

Final Scope for the Preparation of a Generic Environmental Impact Statement

**White Pine Science and Technology Park
Town of Clay, Onondaga County, New York**

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INTRODUCTION

This document is the Final Scope for the proposed Draft Generic Environmental Impact Statement (DGEIS) for the White Pine Science and Technology Park (Park) project. It was prepared pursuant to Title 6 of the New York Codes, Rules, and Regulations (NYCRR) Part 617.8 and provides: (1) a brief description of the proposed action; (2) a summary of the New York State Environmental Quality Review Act (SEQRA) process; (3) an identification of potentially significant adverse impacts from the full Environmental Assessment Form (FEAF) and consultation with Federal, State, and local agencies; (4) the extent and quality of information needed to adequately address each impact; (5) an initial identification of mitigation measures; and (6) the reasonable alternatives to be considered.

Project Description

Onondaga County Industrial Development Agency (OCIDA) as Project Sponsor proposes to undertake master-planning for the development of its White Pine Science and Technology Park property located in the southeastern corner of New York State Route 31 and Caughdenoy Road in the Town of Clay, County of Onondaga, New York. The Park is envisioned to accommodate a mix of industrial and commercial uses that may include office, research, manufacturing, assembly, data processing, warehousing, high-tech materials/equipment and distribution facilities, as well as tier one supply chain companies that could support the Micron Semiconductor Manufacturing Facility (located in the adjacent White Pine Commerce Park), in a campus environment at the approximately 104± acre Park property (Project). The Park is currently zoned as Residential/Agricultural (RA-100) and Highway Commercial (HC-1).

The Park is highly suitable for industrial and commercial uses due to its proximity to ample electric power at the National Grid Clay substation west of Caughdenoy Road and CSX rail access. The Park can be readily connected to nearby utilities, including water, sewer, electric, fiber optic, telephone, and natural gas.

Industrial and commercial facilities at the Park are proposed to be located in six development areas encompassing ten (10) proposed buildings. The proposed development areas would range from 8 to 25 acres. These development areas are considered the most suitable from a development perspective due to favorable access, topography and other considerations, including avoidance of wetlands and environmentally sensitive features. An application to the Town of Clay for rezoning to I-2 Industrial will be necessary to accommodate industrial and commercial uses at the Park.

The Project site will require additional infrastructure to support industrial and commercial development. Improvements along Caughdenoy Road and at the NYS Route 31/Caughdenoy Road intersection are necessary and will be determined in consultation with New York State Department of Transportation (DOT) and Onondaga County DOT. Separate from the Project, Onondaga County is undertaking an expansion of its Oak Orchard Wastewater Treatment Plant (OOWWTP) service territory and is currently constructing the new White Pine Pump Station at the southeast

corner of Route 31 and Caughdenoy Road. Sanitary sewer collection infrastructure will be needed within the Park to connect to the White Pine Pump Station to provide service to future tenants. Specific sewer infrastructure requirements for Park tenants will be determined in consultation with Onondaga County Department of Water Environment Protection (OCDWEP) and other stakeholder agencies. Additional electric and gas utility upgrades may also be required.

The “Project site” is defined as any location where project facilities and infrastructure will or might be constructed. This includes OCIDA’s 104± acre Park property and adjoining routes, rights-of-way and areas needed to support Project related infrastructure and improvements. “Off-site” is defined as any portion of the study area and areas of potential impacts not on or encompassed by the Project site.

Until a prospective tenant or tenants are known, it is assumed that the Park could be developed in several phases and by one or more industries. The full build-out scenario includes a conceptual site layout of buildings, parking, internal roadways, stormwater management areas and ancillary industrial and commercial facilities. The proposed development scenario at full build-out could accommodate a combined total of approximately 540,000 square feet (SF) of commercial/industrial space, additional supporting structures, with various building sizes and heights permissible under Town zoning to support specific development needs. For purposes of the Final Scope and subsequent Draft GEIS, it is assumed that the largest proposed building will be no higher than the predominant building structures at the White Pine Commerce Park located on Route 31.

These uses and sizes are assumed for the full buildout scenario for purposes of evaluation in the DGEIS.

Summary of the SEQRA Process

On March 5, 2026, OCIDA initiated the SEQRA process pursuant to 6 NYCRR Part 617 (New York Environmental Conservation Law §§8-0101 et seq.) by declaring its intent to serve as Lead Agency for purposes of coordinated review of the Project and declaring the Project to be a Type I action. Also on March 5, 2026, OCIDA circulated a notice of intent to serve as Lead Agency to involved agencies, along with the completed Part 1 of the FEAF. No objections to that notice were received during the 30-day period commencing on that date.

Lead Agency

As Lead Agency, OCIDA is responsible under SEQRA for conducting a coordinated environmental review of the Project among all Involved Agencies and for preparing a DGEIS. Subsequent to the DGEIS, a Final GEIS will be prepared followed by a SEQRA Findings Statement(s) from OCIDA and Involved Agencies. The Final GEIS and OCIDA’s Findings Statement will identify the conditions, criteria, or thresholds to guide future site-specific actions that may be undertaken.

Classification of Action

Based on the information contained in the complete FEAF, the Project is considered a Type I Action under SEQRA, primarily because the development of the Park and construction of infrastructure will cover a relatively large geographic area and exceed the ten-acre threshold for Type I actions.

Determination of Significance

As Lead Agency, OCIDA completed Part 2 of the FEAF. OCIDA found that one or more adverse environmental impacts of the Project may be significant. Therefore, on April 9, 2026, OCIDA prepared a positive declaration for the Project.

Public Comment Period and Community Meeting

The Draft Scope was available for agency and public review and comment.

The comment period for scoping extended from April 9, 2026 to May 15, 2026. During this period, OCIDA held a public scoping meeting on April 30, 2026 from 6:00 p.m. to 8:00 p.m. at the Town of Clay, Town Hall, 4401 NYS Route 31, Clay, NY, 13041, to obtain input from the public. The scoping meeting had simultaneous Spanish and American Sign Language interpretation and all members of the public that wished to speak were given the opportunity to do so.

OCIDA provided notice of availability of the Draft Scope and comment period and public scoping meeting in the Post Standard and on OCIDA's website. Notice was published in the Environmental Notice Bulletin.

Comments were accepted via:

- The public scoping meeting (in-person);
- Emailed comments to WPSTP@ongov.net; and
- Mail to OCIDA Attn: White Pine Science and Technology Park Project, Office of Economic Development, Onondaga County, 335 Montgomery Street, Floor 2M, Syracuse, NY 13202.

How Comments Were Used

At the end of the comment period on May 15, 2026, OCIDA collected, reviewed, and summarized the comments received and prepared this Final Scope. The comments received during the scoping period were considered by OCIDA to define the final scope of the DGEIS and inform the related technical analyses and environmental resources to be evaluated in the DGEIS.

Once approved, OCIDA will publicly notice and distribute the Final Scope. It will then be used to prepare the DGEIS.

Scoping Document for the DGEIS

This Final Scope identifies potential issues and anticipated impacts proposed to be addressed in the DGEIS to be prepared by OCIDA for the Project. One of the principal purposes of the scoping process is to have the Lead Agency (OCIDA), Involved Agencies and the public identify those impacts thought to be significant and, therefore, needing discussion and analysis in the DGEIS. Scoping can also identify topics that may be considered irrelevant or insignificant and not

necessary for inclusion in the DGEIS. This Final Scope has been prepared consistent with regulations implementing SEQRA.

The DGEIS is intended to determine whether the Project will cause any significant adverse environmental impacts and identify possible mitigation measures that will be implemented to avoid, minimize or reduce those impacts on the environment. Under SEQRA, a DGEIS can be prepared in place of a more conventional site-specific EIS when a proposed action is at a conceptual stage of development and timing or project design is uncertain, thus making the identification or extent of certain specific impacts impractical. A “generic” EIS is less specific than a conventional EIS and can be based on conceptual information until more detailed information on tenants, uses and design become known. The Generic EIS may present and analyze, in general terms, a few hypothetical scenarios that are likely to occur.

It is appropriate to conduct an environmental review of the Project as a Generic EIS because the Project’s development scenario offers a reasonable prediction of anticipated development while preserving flexibility to accommodate various industrial uses, buildings and facilities, scale of development and site design. It also allows OCIDA to evaluate the potential environmental impacts of full build out of the Park at the outset rather than on a project by project basis and, where available, consider expected details of anticipated future development of the Park.

The DGEIS will follow the same SEQRA procedures as a conventional EIS. Unlike a conventional EIS, the DGEIS may place greater emphasis on cumulative, secondary, long-term and growth-inducing impacts of the Project. The DGEIS will identify baseline environmental conditions that may be affected by the Project, for example, along the route of any utility infrastructure. The DGEIS will also establish, to the extent practicable, impact thresholds beyond which additional environmental review will be pursued.

For SEQRA purposes, this Final Scope and the DGEIS assume the maximum build-out potential for the Park as the basis for determining impacts and mitigation requirements. Future actions that fall within the range of impacts evaluated in the DGEIS are not expected to require further SEQRA review. By identifying baseline environmental conditions and impact thresholds, the GEIS process may facilitate development of the Project by allowing for quicker approval of future actions associated with development of the Park that are consistent with the GEIS and SEQRA Findings. Future actions that exceed impact thresholds will be addressed through a supplemental environmental review that focuses only on those impacts not adequately addressed in the original GEIS.

Anticipated Contents of the DGEIS

The DGEIS will discuss the Project in terms of a “Project site” and a “study area(s)”. The Project site will be those locations where Project facilities (e.g., buildings, roadways, utility lines) are to be located. The Project site will include the location of proposed sewer infrastructure and other project-related development supporting the Project. For SEQRA purposes, the study area(s)

encompasses the Project site and offsite areas where environmental impacts will be studied. Each resource area has a specific study area as detailed herein.

The DGEIS will be formatted consistent with the requirements of SEQRA and the New York State Department of Environmental Conservation (NYSDEC) regulations implementing SEQRA. It will contain a Cover Sheet, Table of Contents and an Executive Summary. Technical information will be summarized in several chapters utilizing tables, graphs and maps as appropriate. Technical studies and collected field data will be provided as appendices. Specifically, the DGEIS will include the following sections:

EXECUTIVE SUMMARY

The executive summary will provide a brief summary of the contents of the DGEIS, including, but not limited to, a brief description of the Project, the Project's purpose and need, alternatives to the Project, and a listing of potential significant adverse environmental impacts and proposed mitigation measures.

1.0 INTRODUCTION AND PROJECT DESCRIPTION

The primary purpose of the Project is to prepare the Park for commercial and industrial uses. The first section of the DGEIS will introduce the Project and why developing the Park is needed as a regional economic development initiative. This section will provide a detailed Project description and conceptual layout of the Park, citing various aspects of the Project that require environmental review. Involved and interested agencies that are part of the SEQRA review process will be identified. Each agency's role and possible permitting and approval authority will be discussed.

Section 1 will contain information outlined below supplemented with maps, plans and other graphics as appropriate:

- 1.1 Project Background
 - 1.1.1 Project Description
 - 1.1.2 Project Overview and History
 - 1.1.3 Project Purpose and Need
 - 1.1.4 Project Location and Setting
 - 1.1.5 Proposed Development
 - 1.1.6 Permitting and SEQRA Process
- 1.2 The SEQRA Process & Future SEQRA Actions
 - 1.2.1 State Environmental Quality Review Act
 - 1.2.2 Relevant Prior SEQRA Reviews
 - 1.2.3 Chronology of Current SEQRA Process

2.0 ALTERNATIVES

The DGEIS will describe the purpose and need for the Project and include a description and evaluation of a range of reasonable alternatives to the Project and how each meets the overall Project's purpose and need. Specifically, alternatives to be considered will include the "no action"

alternative, alternative uses (*e.g.*, residential or mixed-use residential) along with an evaluation of alternative Project layouts, or alternative Project scale/extent designed to maximize avoidance of natural resources in order to either reduce or eliminate potential impacts. Each alternative discussed will summarize both beneficial and adverse effects on the environment that may result from that alternative.

The DGEIS will not consider alternative site locations given that the Project is defined to include potential tier-one supply chain companies that could support the Micron Semiconductor Manufacturing Facility and which must be located within very close proximity to the semiconductor manufacturing facility.

Section 2 will follow the general outline below in addressing these topics:

- 2.1 Alternative 1: The No-Action Alternative
- 2.2 Alternative 2: Reduced Size Park
- 2.3 Alternative 3: Alternate Project Layouts
- 2.4 Alternative 4: Alternative Uses

3.0 ENVIRONMENTAL SETTING

Section 3, Environmental Setting, will include detailed discussions of existing or baseline environmental conditions in the Project site for the various topics being evaluated that are identified below. Existing conditions will be described in sufficient detail so that an accurate picture of current conditions can be compared to conditions anticipated to result in the future with or without the Project. This section will rely on available information sources and previous studies conducted by OCIDA and others, supplemented as appropriate by new data collection. Information will be supplemented with tables, graphs, photos and maps to illustrate existing conditions at the Project site and, where applicable, in the study areas. Citations for existing sources of information will be provided and all references will be identified. Information will be discussed according to the Section 3 outline below:

3.1 Land Use, Zoning and Public Policy

The DGEIS will assess the Project location in relation to existing land uses and community character for both the Project site and the adjacent properties. This analysis will also identify reasonably foreseeable development projects (projects known or likely to be built within the time horizon of the Project in the study area) based on information obtained from the Town of Clay and Onondaga County. Parcel-based GIS maps depicting various land use categories within approximately 1 mile of the Project site will be provided. Current Town of Clay zoning will be described. The Town's present zoning map will be provided. Bulk and land use regulations under relevant zoning districts will be described. This section will also summarize recent land use planning initiatives undertaken by the Town of Clay and Onondaga County as well by the Syracuse Metropolitan Transportation Council (SMTC). These initiatives may include the SMTC 2050 Long Range Transportation Plan, Onondaga County Comprehensive Plan, Onondaga County Sustainable Development Plan,

Onondaga County Climate Action Plan, Town of Clay Comprehensive Plan, and Town of Clay Northern Land Use Study. Any applicable initiatives will be summarized in terms of overall land use goals and objectives for the Project site and relevance to the Project. Discussion of state law with respect to eminent domain will also be provided.

3.2 Geology, Soils, and Topography

The geology, soils and topography section will discuss the natural surface and subsurface features present on the Project site. Much of this information will be obtained from documented sources including maps, reports and earlier subsurface exploration studies completed for the study area. Geology and soils information will be obtained from the Onondaga County Soil Survey, the United States Department of Agriculture's Natural Resources Conservation Service and any reported geotechnical studies previously conducted in the Project site. A survey map providing boundaries, spot elevations, contours and other pertinent site features, both natural and man-made, including adjacent utility locations will be included. The survey map is a basis for preparing alternative development scenarios.

3.3 Water Resources

The DGEIS will provide an assessment of surface water and groundwater resources within and adjacent to the Project site, including Project site field delineated wetlands and streams, along with their state and federal classifications and existing uses. Groundwater levels will also be informed from geotechnical investigations. Named streams and rivers within or adjacent to the Project site will be identified and assessed. The extent and quality of wetlands will be summarized. A Wetland Delineation Report, which will include, to the extent available, maps and shapefiles for NYSDEC and U.S. Army Corps of Engineers (USACE) review, will be included as an Appendix to the DGEIS. The Project's location with respect to any floodplains as well as a description of the existing drainage patterns on the Project site and associated receiving waterbodies will be provided. The DGEIS will identify applicable water resource permits or certifications that must be applied for and obtained prior to work commencing.

3.4 Biological Resources

The DGEIS will describe the dominant ecological communities, plant species, wildlife species (including aquatic and avian species), and available habitat within the Project site. The description of existing conditions will be based on site investigations and publicly available sources. The DGEIS will document and map the vegetation communities within the Project site, as identified through review/interpretation of aerial imagery and field verification.

Field studies will identify existing plant species that are invasive, non-native, or both invasive and non-native. In addition, any known occurrences of threatened or endangered

species will be identified and associated information resulting from consultations with the New York Natural Heritage Program (NHP) and the U.S. Fish & Wildlife Service (USFWS) will be provided. Summaries of field studies will be included as an appendix to the DGEIS.

3.5 Historic and Cultural Resources

The DGEIS will address cultural resources within and adjacent to the Project site, such as above-ground historic resources and archaeological sites. The assessment will include an inventory of known cultural resources, including sites, structures, and districts of significant historic and/or archaeological value. This inventory will be compiled through review of existing documentation, such as the State and National Registers of Historic Places, NYS Office of Parks, Recreation, and Historic Preservation (OPRHP) Cultural Resource Information System (CRIS) database, local historic preservation records, and previous cultural resources surveys conducted in the area. Relevant documentation will either be referenced or included as an appendix to the DGEIS.

3.6 Air Quality

The DGEIS will describe the regional climate and existing air quality status in the vicinity of the Project site based on publicly available data. Existing air quality in the Project site will be compared to State and National air quality standards. Existing sources of air emissions in the study area, due primarily to the adjacent approved Micron Semiconductor Manufacturing Facility and vehicular traffic, will be discussed.

3.7 Greenhouse Gas Emissions, Climate Change and Climate Resiliency

The DGEIS will describe the current landscape of greenhouse gas regulation by international, federal and state governments, including a discussion of the New York Climate Leadership and Community Protection Act (CLCPA). It will also describe current statewide greenhouse gas emissions in New York State and current climate conditions.

3.8 Solid Waste, Hazardous Waste, and Hazardous Materials

The DGEIS will include a review of historical land uses at the Project site to identify potential sources of contamination, such as chemical storage areas, former industrial sites or waste disposal locations. A Phase I Environmental Site Assessment (ESA) will be conducted and summarized, detailing any recognized environmental conditions. Based on the Phase I findings, the need for Phase II ESA investigations will be addressed and the findings discussed. The DGEIS will also describe existing solid and hazardous waste facilities in the study area(s), including current capacity limits and service areas. The Phase I ESA(s) will be appended to the DGEIS.

3.9 Human Health and Safety

The DGEIS will identify potentially sensitive receptors adjacent to the Project site that may be affected by construction and/or operations of the Park. It will also identify past environmental spills of petroleum or chemicals at or adjacent to the Project site that may have the potential to impact human health since contaminated soils could be disturbed during site construction. Relevant and available spill information will be appended to the DGEIS.

3.10 Utilities

Utilities that exist in the vicinity of the Project site will be described and mapped. Utilities will be discussed in terms of their appropriateness for commercial and industrial uses and corresponding capacities to support large-scale industrial and commercial uses at the Park. Information will be collected from service providers regarding water supply infrastructure, electrical capacity, natural gas service, telecommunications and fiber optic infrastructure, and available sanitary/wastewater treatment and sewer service in the Project site and surrounding area.

3.11 Transportation and Traffic

The transportation section will include discussion of existing traffic conditions along the NYS Route 31 corridor near the Project site and at intersections in adjoining areas of the Town of Clay from review and summary of previously prepared reports, studies and datasets within the surrounding area. This subsection will also briefly describe the existing pedestrian environment as well as other modes of transportation available in the area through review of previously prepared studies and data. NYS Route 31 is part of a designated bike route through the area. The CSX rail line will also be discussed. The DGEIS will describe proposed site driveways, internal circulation roadways, and parking facilities designed to accommodate peak employee demand and on-going construction activity. All relevant and relied upon previously prepared traffic reports, studies and datasets will be provided as appendices to the DGEIS.

3.12 Noise and Vibration

Ambient noise levels in the Project site will be described qualitatively based on existing land uses in the area and their potential for contributing to the existing noise environment. The noise discussion will be based on NYSDEC technical guidance documents and local law. Potentially sensitive noise receptors will be identified according to their existing locations, distances from the Project site and reasons why receptor locations are considered sensitive. This subsection will also include a discussion of applicable state and local laws regulating noise and vibrations for the Project site.

3.13 Visual Effects and Community Character

Community character will describe in text and graphic format the existing rural/suburban character of the Project site and its surroundings. The visual environment of the Project site

and surrounding study areas will be described in terms of sensitive receptors and existing visual characteristics. Existing visual resources known to be important to the community will be identified. Existing land uses that contribute to the character of the area will also be identified and discussed relative to their visual value. Photographs of strategic views to and from the Project site will be incorporated into the DGEIS to facilitate the description of existing visual quality and resources at the Project site and surrounding.

3.14 Community Facilities, Open Space and Recreation

The DGEIS will provide a description of community services, including police, fire, emergency medical services, solid waste facilities and schools that service the Project site. It will also describe and map existing parks and recreational resources within the surrounding area, including walking paths, trails, and local NYSDEC Wildlife Management Areas (WMA), using information made available by the State/County/Town parks agencies. The assessment will include a discussion of any planned changes to existing parks and recreational resources, and/or development of new parks and recreational resources planned to occur in the future.

3.15 Socioeconomic Conditions

Socioeconomic data on existing populations in the area surrounding the Project site will be provided as well as information on population trends and anticipated growth. Information will be summarized from various local and regional land use and socioeconomic studies and the most current U.S. Census, as well as provide a discussion of state law with respect to the use of eminent domain.

3.16 Environmental Justice

The DGEIS will provide a discussion of all applicable state laws, regulations and policies that require a review of the environmental justice impacts to areas designated as Potential Environmental Justice Areas (PEJA) and disadvantaged communities (DAC), as defined in ECL § 75-0101(5). This subsection will further identify any relevant census block groups within the area surrounding the Project site identified as PEJAs as well as areas identified as DACs.

4.0 POTENTIAL ENVIRONMENTAL IMPACTS AND MITIGATION

Section 4 will identify potential Project impacts on the environment. Information will be presented in similar order according to the same resource topics addressed in Section 3. Impacts will be discussed in terms of the likelihood of their occurrence, the geographic extent of their occurrence and anticipated significance. Impacts will also be discussed in terms of short-term and long-term implications with the focus on identifying and discussing potentially significant adverse environmental impacts that will require mitigation. Impacts that are considered minor and not significant will be briefly discussed.

The type and degree of Project related impacts will be determined through specific research and the analysis of data and other information provided in Section 3. The identification of impacts will also be based on discussions with involved and interested agencies and other knowledgeable Project stakeholders. Impacts will be identified by determining project consistency with applicable local, regional, state and federal regulations and what may be considered acceptable impact limits and thresholds. Section 4 will address reasonable mitigation measures to reduce or minimize potentially adverse impacts if avoidance is not practicable.

For purposes of defining the study area to be assessed for each potential Project impact, the total area of the Park, currently comprised of six (6) tax parcels owned by OCIDA, is 104.4-acres. This is equivalent to 0.163 square mile and will be the minimum study area size for impact analysis.

The text of Section 4 will be supplemented with maps, graphics, agency correspondence and agency data/analyses, reference to and/or summary of any previously prepared (and relevant) studies, and newly prepared support studies for the Project, as necessary, to convey the required information. Information will be discussed according to the Section 4 outline below:

4.1 Land Use, Zoning and Public Policy

The DGEIS will describe consistency of the Project with current local and regional land use plans, state and local laws, zoning and development patterns in the study area. As noted previously the Project is located in Residential/Agricultural (RA-100) and Highway Commercial (HC-1) zoning districts that do not permit the types of industrial and commercial uses being considered for the Park. As the Project is not presently consistent with local zoning, the DGEIS will discuss various options for compliance and proposed need for the potential use of eminent domain.

Measures to avoid or minimize significant adverse effects will be identified and described. Mitigation measures will be identified and described as needed for significant adverse impacts.

A 1-mile study area will be evaluated.

4.2 Geology, Soils, and Topography

The DGEIS will assess potential impacts to geology, soils and topography that could result from vegetation clearing, excavation and grading for construction, building foundations, site restoration, stormwater management and landscaping. Topographical concerns include changes in slope and cover type during or after Project implementation that could alter drainage patterns and potentially increase runoff. The DGEIS will evaluate soil characteristics that may cause or contribute to erosion. Subsurface and bedrock conditions will also be evaluated and how they relate to potential development of the Project site will be discussed based in part on past geotechnical investigations conducted in the Project site.

Measures to minimize or avoid significant adverse impacts by future tenant(s) will be discussed including the need for stormwater management and sedimentation and erosion control during and post-construction. Soil conservation, stockpiling, re-vegetation and

other best management practices to control soil erosion and sedimentation, maintaining water quality in streams and wetlands, and protection methods for vegetation and natural habitats will be addressed. In addition, mitigation measures for significant adverse impacts will be discussed.

The study area will be the Project site.

4.3 Water Resources

The DGEIS will assess potential impacts on surface and ground-water resources and evaluate how Project activities (including anticipated utility connections) might affect water quality, flow patterns, and wetland functionality. The DGEIS will identify the need for any Article 24 Freshwater Wetlands Permits, Article 15 Stream Disturbance Permits, or approvals required under Sections 401 and 404 of the Clean Water Act.

To address potential adverse impacts, the DGEIS will identify appropriate methods to avoid, minimize, and/or mitigate effects on surface water resources. This will include the development of conceptual stormwater management practices anticipated to meet NYSDEC State Pollution Discharge Elimination System (SPDES) requirements, including requirements for coverage under individual SPDES permits, as well as under the Construction General Permit (GP-0-25-001) and Multi-Sector General Permit (GP-0-23-001). These mitigation measures and strategies will be developed based on existing maps, reports, and studies, as well as wetland/stream delineations and conceptual stormwater management practice design prepared specifically for the DGEIS.

The DGEIS will describe efforts to avoid or minimize the extent of adverse impacts to wetlands by considering alternatives. Mitigation measures for the projected loss of any wetlands will be reached in consultation with the NYSDEC and USACE.

The Project site and relevant adjacent areas will be evaluated.

4.4 Biological Resources

The DGEIS will identify and evaluate potential ecological impacts associated with the Project. This analysis will include anticipated changes to existing vegetation communities and wildlife habitats and potential effects on any identified rare, threatened, or endangered species. The assessment will also consider potential increases in invasive species due to site disturbance.

The DGEIS will describe proposed measures to avoid and minimize impacts to ecological resources and rare, threatened, or endangered species as well as mitigation measures for any significant adverse impacts. This subsection will outline strategies to preserve or enhance existing habitats where possible, and measures to protect any identified sensitive species or habitats. It will also outline measures for invasive species management.

The Project site will be the study area.

4.5 Historic & Cultural Resources

The DGEIS will evaluate potential impacts of the Project on cultural archeological resources identified in Section 3.5. Impacts to cultural and archeological resources will be determined in consultation with the NYS OPRHP under the New York State Historic Preservation Act. Particular emphasis will be on potential effects on resources listed on or eligible for inclusion on the State and National Register of Historic Places. The results of a Phase IA archeological resource investigation of the Project site, including any utility infrastructure line and sewer line routes, will be provided in the DGEIS in compliance with NYS OPRHP requirements. If significant adverse impacts are identified, appropriate mitigation will be discussed. Mitigation may include resource avoidance, documentation and/or removal.

The DGEIS will also outline Native American consultation to be carried out pursuant to Section 14.09 of the New York State Historic Preservation Act of 1980, Section 106 of the National Historic Preservation Act of 1966 and 36 CFR 800, as well as guidance under DEC Policy CP-42/Contact, Cooperation and Consultation with Indian Nations, where required and appropriate.

The study area will be the area within ¼ mile of the Project site.

4.6 Air Quality

Impacts on air quality will depend on the types of industrial and commercial uses and emissions generated by tenants at the Park. The DGEIS will provide a general assessment of the air emissions, including odor and fugitive dust, that could be generated from potential Park tenants. This assessment will include potential impacts from potential mobile, including construction vehicles and increased vehicular traffic, in accordance with applicable NYS DOT guidance, and stationary sources. Avoidance and minimization measures will be assessed as will mitigation measures for any significant adverse environmental impacts. It is assumed that future tenants will need to go through specific state and federal air quality permit processes as necessary.

A 1/2 mile study area will be evaluated.

4.7 Greenhouse Gas Emissions, Climate Change and Climate Resiliency

Impacts on climate change and climate resiliency will depend on the types of industrial and commercial uses and emissions generated by tenants at the Park. The DGEIS will provide an assessment of potential greenhouse gas emissions from development of the Park. It is assumed that future tenants will be required to complete a CLCPA analysis for approval by the NYSDEC. The DGEIS will include discussion of proposed proactive avoidance and minimization measures for tenants, such as process improvements, energy efficiency goals and air emission controls. In addition, mitigation measures for significant adverse impacts

will be discussed. Further, the DGEIS will assess future climate change hazards, including drought, flooding and storm-surge risks, that may increase.

A 1/2 mile study area will be evaluated.

4.8 Solid Waste, Hazardous Waste, and Hazardous Materials

The DGEIS will evaluate potential impacts associated with the disturbance of contaminated soil or groundwater during construction, the introduction of new hazardous materials as part of the Project's potential operations, and the potential for accidental releases or spills. Possible mitigation measures will be proposed such as methods to reduce the generation of hazardous waste. The DGEIS will also recognize applicable federal and/or state regulatory compliance requirements (e.g., 6 NYCRR Parts 370-373). It is assumed that future tenants will need to comply with all relevant local, state and federal laws and regulations, including for obtaining permits for bulk storage, maintenances of plans and records, and proper handling, storage and disposal of hazardous materials and waste.

The DGEIS will also discuss impacts associated with increased demand of existing solid and hazardous waste facilities as a result of development and operations at the Project site. This will include a discussion of hazardous waste listed in 6 NYCRR Part 371.4 that may be generated by the construction and operation of the Park, including volumes, storage, and disposal (if known). This analysis will be based on publicly available data and correspondence/interviews with officials from existing service providers, as well as previously conducted studies of the Project area. Potential avoidance and minimization measures will be identified and described, as needed. In addition, mitigation measures for significant adverse impacts will be discussed.

In addition to addressing issues of direct solid waste generation from the Project, the DGEIS will also assess potential indirect impacts on the management of solid waste and recyclables associated with the Project.

Regional capacity for solid waste will be evaluated, including the potential need for new or expanded waste management facilities. Hazardous materials and hazardous waste will be evaluated on a site-specific basis.

4.9 Human Health and Safety

The DGEIS will discuss potential direct or indirect human health effects of the Project considering certain nearby sensitive receptors, the potential to disturb contaminated soils, and potential waste generation of the Project. Human health impacts of potential waste generation of the Project and off-site improvements will be discussed in Section 4.8.

Potential avoidance and minimization measures will be identified and described, as needed. In addition, mitigation measures for significant adverse impacts will be discussed.

Project site specific impacts will be evaluated.

4.10 Utilities

Potential impacts to be evaluated include those from the projected energy usage, wastewater and water demands at full buildout of the Park. This review of impacts to utilities will include effects on local power generation and transmission systems, effects on wastewater, and potable water infrastructure, and impacts from any necessary expansions to those utility systems. Impacts on telecommunications, including necessary improvements, will also be evaluated. The DGEIS will provide verification from personal communications or other documentation from service providers, including Onondaga County Water Authority (“OCWA”), OCDWEP and National Grid, as to the ability of existing utilities to support site development. Utility service thresholds or limits on capacities will be identified based upon information from providers and previously prepared studies within the Project area.

Potential avoidance and minimization measures will be identified and described, as needed. In addition, mitigation measures, such as water conservation and reuse, for significant adverse impacts will be discussed, as well as the potential to use of alternative sources to the extent they are available, such as collection of rainwater

Capacities for electricity, water, and wastewater will be evaluated. To the extent utility improvements are needed, limits of disturbance of those improvements will be evaluated.

4.11 Transportation and Traffic

Potential impacts of the Project upon transportation systems and local road networks particularly from increased vehicular traffic along the Route 31 corridor and adjoining intersections will be discussed and analyzed. Impacts to the existing pedestrian environment as well as other modes of transportation, such as public transit, available in the area will also be discussed.

This subsection will include discussion of ways to avoid impacts to the public and potential minimization and mitigation efforts. Mitigation during construction could include delivery staging. Mitigation may also include new traffic signals, turning lanes, improved signage, and access road and intersection improvements adjacent to the Park. Required mitigation will be determined from the traffic analysis being conducted and in consultation with state and local highway departments, which will inform the analysis and proposed mitigation strategies.

The scope of the traffic impact analysis will be coordinated with the NYS DOT and will take into consideration previously planned and on-going traffic improvements within the Project study area.

4.12 Noise and Vibration

Noise and vibration generation from construction and operation of industrial and commercial uses will ultimately depend on future tenants. However, estimations of noise

and vibration levels, distances to sensitive receptors and sources of noise and vibrations based on the proposed development scenario will be addressed.

Noise impacts associated with development of the Project site will be considered for both construction and operation of industrial and commercial uses. Impacts will be described for both short-term and long-term periods. Short-term impacts will primarily result from construction activities, while long-term impacts will be associated with the operations at the Project site. The Project will also be discussed in terms of compliance with current Town of Clay noise and vibration regulations.

Noise- and vibration-related avoidance and minimization measures will be considered and described in the DGEIS. In addition, mitigation measures for significant adverse impacts will be discussed. The mitigation section of the DGEIS will evaluate adherence to town noise regulations and best management practices that could be implemented to minimize/mitigate noise and vibrations.

A 1/2 mile study area will be evaluated for construction and operation of the Project site. Noise impacts from traffic will be consistent with the scope of the traffic impacts analysis

4.13 Visual Effects and Community Character

The visual impacts of the Project and off-site improvements will be described in general terms relative to anticipated changes in visual character and views of the sites once development occurs. Photographic simulations will be prepared to depict the anticipated appearance of the completed Project and off-site improvements. The photographic simulation will also be used to evaluate the changes to the visual landscape considering factors such as scale, geographic extent, and line, form, texture, and color contrast with the existing features in the view.

To address potential adverse impacts to aesthetic resources, the DGEIS will recommend measures to avoid, minimize, or mitigate impacts to visual resources. Mitigation measures for significant adverse environmental impacts will be developed based on the results of the visual assessment. NYSDEC criteria for visual impacts will be used to inform the development of appropriate mitigation strategies, as needed. Avoidance, minimization and mitigation measures may include strategies such as architectural design modifications, landscaping, lighting alternatives or other visual screening techniques.

The DGEIS will also address impacts to community character, as development of the Project site will require rezoning of the site for industrial and commercial uses. Potential mitigation measures will be discussed.

A one-mile study area will be evaluated.

4.14 Community Facilities and Open Spaces and Recreation

The DGEIS will identify how the Project may impact community services, including local public schools, solid waste facilities, local police, fire and emergency service providers, and assess the capabilities of service providers to accommodate increased demand due to the Project. Information provided will include future capabilities based on publicly available data and correspondence/interviews with officials from existing service providers, as well from review of previously prepared studies and reports within the Project area.

The DGEIS will also identify how the Project may impact existing open space and recreational resources within or adjacent to the Project site and assess their abilities to accommodate any changes in demand or access due to the Project. Information provided will be based on publicly available data and correspondence with local parks and recreation departments.

Measures to avoid or minimize adverse effects will be identified and described. Mitigation measures will be identified and described, as needed.

A one-mile study area will be evaluated.

4.15 Socioeconomic Conditions

Changes to socioeconomic conditions and demographics resulting from full build-out of the Project site could have implications on jobs, wages, taxes, property values, housing, and schools. Further impacts to local taxes and municipal finances could result from costs from, for example, potential PILOT agreements or other tax strategies associated with attracting tenants to the Project site.

The DGEIS will provide an economic and fiscal impact analysis for the Project in Onondaga County. This analysis will take into consideration the types of industrial and commercial businesses anticipated to locate at the Park, which may include advanced electronics, test packaging, semiconductor manufacturing supply chain companies, warehouses and life sciences. The analysis will provide a long-term perspective on the Project's economic and financial implications. Economic analyses will be attached as an appendix to the DGEIS.

4.16 Environmental Justice

The DGEIS will not include an environmental justice analysis. Based upon a review of publicly available information, the Park is not located within ½-mile of a DAC nor located in or near a PEJA.

5.0 CUMULATIVE IMPACTS

The DGEIS will evaluate the potential cumulative impacts of the Project along with other known relevant/similar projects developed or proposed within the area of the Project site, including the

Micron Semiconductor Manufacturing Facility. 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.

6.0 IMPACTS ON THE USE AND CONSERVATION OF ENERGY

It is beyond the scope of the DGEIS to identify specific energy use and demand that may result from site construction and development because specific industrial tenants, energy requirements and uses are unknown. Some general energy demand estimates are possible based on the proposed development scenario and previous industrial interest expressed to OCIDA and will include energy demand during construction and operational phases. To the extent feasible, the DGEIS will contain a description of energy sources to be used during construction and operational phases, including alternatives that could reduce energy demands.

This section will discuss ways to implement energy conservation at the Project site that align with New York State's climate and energy goals by encouraging best management practices during its design, construction and operation. The analysis will be conducted in consideration of New York State climate and energy policies, such as the CLCPA, New Efficiency: New York, the New York State Energy Plan, Reforming the Energy Vision (REV), and the Department's Policy on Climate Change.

Proposed energy conservation measures will be identified, including recycling of materials used in industrial operations, the use of recycled materials to reduce solid waste streams and design of buildings and grounds. Leadership in Energy and Environmental Design (LEED) voluntary standards developed by the U.S. Green Building Council to promote high performance and sustainable buildings will be addressed. Renewable energy sources and implementing green infrastructure practices, for example with regard to stormwater management, will also be discussed.

7.0 GROWTH INDUCING IMPACTS

This section of the DGEIS will describe potential growth-inducing impacts the Project may have with respect to additional development in the vicinity of the Project site.

8.0 UNAVOIDABLE ADVERSE IMPACTS

This section of the DGEIS will identify impacts that are likely to occur despite mitigation measures and will compare these unavoidable impacts to Project-related benefits. This section will also identify general avoidance and mitigation measures, and Project-specific mitigation measures.

9.0 IRREVERSIBLE AND IRRETRIEVABLE COMMITMENT OF RESOURCES

This section of the DGEIS will identify those natural and man-made resources consumed, converted, or otherwise made unavailable for future use due to the Project.

10.0 REFERENCES

Sources of information cited in the DGEIS and reviewed as reference materials during the preparation of the DGEIS will be listed in the References section. Information will be provided by author, date and title. Website information will be noted. In addition significant conversations with agency personnel that are cited in the document will be listed by name, date and organizational affiliation.

Appendices to the DGEIS may include relevant SEQRA documentation, as well as technical reports or analyses discussing:

- the presence of streams and wetlands at the Park,
- geotechnical conditions,
- air quality existing conditions and potential impacts,
- existing noise conditions and potential impacts; existing traffic conditions and potential impacts;
- economic data and analyses;
- historic and cultural consultation documents;
- Phase I and II ESAs, potential environmental contamination liabilities, including reported spills;
- the presence of threatened and endangered species;
- existing visual conditions and potential impacts; and
- utility capacity.

APPENDIX A - RESPONSE TO COMMENTS

**Appendix A to Final Scope:
Response to Comments**

**White Pine Science and Technology Park
Town of Clay, Onondaga County, New York**

State Environmental Quality Review Act Lead Agency:
Onondaga County Industrial Development Agency (OCIDA)
335 Montgomery Street, Floor 2M
Syracuse, NY 13202
Phone: (315) 435-3770
Fax: (315) 435-3669
Email: WPSTP@ongov.net

Date: June 4, 2026

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INTRODUCTION

Onondaga County Industrial Development Agency (OCIDA) as Project Sponsor proposes to undertake master-planning for the development of its White Pine Science and Technology Park property located in the southeastern corner of New York State Route 31 and Caughdenoy Road in the Town of Clay, County of Onondaga, New York. The Park is envisioned to accommodate a mix of industrial and commercial uses that may include office, research, manufacturing, assembly, data processing, warehousing, high-tech materials/equipment and distribution facilities, as well as tier one supply chain companies that could support the Micron Semiconductor Manufacturing Facility (located in the adjacent White Pine Commerce Park), in a campus environment at the approximately 104± acres Park property (Project). The Park is currently zoned as Residential/Agricultural (RA-100) and Highway Commercial (HC-1).

The Park is highly suitable for industrial and commercial uses due to its proximity to ample electric power at the National Grid Clay substation west of Caughdenoy Road and CSX rail access. The Park can be readily connected to nearby utilities including water, sewer, electric, fiber optic, telephone, and natural gas.

Industrial and commercial facilities at the Park are proposed to be located in six development areas, encompassing ten (10) proposed buildings. The proposed development areas would range from 8 to 25 acres. These development areas are considered the most suitable from a development perspective due to favorable access, topography and other considerations including avoidance of wetlands and environmentally sensitive features. An application to the Town of Clay for rezoning to I-2 Industrial will be necessary to accommodate industrial and commercial uses at the Park.

The Project site will require additional infrastructure to support industrial and commercial development. Improvements along Caughdenoy Road and at the NYS Route 31/Caughdenoy Road intersection are necessary and will be determined in consultation with New York State Department of Transportation (DOT) and Onondaga County DOT. Separate from the Project, Onondaga County is undertaking an expansion of its Oak Orchard Wastewater Treatment Plant (OOWWTP) service territory and is currently constructing the new White Pine Pump Station at the southeast corner of Route 31 and Caughdenoy Road. Sanitary sewer collection infrastructure will be needed within the Park to connect to the White Pine Pump Station to provide service to future tenants.. Specific sewer infrastructure requirements for Park tenants will be determined in consultation with Onondaga County Department of Water Environment Protection (OCDWEP) and other stakeholder agencies. Additional electric and gas utility upgrades may also be required,

The “Project site” is defined as any location where project facilities and infrastructure will or might be constructed. This includes OCIDA’s 104± acre Park property and adjoining routes, rights-of-way and areas needed to support Project related infrastructure and improvements. “Off-site” is defined as any portion of the study area and areas of potential impacts not on or encompassed by the Project site.

Until a prospective tenant or tenants are known, it is assumed that the Park could be developed in several phases and by one or more industries. The full build-out scenario includes a conceptual site layout of buildings, parking, internal roadways, stormwater management areas and ancillary industrial and commercial facilities. The proposed development scenario at full build-out could accommodate a combined total of approximately 540,000 square feet (SF) of commercial/industrial space, additional supporting structures, with various building sizes and heights permissible under Town zoning to support specific development needs. For purposes of the Draft Scope and subsequent Draft GEIS, it is assumed that the largest proposed building will be no higher than the predominant building structures at the White Pine Commerce Park located on Route 31.

These uses and sizes are assumed for the full buildout scenario for purposes of evaluation in the DGEIS.

This document is an addendum to the Final SEQRA Scope. It identifies comments received through a public scoping process that ran from April 9, 2026 through May 15, 2026, including an in-person scoping meeting on April 30, 2026 at the Town of Clay Town Hall.

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

Summary of the SEQRA Process

On March 5, 2026, OCIDA initiated the SEQRA process pursuant to 6 NYCRR Part 617 (New York Environmental Conservation Law §§8-0101 et seq.) by declaring its intent to serve as Lead Agency for purposes of coordinated review of the Project and declaring the Project to be a Type I action. Also on March 5, 2026, OCIDA circulated a notice of intent to serve as Lead Agency to involved agencies, along with the completed Part 1 of the Environmental Assessment Form (EAF). No objections to that notice were received during the 30-day period commencing on that date.

Lead Agency

As Lead Agency, OCIDA is responsible under SEQRA for conducting a coordinated environmental review of the Project among all involved agencies and for preparing a Draft Generic Environmental Impact Statement (DGEIS). Subsequent to the DGEIS, a Final GEIS will be prepared, followed by a SEQRA Findings Statement(s) from OCIDA and Involved Agencies. The Final GEIS and OCIDA's Findings Statement will identify the conditions, criteria, or thresholds to guide future site-specific actions that may be undertaken.

Classification of Action

Based on the information contained in the complete EAF, the Project is considered a Type I Action under SEQRA, primarily because the development of the Park and construction of infrastructure will cover a relatively large geographic area and exceed the ten-acre threshold for Type I actions.

Determination of Significance

As lead agency, OCIDA completed Part 2 of the EAF. OCIDA found that one or more adverse environmental impacts of the Project may be significant. Therefore, on April 9, 2026, OCIDA prepared a positive declaration for the Project.

Public Comment Period and Public Hearing

The Draft Scope was made available for agency and public review and comment.

The comment period for scoping extended from April 9, 2026 to May 15, 2026. During this period, OCIDA held a public scoping meeting on April 30, 2026 from 6:00 p.m. to 8:00 p.m. at the Town of Clay Town Hall to obtain input from the public. The scoping meeting had simultaneous Spanish and American Sign Language interpretation and all members of the public that wished to speak were given the opportunity to do so.

OCIDA provided notice of availability of the Draft Scope and comment period and public scoping meeting in the Post Standard and on OCIDA's website. Notice was published in the Environmental Notice Bulletin.

Comments were accepted via:

- The public scoping meeting (in-person);
- Emailed comments to WPSTP@ongov.net; and
- Mail to OCIDA Attn: White Pine Science and Technology Park Project, Office of Economic Development, Onondaga County, 335 Montgomery Street, Floor 2M, Syracuse, NY 13202.

The list below identifies all commenters who submitted comments via email or mail during the comment period.

1. New York State Department of Environmental Conservation, Melanie Kukko, Environmental Analyst
2. Town of Clay, Brian P. Bender, Commissioner of Planning
3. Sonia Y. Kragh, MD
4. Christine Herrmann
5. Baxter Hankin

The following is a list of persons who commented at the public scoping meeting on April 30, 2026.

1. Shelly Hotaling
2. Janet Rathburn
3. Paul Doody
4. Ralph Turner
5. Cody Kelly, County Legislator, 14th District
6. Baxter Hankin

Response to Agency & Elected Official Comments

Commenter: New York State Department of Environmental Conservation (NYSDEC)

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.

Response: Because the DGEIS is not project specific, the scope does not propose to evaluate alternatives that could specifically reduce energy and fuel demands. With that being said, the DGEIS will evaluate potential impacts and establish thresholds and criteria for future projects that will include energy and fuel consumption specific criteria. The DGEIS will also assess the proposed use and conservation of energy (including provisions for renewable energy sources). The DGEIS will also include an evaluation of energy impacts from construction and long-term operation of a Park considering a range of potential uses or tenants, along with potential mitigation of those impacts.

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

Response: The avoidance of natural resources will be considered as part of the DGEIS alternatives analysis that considers project layouts.

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.

Response: The DGEIS will describe the applicable wetland delineation and permitting requirements.

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.

Response: The DGEIS will discuss applicable requirements. It will not, however, include a specific SWPPP as this environmental review is generic and not project specific. Notwithstanding, the DGEIS will note that prospective developers and tenants will be required, where applicable, to prepare a SWPPP pursuant to the New York State Stormwater Management Design Manual (SMDM) and must be included in any tenant-specific 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.

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.

Response: See Response to NYSDEC Water Resources Comment 2.

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.

Response: Comment noted. See also Response to NYSDEC Water Resources Comment 2.

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.

Response: The DGEIS will note the potential need to obtain a dam safety permit.

Wetlands and Streams

6. (3.7) [sic] 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.

Response: Comment noted.

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.

Response: Comment noted.

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.

Response: Comment noted.

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.

Response: Comment noted. The DGEIS will evaluate potential wetlands mitigation options for permanent unavoidable wetland losses.

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.

Response: Comment noted. The DGEIS will include discussion of wildlife habitats, potential impacts and mitigation.

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.

Response: Comment noted. The DGEIS will include an evaluation of marsh bird habitat. Should state listed or endangered birds be found, the DGEIS will include appropriate restrictions and mitigation measures, such as habitat creation, restoration and preservation.

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.

Response: Comment noted.

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.

Response: Comment noted. The DGEIS will evaluate potential impacts to archeological resources based on this correction. The EAF also will be corrected to reflect that archaeologically sensitive areas are present.

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 1/4 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.

Response: Comment noted.

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.

Response: Comment noted.

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.

Response: Comment noted.

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.

Response: Comment noted

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.

Response: Comment noted.

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.

Response: Comment noted.

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.

Response: The DGEIS will discuss the potential requirement of specific projects to comply with CLCPA Section 7, it will not include a CLCPA analysis. Rather, the DGEIS will evaluate GHG emissions in accordance with SEQRA.

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.

Response: See Response to NYSDEC GHG Comment 1.

3. (4.7) The 1/2 mile study area should not be relevant to GHG emissions and instead, emissions from the Proposed Project should be analyzed.

Response: Given the proposed development for the Park that will be evaluated as part of the DGEIS, a ½ mile study area is appropriate. The DGEIS will evaluate GHG emissions in accordance with SEQRA and establish appropriate thresholds and conditions for future projects.

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.

Response: The DGEIS will include an assessment of GHG emissions associated with the development of the Park and proposed mitigation measures as required by SEQRA.

5. (4.7) GHG mitigation should take place at the New York facility or in the immediate area, rather than in other cities or out of state. DEC offered illustrative examples regarding potential alternatives and mitigation measures the DGEIS could consider.

Response: Comment noted.

6. (4.7) Energy efficiency goals are not in and of themselves sufficient mitigation as they are aspirational.

Response: Comment noted.

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

Response: The DGEIS will discuss and evaluate climate change and climate resiliency using appropriate data and resources as required by SEQRA.

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”).

Response: The DGEIS will include cross-references as deemed appropriate and necessary.

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.

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

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.

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 indirect impacts on management of solid waste and recyclables 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.

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).

Response: Comment noted.

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.

Response: Comment noted.

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

Response: The DGEIS will include a discussion of available water sources and establish appropriate conditions and thresholds for future projects.

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

Response: The Scope was revised to reflect consideration of water conservation and reuse.

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

Response: See Response to NYSDEC Utilities Comment 2.

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.

Response: The Scope indicates that verification of communications with utility providers will be provided in the DGEIS, including provider capacities.

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.

Response: Comment noted.

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.

Response: The DGEIS will include a discussion of potential wastewater loading and flow and will establish appropriate conditions and thresholds for on-site wastewater pretreatment technologies.

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.

Response: Comment noted.

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).

Response: Comment noted.

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.

Response: The DGEIS is for development of the Park as a whole and not for specific projects. It will therefore consider potential downstream routes for the sewer to OOWWTP and establish appropriate conditions and thresholds for future projects.

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

Response: The DGEIS is for development of the Park as a whole and not for specific projects. It will therefore consider potential system design capacity and establish appropriate conditions and thresholds for future projects.

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

Response: The DGEIS is for development of the Park as a whole and not for specific projects. It will therefore consider potential conveyance design plans and specifications and establish appropriate conditions and thresholds for future projects.

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.

Response: The Scope has been revised to include a description of the local WMAs.

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.

Response: Discussion of cumulative impacts will consider the Micron facility. The Scope has been revised to specifically reference the Micron 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.

Response: The Scope has been revised to include a description of energy sources, including alternative sources.

Commenter: *Town of Clay (Brian Bender, Commissioner of Planning)*

Town of Clay Comment 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.

Response: Comment noted.

Town of Clay Comment 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.

Response: Comment noted. Because this is a DGEIS, it will establish specific design thresholds and conditions for future development at the Park.

Town of Clay Comment 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.

Response: Comment noted. Because this is a DGEIS, it will establish specific design thresholds and conditions for future development at the Park. See also Responses to NYSDEC Water Resources Comments 2, 3, and 4.

Town of Clay Comment 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.

Response: Comment noted.

Commenter: *Cody Kelly, County Legislator, 14th District (public scoping meeting)*

Comment 1: The commenter expressed concerns regarding the use of eminent domain and hopes that use of eminent domain can be avoided.

Response: Comment noted.

Comment 2: The commenter recognizes that OCIDA is working to maximize opportunities with additional supply chain investments. However, please keep in mind throughout the environmental review that there are many people living nearby between Country Meadows and Coachman's Crossing. The residents deserve to know that every step is being taken to ensure protection of air, water, soil, limiting light and noise pollution, mitigation of traffic. The commenter encourages OCIDA to leave no stone unturned to ensure questions are answered.

Response: Comment noted.

Response to Public Comments

Commenter: *Sonia Kragh*

Comment 1: 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).

Response: Review of an action so that the various stages or activities are addressed as though they were independent and unrelated actions (i.e. segmentation) (such as looking first only at a zone change as suggested), absent special circumstances, is contrary to the intent of SEQRA. The review will include potential impacts from a proposed zoning change. The Town of Clay, which is the agency responsible for rezoning, was provided notice of the action as an involved agency for this reason. In addition, the DGEIS will include an assessment of a range of alternatives, which will include a residential or mixed use component.

Comment 2: 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.

Response: The Draft Scope has been revised to evaluate residential and mixed-development uses of the Park.

Comment 3: 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.

Response: The DGEIS will evaluate the potential renewable energy as part of future projects proposed for the Project and will establish appropriate conditions and thresholds.

Comment 4: 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.

Response: There is no conflict of interest due to OCIDA's ownership of the parcels comprising the Park. Under SEQRA, the lead agency is normally the involved agency principally responsible for carrying out, funding or approving the action. As required by SEQRA, OCIDA circulated a notice to all potentially involved agencies of its intent to serve as Lead Agency. None of the potentially involved agencies objected to OCIDA serving as Lead Agency within the required timeframe of 30 days.

Comment 5: 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?

Response: OCIDA has elected to prepare a DGEIS to ensure that development of the Park is comprehensively evaluated. The DGEIS will therefore consider a range of reasonable alternatives and will establish thresholds and conditions that will dictate the need for, and scope for, environmental review required for specific development proposals. The need for a future project-specific EIS will be determined in accordance with SEQRA and these conditions and thresholds.

Comment 6: 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.

Response: Comment noted. The DGEIS will evaluate potential impacts on all environmental resource areas, identifying those that may be significant. The public will then have the opportunity to comment on this evaluation and identification of significant environmental impacts prior to issuance of the FGEIS.

Comment 7: 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.

Response: The DGEIS will describe the proposed site layout map as well as additional potential development layouts for the Park.

Comment 8: 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?

Response: The comment misstates the purpose and intent of a GEIS. The GEIS will evaluate potential development alternatives for the Park. It will then select a preferred alternative and establish thresholds and conditions for future projects that correlate with the impacts evaluated in the GEIS. Future projects for the Park will then be evaluated against the conditions and thresholds established by the GEIS and OCIDA’s Findings Statement. Neither OCIDA nor any future applicant can do anything it wants. In the event that OCIDA determines that a potential environmental impact for a future project at the Park has not been adequately addressed by the GEIS, either a site-specific or supplemental impact statement must be prepared.

Comment 9: 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.

Response: OCIDA respectfully disagrees with the assessment of the permitting and environmental review conducted for Micron. Notwithstanding, development of the Park is a separate action under SEQRA that will be evaluated in accordance with SEQRA. The

cumulative effects of the Proposed Project and Micron project will be considered in the DGEIS as appropriate and required under SEQRA.

Comment 10: 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.

Response: See Response to Comment 9. The proposed study areas are appropriate given the proposed development for the Park that will be evaluated as part of the DGEIS.

Comment 11: Departments of transportation NYS and Onondaga County [sic] 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.

Response: Micron's traffic impact study already contemplated development of the Park, including mitigation measures. The relevant transportation agencies will use this as part of their evaluation of future traffic improvements. The same is true for mobile source noise and air impacts that relied upon the same, expansive traffic impact study.

Notwithstanding, the DGEIS is a generic study of the Park. It is not for a specific project development, the timing of which is unclear at this juncture.

Comment 12: 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.

Response: The DGEIS will review potential impacts associated with anticipated infrastructure improvements needed to support the Park.

Comment 13: Page 5 - 1.0 Introduction and Project Description - the entire content other than the outline is missing from the pdf available to the public. This information needs to be provided and the public comment period extended to allow for review.

Response: See response to Public Comment 6.

Comment 14: 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.

Response: The Scope has been revised to include assessment of alternative uses, such as residential or mixed-use residential.

Comment 15: 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.

Response: The DGEIS will consider cumulative impacts, including where appropriate, the Micron Project. However, SEQRA does not require repeat study parameters. Instead, the DGEIS will establish conditions and thresholds for future projects and when additional review under SEQRA may or may not be required. SEQRA also establishes criteria for when a supplemental GEIS may be required.

The Micron Project EIS also details the anticipated phased construction schedule and associated impacts and that baseline of information will be used for purposes of the DGEIS.

Comment 16: 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.

Response: Comment noted. See also Response to Public Comment 15.

Comment 17: 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.

Response: See Response to Public Comment 15.

Comment 18: 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 development risks literally killing outdoor recreation and careers. Any GEIS should have repeat study parameters as the Micron project progresses.

Response: See Response to Public Comment 15.

Comment 19: 3.6 Air Quality - “existing sources of air emissions in the study area, due primarily to the adjacent approved Micron Semiconductor 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.

Response: The DGEIS will evaluate potential air impacts and establish conditions and thresholds for future projects. It is premature to rule out certain types of development. See also Response to Public Comment 15.

Comment 20: 3.7 Greenhouse 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.

Response: Relevant existing climate plans will be considered in the DGEIS. The Proposed Project does not include preparation of municipal climate plans.

Comment 21: 3.8 Solid Waste/Hazardous Waste and Materials - The current design build of the Oak Orchard Municipal and Industrial 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.

Response: The County treatment plans have been designed, evaluated under SEQRA and permitted to ensure that potential impacts, including that from emerging contaminants, are addressed. To the extent relevant, the DGEIS will consider emerging contaminants and establish appropriate thresholds and conditions for future projects.

Comment 22: 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.

Response: See Responses to Public Comments 9, 15.

Comment 23: 3.10-3.12 Utilities, transportation, traffic, noise, vibration - see prior comments. Any GEIS should have repeat study parameters as the Micron project progresses.

Response: See Responses to Public Comment 15.

Comment 24: 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.

Response: See Responses to Public Comments 9, 15

Comment 25: 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.

Response: See Response to Public Comments 1, 10.

Comment 26: (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).

Response: See Response to Public Comments 6, 10, 25.

Comment 27: 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.

Response: The cumulative impact review will consider other projects based on timing and location relative to the proposed development of the Park.

Comment 28: 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.

Response: The DGEIS will establish appropriate thresholds and conditions for future projects based on potential anticipated development of the Park. Future projects that exceed such thresholds or conditions will be required to undergo further environmental review under SEQRA as detailed in OCIDA's ultimate Findings Statement.

Comment 29: 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.

Response: See Response to Public Comments 1, 6, 28.

Commenter: *Baxter Hankin (via email & public scoping meeting)*

Comment 30 (email): 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.

Response: The DGEIS will assess a range of alternatives, including alternative project layouts and alternative scale. The DGEIS will also consider pedestrian and other mass transit options.

Comment 31 (email): 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.

Response: Comment noted.

Comment 32 (email): 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.

Response: Comment noted.

Comment 33 (email): 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.

Response: Comment noted.

Comment 34 (email): 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.

Response: Comment noted.

Comment 35 (email): 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.

Response: Comment noted.

Comment 36 (email): Excess infrastructure costs. The current design has too much pavement per building, since the driveways, pipes, and wires must be long to accommodate 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.

Response: Comment noted.

Comment 37 (email): 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.

Response: Comment noted.

Comment 38 (email): 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.

Response: Comment noted.

Comment 39 (email): The commenter provided a sketch of a proposed alternative site layout containing mixed use housing and retail, science & tech buildings, walking trails.

Response: Comment noted.

Comment 40 (public scoping meeting): With Micron across the street, the project as depicted in the Scope is not laid out in a way that would enable people to walk in between the buildings or from the buildings on the site across the street to Micron, reducing the usefulness of the bus stop and bus route that will be serving Micron, reducing that access for employment for those using the bus. The layout should be changed.

Response: Comment noted.

Comment 41 (public scoping meeting): Reorganizing the site so that persons who work there can walk between locations will spur a greater mixing of people who are working at different locations, increasing interaction, collaboration and innovation.

Response: Comment noted.

Comment 42 (public scoping meeting): Reorganizing the site for walkability and greater access to the bus will reduce the number of cars on the road, which will help with traffic.

Response: Comment noted.

Commenter: *Christine Herrmann*

Comment 43: Development of a Draft EIS is extraordinarily premature.

Response: See response to Public Comment 1.

Comment 44: 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 [sic] parcel. Cumulative pollution in Clay needs to be a factor in any EIS proposition going forward.

Response: The DGEIS will consider a range of alternative uses including residential or mixed use components. See also Response to Public Comment 15.

Commenter: Shelly Hotaling (public scoping meeting)

Comment 45: The commenter is concerned about water distribution at the site and the impact of the Micron construction fill. Will the site include retention ponds? The commenter noted that local residences do not have ditches. Also, not all residences are on public sewers, and have septic systems. The commenter is concerned that the development should include residential sewer hook ups.

Response: Comment noted.

Comment 46: Will there be safeguards for chemicals that will be used in the industrial buildings? Will the quality of life of nearby residents be affected?

Response: Comment noted.

Comment 47: The commenter raised concerns about the use of eminent domain. There is acreage that has not been purchased yet. Will the park be expanded?

Response: Expansion of the Park is not currently contemplated as part of this SEQRA review.

Comment 48: The commenter raised concerns about noise output from the Park because it will be right outside their doors.

Response: The DGEIS will consider potential noise impacts of the Park and mitigation of those impacts.

Comment 49: The commenter indicated that her neighbors are concerned that they are left in the dark. She request that OCIDA notify the neighbors if they plan on buying more property. These changes are life-changing for many who have been there 30+ years, so they would like to be informed.

Response: Comment noted. See Response to Public Comment 47.

Janet Rathburn (public scoping meeting)

Comment 49: The commenter expressed concern about the intense uses of an industrial park with no buffer between the existing residences. Could the Park place the intense uses toward Route 31, and place the less intense uses toward the back of the property that abuts the residences. The residences that are already there before OCIDA wanted to develop the Park, and should be protected.

Response: Comment noted. The DGEIS will consider alternative project layouts.

Paul Doody (public scoping meeting)

Comment 50: The commenter requested more community engagement when the DGEIS is made available, meaning presentation of the findings within the DGEIS. Micron did not provide information sessions to educate the public about what was in the document and to answer questions.

Response: Comment noted. OCIDA will involve the public as required by SEQRA.

Comment 51: The commenter acknowledged that the DGEIS presents unique challenges because the specific tenants are not known. Since assumptions are necessary in preparation of the DGEIS, the commenter requested that conservative assumptions be made so that a supplemental EIS would not be needed, further delaying the development. Be conservative and not optimistic, since Micron knows what type of entities would be interested or attracted to the Park.

Response: Comment noted.

Comment 52: The commenter indicated that, since this is so directly associated with Micron that Micron impacts will be considered as cumulative impacts.

Response: While the Park may be used for supply chain companies associated with Micron, it is not directly associated with the Micron Project. Notwithstanding, give the close proximity, the DGEIS will consider cumulative impacts of the Micron Project. See also Response to Public Comment 15.

Ralph Turner (public scoping meeting)

Comment 53: The commenter expressed concerns regarding displacement of persons and land, and asked that the EIS speak to accountability for environmental issues, such as chemicals that may be dangerous, that may affect land, air and thus, people.

Response: Comment noted.

Comment 54: The commenter would like the EIS to address accountability of the supportive contractors or businesses, as well as Micron, and to look for applications where they can be more instrumental in addressing concerns, especially where is [sic] concerns chemicals.

Response: The comment raises issues outside the scope of SEQRA. Notwithstanding, OCIDA recognizes the need for reputable contractors and businesses and all future projects will be required to comply with the FGEIS, any additional environmental review under SEQRA and all application local, state and federal laws and permitting requirements.