project Description - the entire content other than the outline is missing from the pdf availalbe to the public. This information needs to be provided and the public comment period extended to allow for review.

P6 - 2.0 Alternatives - Added should be using the parcels for residential rather than industrial development. Also for solar arrays and battery storage. Also for any other development that would support the towns of Clay and Cicero during the vast Micron construction and operation over decades. This could include establishing this as a recreational area to balance the industrial development.

P 6-10 3.0 Environmental Setting:
3.1 “analysis will also identify reasonably foreseeable development projects known or likely to be built within the time horizon of the Project in the study area” This includes Micron project and

connected actions as mentioned above, as well as harm from water and air pollution expected from that project. Any GEIS should have repeat study parameters as the Micron project progresses.
3.2 Geology, Soils and Topography
The geology of these parcels needs to be sound as the region is a karst area based on already mapped areas. This could impact water flow with potential for sink holes over time. Any chemical or industrial pollutants that land in groundwater could pollute communicating waters far and wide, including Oneida Lake and Lake Ontario. Any GEIS should have repeat study parameters as the Micron project progresses.
3.3 Water Resources - Micron is undertaking a vast construction that is disrupting surface waters and groundwater. It is impossible to project what the wetlands and floodplains and surface waters will look like as this construction takes place. Any GEIS should have repeat study parameters as the Micron project progresses.
3.4 Biological Resources - habitat to this parcel has changed since Micron development began and habitat for numerous animals and plants was disrupted. This assessment is particularly important with field studies and baseline and ongoing monitoring of "where have the bats gone" and effects to species of concern. Enjoying Biological resources and water are bread and butter to many in the region, and further disruption by industry and develpment risks literally killing outdoor recreation and careers.Any GEIS should have repeat study parameters as the Micron project progresses.
3.6 Air Quality - "existing sources of air emissions in the study area, due primarily to the adjacent appproved Micron Semiconducgtor Manufacturing Facility and vehicular traffic will be discussed". Based on the projected high GHGe and air pollution, any industrial development should be a non starter unless the developers have a solid commitment for renewable energy all sectors including construction materials, heat pump technology, thermal networking, battery storage and solar arrays, among others. Any GEIS should have repeat study parameters as the Micron project progresses.
3.7 Greeenhouse Gas Emissions, Climate Change and Climate Resiliency - This section should also include Climate Action Plans by the County of Onondaga and City of Syracuse and Towns of Clay and Cicero.. If they do not exist, then a path to developing them should be undertaken.
3.8 Solid Waste/Hazardous Waste and Materials - The current design build of the Oak Orchard Municipal and Industial Waste Water Treatment Plants are not sufficient to prevent emerging contaminants like PFAS from polluting Lake Ontario. Details of any toxic chemicals related to the proposed project must be revealed in the DGEIS in order for there to be appropriate review and comments. A GEIS is so vague, that these details will likely be missing in which case a full EIS would need to be repeated for any industrial project proposed. In addition, It is unclear if the IWWTP capacity and operations design could accept any other user besides Micron which is what is currently planned. Any GEIS should have repeat study parameters as the Micron project progresses.

3.9 Human health and Safety -potential but expected negative effects from Micron's use of emerging chemicals will be air and water borne. The GEIS should evaluate for effects from that location with full knowledge of the chemicals used by Micron. Baseline monitoring of wells and sump pumps as well as human bodies would be appropriate before adding in any other form of industry through this project. The county and state departments of health should be consulted. Any GEIS should have repeat study parameters as the Micron project progresses.

3.10-3.12 utilities, transportation, traffic, noise, vibration - see prior comments Any. GEIS should have repeat study parameters as the Micron project progresses.

3.15-3.16 - The Micron EIS did not adequately assess these impacts, as the scope of evaluation was too narrow. This is the time to get this right and have the GEIS assess impacts of harm as well as benefit to residents of Onondaga and Oswego Counties. Yes, this is a wide corridor, but that is the region impacted by co-existing industrial developments. Any GEIS should have repeat study parameters as the Micron project progresses.

P 10-18 Potential Environmental Impacts and Mitigation
P 11 "for purposes of defining study area to be assessed for each potential Project impact, the total area of the Park…is 104.4 acres. This…will be the minimum study area size for impact analysis. This is arbitrary and has nothing to do with what is happening within the as yet undefined parcels and what the use will be of these parcels. A full EIS with appropriate boundaries should be conducted for each parcel, since the site was identified as a Type I SEQRA action and Determination of Significance Part 2 of the FEAF found one or more adverse environmental impacts of the Project. (p. 3) . The study areas for 4.1-4.16 vary and there is no meaningful information provided to comment on if these study areas are adequate or not (see comments related to section 3 in terms of recommended study areas).

P 17 - 5.0 - Cumulative Impacts - there is no way to know the cumulative impacts without having more specifics related to development of each parcel or the site in its entirety. "This section will be based on a qualitative analysis of potential cumulative impacts and will only involve projects which have advanced to an appropriate level of detail to warrant consideration." As no details are provided, a full EIS will have to repeated to determine cumulative impacts. Any GEIS should have repeat study parameters as the Micron project progresses.

P. 17-18 - Impacts on the use and conservation of energy, growth inducing impact, unavoidable adverse impact. - as there is no meaningful information related to proposed developers and projects, this information will not have value in a GEIS and a full EIS will be needed when site development plans are known. Any GEIS should have repeat study parameters as the Micron project progresses.

In summary, there is inadequate information presented in this draft scoping plan to feel that a generic environmental impact statement will be helpful or valid.

The recommendation would be to postpone conducting a GEIS until the Town of Clay has approved or denied request for change in zoning and further details of site development plans are known. Otherwise, we are all wasting our time and another EIS for each development will need to be completed.

Sonia Y Kragh, MD
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From: Chris Herrmann <sirhc_warrior@yahoo.com>
Sent: Thursday, May 14, 2026 1:05:22 PM (UTC-05:00) Eastern Time (US & Canada)
To: ED-WPSTP
Subject: Attn: White Pine Science and Technology Park Project Comments on Designation Change and EIS

Firstly, beginning to draft an EIS for this development is extraordinarily premature; the BEST use of this land would be the housing that the town of Clay has stated is required/desired going forward.

Onondaga County is already suffering from a housing crisis, not inclusive of the Micron development. **This parcel is already zoned as residential** and Onondaga County is *already* losing wetland areas to the aforementioned development. Agencies have expressed frustration with existing wetland restrictions and building more housing. If the Micron development will be so environmentally responsible and clean, then living across the street - in a beautiful mixed-use development, with some conserved wetland areas and perhaps a small park - should be STRONGLY considered. Especially since that development would be in close proximity to OTHER already-existing housing developments and minimize commute traffic. Micron is expecting to hire workers, and traffic is already an issue in Clay, so additional housing close to the plant appears to be desirable and logical. It would also be the LEAST additional pollution that could be generated from a development of the White Plains parcel. Cumulative pollution in Clay needs to be a factor in any EIS proposition going forward.

Thank you for your time,

Christine Herrmann